

DOC23/246088

Michael Cassel
Planning Secretary
Department of Planning and Environment
12 Darcy Street
Parramatta NSW 2150

Attn: Rob Sherry

06 February 2023

Dear Mr Cassel

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

I refer to Upgrades to Glenwood High School approved on the 25th August 2022.

In accordance, with condition C38 of the Development Consent, the following document has been submitted to the Planning Secretary for information:

- Independent Environmental Audit 1 State Significant Development (SSD23512960) Glenwood High School Upgraded dated 30th January 2023 (Rev 2)

As per the requirements of condition C38 & C39 the Department must be issued with a response from the proponent to the Independent Audit Report, therefore the following attachments are provided for your information:

- Attachment A - Response to Independent Audit non-compliances

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

Yours sincerely



Jeremy Stott
Project Director
Schools Infrastructure NSW

Attachment A – Response to Independent Audit non-compliances

Condition ID	Compliance Requirement	Audit finding	Audit Recommendation	Proponent's Proposed Action/Action Taken/Response	Evidence	Due Date/Status
A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (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).	Ensure all feedback from SSD-23512960-PA-3 RFI Attachment A is addressed in the project management plans.	Refer below under condition B18.	Refer below under condition B18.	Closed
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.	DE/SINSW to ensure the projects complaints register on the website is updated monthly and information is accurate.	The project team has established a workflow to verify that the Complaints register has been uploaded to the website each month. The project team will review and amend dates detailed in the Complaints register. The noise complaint from 10 October 2022 is now included in the Complaints register.	Refer to the latest Complaints register (as at 06/02/2023 i.e. January Complaints register) available on the SINSW project website demonstrating information is made publicly available as is it obtained, and the noise complaint has been captured. Correct dates for complaints have been provided to the Community Engagement Manager and will be made publicly available by 10/02/2023.	Open – incorrect dates in the complaints register to be amended by 10/02/2023.
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.	RCC 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'.	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).	DPE have been notified of the incident on 12 October 2022 and further supporting information provided to DPE on 18 October 2022. The project team will endeavour to provide future incident notification (if any) within 1 working day of becoming aware of the incident.	As per Post Approval Form_20221018000003.	Closed
B18	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to,	Section 1 Table 2 references that the	For clarity, include a statement and/or summary of the	For clarity, the project team have included a statement of the	CWMSP has been updated during Independent Audit proceedings and this NC	Closed

Condition ID	Compliance Requirement	Audit finding	Audit Recommendation	Proponent's Proposed Action/Action Taken/Response	Evidence	Due Date/Status
	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.	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.	contamination status findings from Douglas Partners in the CWMSP.	contamination status findings from Douglas Partners in the CWMSP.	confirmed closed by the Auditor.	
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.	Approval received.	N/A – approval received 19/11/2022.	As per Appointment of Experts_19112022_124459 letter dated 19/11/2022.	Closed



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



Denise Day (Principal Environmental Consultant/Lead Auditor) and Kristen Branks (Environmental Consultant/Support Auditor)

Prepared By:

Arcadis Australia Pacific Pty Ltd
Level 16, 580 George Street Sydney
NSW 2000 Australia
Tel: +61 2 8907 9000




Heather Tilley

Associate Technical Director
(Technical Review)

Prepared For:

School Infrastructure NSW



Heather Tilley

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

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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 (CWMSPP) 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 CWMSPP 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 27/09/2022.	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

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)

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

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.

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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 documentsEnvironmental 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">DocumentationInterviews: 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 interviewsEvaluation of compliance, audit findings and recommendations/ opportunities for improvementReporting
5	Key dates <ul style="list-style-type: none">15/12/2022: Opening Meeting15/12/2022: Site audit17/01/2023: Draft audit report31/01/2023: comments from client06/02/2023: 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

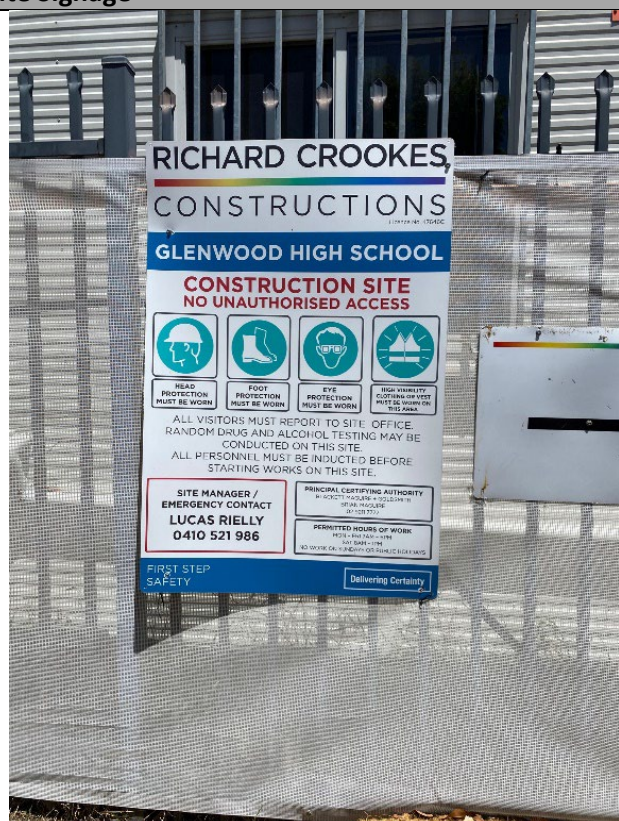


Photo 14: Site signage located on the eastern boundary

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



Photo 25: Road cleaning station at the site entrance on Glenwood Park Drive

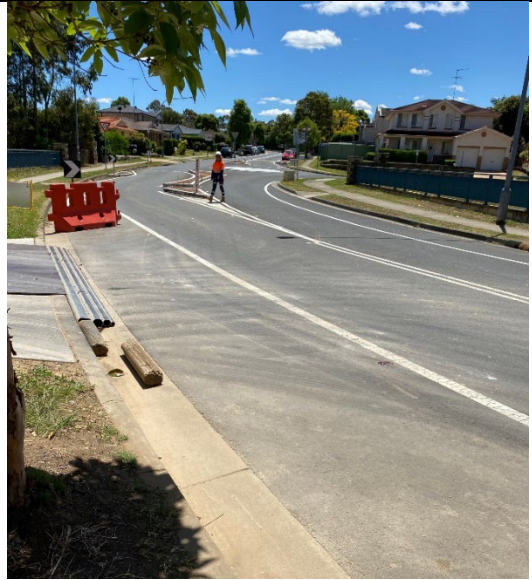


Photo 26: Site entrance from Glenwood Park Drive



Photo 27: Water tanker for dust management

Waste Management



Photo 28: General construction waste bin located adjacent to western boundary of the site (empty at the time of the audit).



Photo 29: Geneneral construction waste bin

Chemical storage



Photo 30: Chemical storage cage (bundled and locked)

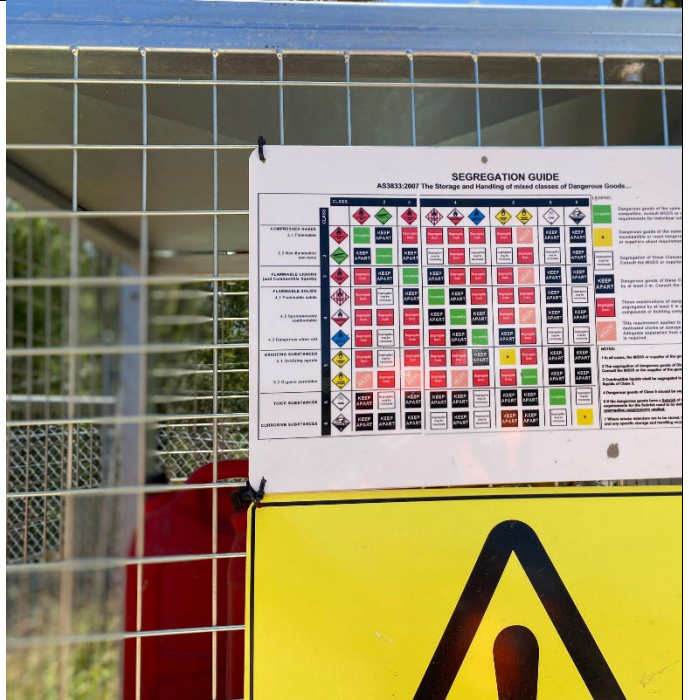


Photo 31: Chemical storage cage

Stockpiles



Photo 32: Topsoil stockpile located in the north-western corner of the site



Photo 33: Mulch stockpile located adjacent to the northern boundary of the site

Evidence of close out of site audit findings



Photo 34: Additional 'No Go Zone' signage on TPZs



Photo 35: Additional 'No Go Zone' signage on TPZs



Photo 36: Additional 'No Go Zone' signage on TPZs



Photo 37: Additional 'No Go Zone' signage on TPZs



Photo 38: Additional 'No Go Zone' signage on TPZs



Photo 39: Additional 'No Go Zone' signage on TPZs



Photo 40: Evidence of sediment fence repairs



Photo 41: Evidence of sediment fence repairs

APPENDIX E Audit Table

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and, if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development.	Audit findings Incident log Complaints register Site visit		Compliant				
A2	The development may only be carried out:			Non-compliant		NC1		
A2a	(a) in compliance with the conditions of this consent;	Audit findings Incident log	Non-compliance against condition: A2, A24b), A26, A2b), A24, A26, B18, C36	Non-compliant				
A2b	(b) in accordance with all written directions of the Planning Secretary;	DPE Correspondence: SSD-23512960-PA-3, Amended Plans, Condition B3, dated 20/10/2022. https://www.schoolinfrastructure.nsw.gov.au/projects/g/glenwood-high-school-upgrade.html#category-reports DPE Correspondence: SSD-23512960-PA-3, Amended Architectural and Landscape Plans, Condition B3 Request for Additional Information, dated 27/09/2022 DPE Correspondence: Glenwood High School Upgrade (SSD-23512960) Independent Audit - Auditor Approval dated 19/11/2022.	SSD-23512960-PA-3: <i>Ensure the drawings/plans publicly available on the project website at the earliest convenience.</i> Compliant - stamped plans have been made available on the project website (sighted 10/11/2022). SSD-23512960-PA-3: <i>requesting that you provide additional information by responding to the attached Department's Table of review comments (see Attachment A). Once completed, please return the Table of review comments as Word document, including the revised plans that show tracked changes and a separate clean final version to the Department.</i> Non-compliant - review of Attachment A responses and findings from this audit identified that feedback on the following conditions has not been addressed: B18c). This requirement was closed out following the issue of the draft audit report. Auditor Approval: <i>Please ensure this correspondence is appended to the Independent Audit Report.</i> Compliant - included in this audit report as Appendix A.	Non-compliant	Ensure all feedback from SSD-23512960-PA-3 RFI Attachment A is addressed in the project management plans (NC4 - closed).			
A2c	(c) generally in accordance with the EIS, Response to Submissions and Supplementary Response to Submissions; and	Environmental Impact Statement Glenwood High School (Architectus, 14/11/2021) (EIS) Submissions Report (SSD-23512960) Glenwood High School (Architectus, 18/02/2022) (RtS) 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)	At the time of the audit the development had been carried out in accordance with the EIS, Response to Submissions, Supplementary Response to Submissions and Amended Plans.	Compliant				
A2d	(d) in accordance with the approved plans (as may be amended by the conditions in Part B of this consent) in the table below:	Approved Plans	Amended plans were provided to the Planning Secretary. At the time of the audit the development had been carried out in accordance with the Amended Plans.	Compliant				
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:		Noted	Compliant				
A3a	(a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary;		Noted	Compliant				
A3b	(b) any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and		Noted	Compliant				
A3c	(c) the implementation of any actions or measures contained in any such document referred to in (a) above.		Noted	Compliant				
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		Noted. No inconsistencies or conflicts identified at the time of the audit.	Not triggered				
A5	This consent lapses five years after the date of consent unless work is physically commenced.	DPE correspondence: Major Projects email (dated 14/09/2022) confirming receipt of the notification of commencement of construction	Notification of commencement of construction for the Glenwood High School Upgrade was received by DPE on the 14 September 2022. Construction works under the consent started on the 05/10/2022.	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
A6	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022) Audit findings	Part 6, Division 8A is not in the version of the EP&A Regulation at the time of consent approval. Some provisions are provided under Part 4, Division 2, Subdivision 1. The project is compliant with the relevant clauses.	Compliant				
A7	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.		No disputes to date.	Not triggered				
A8	Where conditions of this consent require consultation with an identified party, the Applicant must:	Consultation documents	B6(a) B16(b) B19(a) B17(e) B31 C27(d) C28(b) D20(a) D30(c) E9 AN11 All consultation compliant (NBN consultation to be reviewed in the next audit).	Compliant				
A8a	(a) consult with the relevant party prior to submitting the subject document for information or approval; and	Consultation documents	All consultation compliant (NBN consultation to be reviewed in the next audit).	Compliant				
A8b	(b) provide details of the consultation undertaken including:	Consultation documents	All consultation compliant (NBN consultation to be reviewed in the next audit).	Compliant				
A8b(i)	the outcome of that consultation, matters resolved and unresolved; and	Consultation documents	All consultation compliant (NBN consultation to be reviewed in the next audit).	Compliant				
A8b(ii)	details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Consultation documents	No disputes to date.	Not triggered				
A9	The project may be constructed and operated in stages. Where compliance with conditions is required to be staged due to staged construction or operation, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the satisfaction of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A10	Staging Report prepared in accordance with condition A9 must:		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A10a	(a) if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish;		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A10b	(b) if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant);		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A10c	(c) specify how compliance with independent auditing requirements will be achieved across and between each of the operational stages of the project; and		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A10d	(d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A12	Where construction or operation is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report including independent auditing requirements.		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A13	The Applicant may:		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A13a	(a) prepare and submit any strategy, plan (including management plan, architectural or design plan) or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan (including management plan, architectural or design plan) or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan (including management plan, architectural or design plan) or program);		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
A13b	(b) combine any strategy, plan (including management plan, architectural or design plan), or program required by this consent (if a clear relationship is demonstrated between the strategies, plans (including management plan, architectural or design plan) or programs that are proposed to be combined); and		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A13c	(c) update any strategy, plan (including management plan, architectural or design plan), or program required by this consent (to ensure the strategies, plans (including management plan, architectural or design plan), or programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A14	Any strategy, plan or program prepared in accordance with condition A13, where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary.		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A15	If the Planning Secretary agrees, a strategy, plan (including management plan, architectural or design plan), or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.		There is no staging of compliance in relation to the Conditions of Consent.	Not triggered				
A16	Updated strategies, plans (including management plan, architectural or design plan), or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan, program or drawing.		remaining two CC will be reviewed in subsequent audits).	Not triggered				
A17	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. Note: Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022) (CC#1) Structural Design Compliance Certificate - CC1 – Structural Design Compliance Certificate – Buildings N and P (Rev 2) (SCP Consulting Pty Ltd, 23/09/2022)	First CC has been issued (note: the remaining two will be reviewed in subsequent audits). Structural Design Compliance Certificate - design compliance only; implementation to be reviewed in subsequent audits.	Compliant				
A18	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	GLENWOOD HIGH SCHOOL STATEMENT OF DESIGN CDVC1– Architectural Plans submitted for Crown Design Verification Certificate 1 (ground floor slab) (PTW, 14/09/2022) BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022)	Certification that the design is in accordance with normal architectural practice and meets the requirements of the BCA for Condition A18 – External Walls and Cladding. Refer to the following documents: □ GHS-AR-SW-SPC-9201 Architectural Specification □ GHS-AR-SW-SCH-9004 Schedule of Products and Materials □ Drawings - Floor Plans, Elevations, Façade Sections, External Wall Types and Façade Types. Included in CC#1.	Compliant				
A19	The external colours, materials and finishes of the buildings must be consistent with the approved plans referenced in Condition A2. Any minor changes to the colour and finish of approved external materials may be approved by the Certifier provided:	GLENWOOD HIGH SCHOOL STATEMENT OF DESIGN CDVC1– Architectural Plans submitted for Crown Design Verification Certificate 1 (ground floor slab) (PTW, 14/09/2022) BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022)	Certification of compliance with A19. Refer to the following documents: □ GHS-AR-SW-SPC-9201 Architectural Specification □ GHS-AR-SW-SCH-9004 Schedule of Products and Materials □ Drawings – Elevations. Included in CC#1.	Compliant				
A19a	(a) the alternative colour/material is of a similar tone/shade and finish to the approved external colours/building materials;	As above	As above	Compliant				
A19b	(b) the quality and durability of any alternative material is the same standard as the approved external building materials; and	As above	As above	Compliant				
A19c	(c) a copy of any approved changes to the external colours and/or building materials is provided to the Planning Secretary for information.	As above	No changes.	Compliant				
A20	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022) CC#1 attachments	The CC#1 attachments include references to the standards, policies and protocols applied.	Compliant				
A21	All works required by this consent must be designed and undertaken in accordance with the relevant aspects of the following Council documents, except as otherwise authorised by the consent:	Design Certificate CC1- Civil (SCP, 23/09/2022)		Compliant				
A21a	(a) Blacktown City Council's Works Specification – Civil;	Design Certificate CC1- Civil (SCP, 23/09/2022)	Compliance confirmed in Design Certificate.	Compliant				
A21b	(b) Blacktown City Council's Engineering Guide for Development;	Design Certificate CC1- Civil (SCP, 23/09/2022)	Compliance confirmed in Design Certificate.	Compliant				
A21c	(c) Blacktown City Council Development Control Plan including Part J – Water Sensitive Urban Design and Integrated Water Cycle Management;		Relates to conditions B31 and B32 which are not triggered. To be reviewed in the next audit.	Not triggered				
A21d	(d) Blacktown City Council On-Site Detention General Guidelines, the OSD Deemed to Comply Tool and standard drawing A(BS) 175M; and	Design Certificate CC1- Civil (SCP, 23/09/2022)	Compliance confirmed in Design Certificate.	Compliant				
A21e	(e) On Site Stormwater Detention Handbook – Upper Parramatta Rive Catchment Trust fourth edition.		Relates to conditions B31 and B32 which are not triggered. To be reviewed in the next audit.	Not triggered				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
A22	Consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.		Noted. No direction issued in relation to this condition.	Not triggered				
A23	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, Site audit report and independent auditing. <i>For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i>	This Audit	Noted.	Compliant				
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:	DPE correspondence: Major Projects email (dated 14/09/2022) confirming receipt of the notification of commencement of construction	Notification of commencement of construction for the Glenwood High School Upgrade was received by DPE on the 14 September 2022. Construction works under the consent started on the 05/10/2022. Non-compliant due to A24a)(viii) and A24b).	Non-compliant		NC2		
A24a	(a) make the following information and documents (as they are obtained or approved) publicly available on its website:	https://www.schoolinfrastructure.nsw.gov.au/projects/glenwood-high-school-upgrade.html#category-reports (accessed 10/11/2022)	Non-compliant due to A24a)(viii) and A24b)	Non-compliant				
A24a(i)	(i) the documents referred to in condition A2 of this consent;	https://www.schoolinfrastructure.nsw.gov.au/projects/glenwood-high-school-upgrade.html#category-reports (accessed 10/11/2022)	State Significant Development (SSD) application - external link to Major Projects EIS RfS SRfS	Compliant				
A24a(ii)	(ii) all current statutory approvals for the development;	https://www.schoolinfrastructure.nsw.gov.au/projects/glenwood-high-school-upgrade.html#category-reports (accessed 10/11/2022)	Development Consent - external link to Major Projects	Compliant				
A24a(iii)	(iii) all approved strategies, plans and programs required under the conditions of this consent;	https://www.schoolinfrastructure.nsw.gov.au/projects/glenwood-high-school-upgrade.html#category-reports (accessed 10/11/2022)	CEMP and subplans Stamped Plans	Compliant				
A24a(iv)	(iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;	https://www.schoolinfrastructure.nsw.gov.au/projects/glenwood-high-school-upgrade.html#category-reports (accessed 10/11/2022)		Not triggered				
A24a(v)	(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;	https://www.schoolinfrastructure.nsw.gov.au/projects/glenwood-high-school-upgrade.html#category-reports (accessed 10/11/2022)		Not triggered				
A24a(vi)	(vi) a summary of the current stage and progress of the development;	https://www.schoolinfrastructure.nsw.gov.au/projects/glenwood-high-school-upgrade.html#category-project-updates (accessed 10/11/2022) https://www.schoolinfrastructure.nsw.gov.au/projects/glenwood-high-school-upgrade.html#category-works-notifications	Project updates have been uploaded for September 2021, November 2021, June 2022 and September 2022. Works notifications were issued for the 6 March 2022 and 14 May 2022.	Compliant				
A24a(vii)	(vii) contact details to enquire about the development or to make a complaint;	https://www.schoolinfrastructure.nsw.gov.au/projects/glenwood-high-school-upgrade.html#category-reports (accessed 10/11/2022)	Contact options provided: Level 8, 259 George Street, Sydney NSW 2000 Mail: GPO Box 33, Sydney, NSW 2001 Email: schoolinfrastructure@det.nsw.edu.au Media enquiries: media.advisor@det.nsw.edu.au Does not specify that these options are available for making a complaint.	Compliant	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.			

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A24a(viii)	(viii) a complaints register, updated monthly;	https://www.schoolinfrastructure.nsw.gov.au/projects/g/glenwood-high-school-upgrade.html#category-reports (accessed 10/11/2022 and 06/12/2022) Glenwood High School Complaints Register (RCC, updated November 2022)	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 information in the 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 10/11/2022. Inaccuracies in the date of the complaint are discussed in Section 3.10.	Non-compliant	DE/SINSW to ensure the projects complaints register on the website is updated monthly and information is accurate. IO1: Ensure that the RCC Complaints Register is current and accurate.			
A24a(ix)	(ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;		This is the first construction audit.	Not triggered				
A24a(x)	(x) any other matter required by the Planning Secretary; and	DPE Correspondence: SSD-23512960-PA-3, Amended Plans, Condition B3, dated 20/10/2022. https://www.schoolinfrastructure.nsw.gov.au/projects/g/glenwood-high-school-upgrade.html#category-reports (accessed 10/11/2022)	SSD-23512960-PA-3: Ensure the drawings/plans publicly available on the project website at the earliest convenience. Stamped plans have been made available on the project website (sighted 10/11/2022).	Compliant				
A24b	(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.	https://www.schoolinfrastructure.nsw.gov.au/projects/g/glenwood-high-school-upgrade.html#category-reports (accessed 10/11/2022)	As specified for A24a(viii) the Complaints register has not been maintained monthly. If no complaints have been made this should also be specified.	Non-compliant	Same as above.			
A25	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Glenwood High School Project Site Induction (RCC) GHS Induction Register (221128).XLS	Slide 3 of the induction states that all conditions of the consent must be adhered to at all time and the copy of the approved drawings and conditions are available at the site office. Specific conditions are also addressed in the induction. The induction register provides confirmation that project staff have participated in the induction.	Compliant				
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.	Major Projects correspondence: confirmation of receipt of Incident Notification (12/10/2022) RCC correspondence (to Jacobs); GHS - Service Strike Incident, dated 06/10/2022 GHS - Incident Report Register.pdf	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'.	Non-compliant	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).	NC3		
A27	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.	Major Projects correspondence: confirmation of receipt of Incident Notification (12/10/2022) Documented oinfomation issued with the incident report on the 12/10/2022. GHS - Incident Report Register.pdf RCC correspondence (to Jacobs); GHS - Service Strike Incident, dated 06/10/2022 RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2022	One incident to date which occurred on the 06/10/2022. RDD correspondence indicates that Jacobs was notified of the incident on the 06/10/2022, six days before the Incident Notification (under condition A26) was lodged with DPE on the 12/10/2022 which included a suite of information comprising the incident report required under Appendix 2. Further detail was prepared by RCC (dated 17/10/2022), which was issued to DPE on the 18/10/2022..	Compliant				
A28	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.		No non-compliances identified by the Applicant.	Not triggered				
A29	The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.		No non-compliances identified by the Applicant.	Not triggered				
A30	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.		Noted	Compliant				
A31	Within three months of:			Not triggered				
A31a	(a) the submission of an incident report under condition A27;		Not within the 3 month period of the incident report being issued.	Not triggered				
A31b	(b) the submission of an Independent Audit under condition C35 or C36;		This is the first audit.	Not triggered				
A31c	(c) the approval of any modification of the conditions of this consent; or		No Modifications.	Not triggered				
A31d	(d) the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.		No direction issued from the PS.	Not triggered				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
A32	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) within six weeks of the review. <i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>			Not triggered				
PART B	PRIOR TO COMMENCEMENT OF CONSTRUCTON							
B1	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.	DE correspondence: DOC22/638926 Notification of Commencement in accordance with Condition B1 (dated 14/09/2022). DPE correspondence: Major Projects email (dated 14/09/2022) confirming receipt of the notification of commencement of construction	Notification of commencement of construction for the Glenwood High School Upgrade was issued by DE on the 14 September 2022. Construction works under the consent started on the 05/10/2022.	Compliant				
B2	If the construction or operation of the development is to be staged, the Planning Secretary must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Commencement of construction notification	No staging.	Not triggered				
B3	Prior to the commencement of construction, the relevant architectural and landscape plans referenced in condition A2 must be amended and submitted to the Planning Secretary. The amended plans must meet the following requirements:	DE correspondence: DOC22/856970 Amended Plans in accordance with Condition B3 Amended Plans in accordance with Condition B3 (dated 14/09/2022). DPE correspondence: SSD-23512960-PA-3 Amended Plans, Condition B3 (dated 20/10/2022)	The DPE correspondence acknowledges the receipt of the amended plans and notes that no issues were raised by the Department.	Compliant				
B3a	(a) 25 additional on-site car parking spaces consistent with the 'Traffic Statement for Additional Parking Provision' prepared by TTW dated 17 June 2022 (submitted with the SRtS);		DA-AR-0010_PDF_E DA-AR-0020_PDF_E DA-AR-0021_PDF_E DA-AR-0022_PDF_E DA-AR-0023_PDF_E DA-AR-0024_PDF_E DA-AR-0401_PDF_E DA-AR0408_PDF_E DAAR 2005_PDF_E DA-AR-2006_PDF_E DA-AR-2007_PDF_E DA-AR-2008_PDF_E DA-AR-A101_PDF_E DA-AR-A102_PDF_E DA-AR-N103_PDF_E DA-AR-N113_PDF_E DA-AR-N123_PDF_E DR-AR-N133_PDF_E indicate 10 additional car spaces on the eastern side and 15 on the western side of the development.	Compliant				
B3b	(b) include the planting of 21 additional trees using locally native tree species (Cumberland Plain Woodland species);	Site visit	GHS-LS-SW-DRW-0301_04 DA-LA-0001 DA-LA-0003 DA-LA-0010 indicate the locations for the new tree plantings.	Compliant				
B3c	(c) batters must not exceed a grade of 1V:5H and must be stabilised with topsoil, turf and vegetation; and		GHS-LS-SW-DRW-0301_04 GHS-LS-SW-DRW-0311_02	Compliant				
B3d	(d) finished levels of all internal works at the road boundary of the property must be 4% above the top of the adjacent kerb.		GHS-LS-SW-DRW-0301_04 GHS-LS-SW-DRW-0311_02 This is named incorrectly as B3(c) in DOC22/856970	Compliant				
B4	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.	BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022) (CC#1) Structural Design Compliance Certificate - CC1 – Structural Design Compliance Certificate – Buildings N and P (Rev 2) (SCP Consulting Pty Ltd, 23/09/2022)	Structural Design Compliance Certificate was included in CC#1.	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
B5	Prior to the commencement of construction, the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the BCA. The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days	GLENWOOD HIGH SCHOOL STATEMENT OF DESIGN CDVC1– Architectural Plans submitted for Crown Design Verification Certificate 1 (ground floor slab) (PTW, 14/09/2022) BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022)	Certification that the design is in accordance with normal architectural practice and meets the requirements of the BCA for Condition A18 – External Walls and Cladding. Refer to the following documents: □ GHS-AR-SW-SPC-9201 Architectural Specification □ GHS-AR-SW-SCH-9004 Schedule of Products and Materials □ Drawings - Floor Plans, Elevations, Façade Sections, External Wall Types and Façade Types. Included in CC#1.	Compliant				
B6 B6a	Prior to the commencement of construction, the Applicant must: (a) consult with the relevant owner and provider of services and Infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;	RCC email to: BCC 09/09/2022 Endeavour Energy 28/08/2022 Jemena 28/08/2022 Sydney Water 28/08/2022 Telstra 28/08/2022	Copies of Dilapidation Reports were issued with the emails and feedback requested. Jemena response: no objection for your proposed works at 85 Forman Avenue Glenwood. Telstra response: contact details should NBN works be required. NBN consultation not conducted at the time of the audit. To be assessed in Audit 2. BCC: request was passed on.	Compliant Compliant				
B6b	(b) prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non-residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected;	Pre-Construction Condition Survey (AusDilaps, undated) Dilapidation Report / Pre-Construction Survey (Council Assets) BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022)	AusDilaps was commissioned by Richard Crookes Constructions Pty Ltd to carry out a pre-construction condition inspection and report in accordance with AS.4349.0 for the Glenwood High School - Glenwood Park Drive & Forman Avenue, Glenwood NSW project. Inspections were conducted on the 17/18 May 2022. Council Assets were inspected on the 24/05/2022.	Compliant				
B6c	(c) submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and	Pre-Construction Condition Survey (AusDilaps, undated) Dilapidation Report / Pre-Construction Survey (Council Assets) BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022)	Dilapidation reports are included in CC#1.	Compliant				
B6d	(d) provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested. <i>Note: A footpath/road condition assessment fee must be paid to Council in accordance with Council's Goods and Services Pricing Schedule.</i>		No request from PS.	Not triggered				
B7	Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of residential buildings in proximity to the site that are likely to be impacted by the development (if any).		Not Triggered - No residential dilapidation survey undertaken; no residential properties within the proximity of the site boundary	Not triggered				
B8	Where the offer for a pre-construction survey is accepted (if applicable as required by condition B7), the Applicant must arrange for a survey to be undertaken by a suitably qualified and experienced expert prior to the commencement of vibration generating works that could impact on the identified buildings.		Not Triggered - No residential dilapidation survey undertaken; no residential properties within the proximity of the site boundary	Not triggered				
B9	Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by condition B8, the Applicant must:		Not Triggered - No residential dilapidation survey undertaken; no residential properties within the proximity of the site boundary	Not triggered				
B9a	(a) provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report;	Pre-construction survey	Not Triggered - No residential dilapidation survey undertaken; no residential properties within the proximity of the site boundary	Not triggered				
B9b	(b) submit a copy of the Pre-Construction Survey Report to the Certifier; and	Pre-construction survey notification to certifier	Not Triggered - No residential dilapidation survey undertaken; no residential properties within the proximity of the site boundary	Not triggered				
B9c	(c) provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.	Pre-construction survey notification to Planning	Not Triggered - No residential dilapidation survey undertaken; no residential properties within the proximity of the site boundary	Not triggered				
B10	No later than 48 hours before the commencement of construction, a Community Communication Strategy must be submitted to the Planning Secretary for information. The Community Communication Strategy must provide mechanisms to facilitate communication between the Applicant, the relevant Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction.	Community Communication Strategy (CCS) Glenwood High School Upgrade (Version 1, September 2022) DE communication: DOC22/856961 Submission of Community Communication Strategy in accordance with Condition B10 (14/09/2022)	CCS: Document purpose (pg. 3) states that the CCS provides an overview of how SINSW will continue to communicate and consult with the community during design construction of the project and will be implemented throughout the construction phase of the project and for 12 months following construction completion. The CCS is included in the CEMP as Appendix 6.9 and is named Community Consultation and Complaints Handling.	Compliant	IO2: Change the name of Appendix 6.9 in the CEMP to Community Communication Strategy. IO3: Update the document control table in the CCS with the correct date.			

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
B10a	The Community Communication Strategy must: (a) identify people to be consulted during the design and construction phases;	CCS	CCS: Section 3 Table 2 identifies the stakeholders who will be informed and consulted during the design and construction phase via ongoing face to face meetings, communications collateral and digital engagement methods. No details provided for the stakeholders to be consulted during the design phase.	Compliant				
B10b	(b) include a requirement to give notice to adjacent properties and Council at least 5 days prior to works commencing for approved works under this consent which are located within Council controlled lands;	CCS	CCS: Section 4.2 states that construction works notifications will be distributed to targeted properties in the vicinity of the project, as shown in Figure 1. The specific details of this condition do not appear to be addressed, that is, notification to adjacent properties and Council at least 5 days prior to works commencing, which are located within Council controlled lands. No adjacent properties. No works located within Council controlled land.	Not triggered	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.			
B10c	(c) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development;	CCS	CCS: Section 4 details the procedures and mechanisms for the regular distribution of accessible information about or relevant to the development.	Compliant				
B10d	(d) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development;	CCS	CCS: The consent does not include the requirement for the formation of community-based forum.	Compliant	IO5: Specify that the formation of community-based forum is not required under the consent.			
B10e	(e) set out procedures and mechanisms:	CCS	CCS: Section 4 specifies the procedures and mechanisms.	Compliant				
B10e(i)	(i) through which the community can discuss or provide feedback to the Applicant;	CCS	CSS: Sections 4.1 and 6.4.	Compliant				
B10e(ii)	(ii) through which the Applicant will respond to enquiries or feedback from the community; and	CCS	CCS: Section 6.5.	Compliant				
B10e(iii)	(iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation.	CCS	CCS: Section 6.5.1.	Compliant				
B11	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either:	Email communication: LCI Consultants 14/07/2022	Green Star registration: Green Star Building - v1 (GS-6842B)	Compliant				
B11a	(a) registering for a minimum 5 star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifier; or	Green Star registration BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022)	Green Star registration: Green Star Building - v1 (GS-6842B). Included in CC#1.	Compliant				
B11b	(b) seeking approval from the Planning Secretary for an alternative certification process.			Not triggered				
B12	Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifier that all outdoor lighting to be installed within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.		No external construction lighting persists outside of the SSD construction hours. External Lighting works are to be include as a separate CDVC approval (CDVC 02)	Not triggered				
B13	Prior to the commencement of construction, demolition work plans required by AS 2601-2001 The demolition of structures (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier and Planning Secretary.	Demolition Plan Glenwood High School Project (Bare Demolition, Revision 1 September 2022) DE correspondence: DOC22/850223 Submission of demolition works plan and statement of compliance in accordance with Condition B13 (dated 14/09/2022)	The Demolition Plan was submitted on the 21/09/2022, while construction commenced on the 21/09/2022. SPQ - Bare Demolition (Demolition Licence: AD213691). Statement of compliance with the standard is provided on pg. 11.	Compliant				
B14	Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). <i>Note:</i> • The Environmental Management Plan Guideline is available on the Planning Portal at: https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval • The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020) CEMP and sub-plans	The CEMP and subplans listed below were reviewed against the Guideline and generally met the requirements.	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
B15	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following:	BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022) DE communication: DOC22/850208 Submission of Construction Environmental Management Plan (CEMP) in accordance with Conditions B15-B24 (to PS) dated 28/09/2022. Construction Environmental Management Plan (16/09/2022 and 12/12/2022)	Construction works under the consent started on the 05/10/2022. The CEMP is dated 16/09/2022. Errors are noted in the Revision Register which identifies Revision 1 18/07/2022 and Revision 2 06/07/2022, and does not include the current revision. CEMP is included in CC#1.	Compliant	IO6: Update the CEMP Revision Register with the correct information regarding the revisions.			
B15a(i)	(a) Details of: (i) hours of work;	CEMP	CEMP: Appendix 6.1 Section 3 states that Site Hours are 7:00 am to 6:00 pm Monday to Friday and 8:00 am to 1:00 pm Saturdays, no work Sundays or Public Holidays. Note: provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours: 6:00pm and 7:00pm, Mondays to Fridays inclusive; and between 1:00pm and 4:00pm, Saturdays. This is compliant with C4 and C5. CEMP Section 2.5 includes the hours of work under condition C4 only.	Compliant				
B15a(ii)	(ii) 24-hour contact details of site manager;	CEMP	CEMP: Section 2.5.	Compliant				
B15(iii)	(iii) management of dust and odour to protect the amenity of the neighbourhood;	CEMP	CEMP: Appendix 6.1 Section 15, all plant and equipment used on this project is to be properly maintained. Appendix 6.2: - Dust Generation Particulate Emissions (General) - Dust Generation (Demolition) - Dust Generation (Construction) - Odour	Compliant				
B15a(iv)	(iv) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	CEMP	CEMP: Appendix 6.2 - External lighting in compliance with AS 4282-2019	Compliant				
B15a(v)	(v) community consultation and complaints handling as set out in the Community Communication Strategy required by condition B10;		CEMP: Section 3 (6). The CCS is included as Appendix 6.9 of the CEMP.	Compliant				
B15b	(b) an unexpected finds protocol for contamination and associated communications procedure to ensure that potentially contaminated material is appropriately managed in accordance with the recommendations of the Report of Detailed Site (Contamination) Investigation (Ref: 94626.00), prepared by Douglas Partners and dated 12 November 2021;	Unexpected Finds Protocol (12/12/2022) (CEMP Appendix 6.4)	Section 3.3.1 references the findings from Douglas Partners and details the procedure and communications should unexpected contamination be encountered.	Compliant				
B15c	(c) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;	Unexpected Finds Protocol (12/12/2022) (CEMP Appendix 6.4)	Section 3.4	Compliant				
B15d	(d) Construction Traffic and Pedestrian Management Sub-Plan (see condition B16);	CTPMSP	CEMP: Appendix 6.5	Compliant				
B15e	(e) Construction Noise and Vibration Management Sub-Plan (see condition B17);	CNVMSPP	CEMP: Appendix 6.6	Compliant				
B15f	(f) Construction Waste Management Sub-Plan (see condition B18);	CWMSP	CEMP: Appendix 6.7	Compliant				
B15g	(g) Construction Soil and Water Management Sub-Plan (see condition B19);	CSWMSP	CEMP: Appendix 6.8	Compliant				
B15h	(h) Construction Flood Emergency Management Sub-Plan (see condition B20); and	CFEMSP	CEMP: Appendix 6.11	Compliant				
B15i	(i) Biodiversity Management Sub-Plan (see condition B21).	BMSP	CEMP: Appendix 6.10	Compliant				
B16	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:	Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) (TTW Revision 4, 21/09/2022 and Rev 5, 01/11/2022)		Compliant				
B16a	(a) be prepared by a suitably qualified and experienced person(s);	CTPMSP	The CTPMSP was prepared by Nathaniel Borja (of Taylor Thomson Whitting) - Traffic Engineer PWZTMP Card No. TCT1007469. Relevant CVs are attached at Appendix D.	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
B16b	(b) be prepared in consultation with Council and TfNSW;	CTPMSP	CTPMSP Appendix E provides an initial consultation emails dated 20/09/2022 from Michael Babbage to Council and TfNSW requesting comments and feedback on the CTPMSP (Rev 4) A response from TfNSW was received on the 20/10/2022 noting no objects and providing additional information regarding bus routes. These are included in Rev 5. A follow up email was issued on the 13/10/2022 and Rev 5 of the CTMSP issued on the 01/11/2022. No response was received from Council. Note also, Rev 4 is dated 21/09/2022 after the draft was issued for consultation. The compliance table in Section 2.2 references Section 2.3, however, consultation with Council or TfNSW is discussed in Section 2.5.	Compliant	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.			
B16c	(c) detail:			Compliant				
B16c(i)	(i) measures to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services;	CTPMSP	CTPMSP: Section 6 details the impacts of the project during construction on local traffic(6.1), cyclists (6.5), pedestrians (6.4) and public transport, including buses (6.3). Construction traffic management is detailed in section 5.	Compliant				
B16c(ii)	(ii) measures to ensure the safety of vehicles and pedestrians accessing adjoining properties where shared vehicle and pedestrian access occurs;	CTPMSP	CTPMSP: Section 5.3 Truck loading and unloading will occur wholly within the site compound. Traffic controllers will be implemented at the site entries as required to ensure safe and efficient movement of vehicles, pedestrians and the safety of workers within site. All deliveries are to be made within the approved work hours. Truck movements to and from the site will be scheduled outside of network peak hours to reduce impacts to the local road network, which includes busy town-centre areas and high pedestrian volumes. All construction vehicles enter and leave the site in a forward direction unless in specific exceptional circumstances under the supervision of accredited traffic controller/s.	Compliant				
B16c(iii)	(iii) heavy vehicle routes, access and parking arrangements;	CTPMSP	CTPMSP: Construction traffic vehicle routes are detailed in section 5.2. Routes provided are for Main Works Stage 1 and 2. Heavy vehicle parking is not required for the project. there will be no utilisation of public infrastructure for parking, or otherwise, of Heavy Vehicles. Section 4.2 describes the site access. Section 5.6 details construction workers parking arrangements.	Compliant				
B16c(iv)	the swept path of the longest construction vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, in accordance with the latest version of AS 2890.2; and	CTPMSP	CTPMSP: Section 5.2 states that the CTPMP has undertaken swept path analysis of the construction vehicle haulage routes, including swept path analysis of tight turning movements. Detailed measures would be refined in consultation with Council prior to any implementation. Swept path analysis for movements to the site are provided in Appendix C. Stage 1 - drawing T03; Stage 2 - States compliance with AS2890.	Compliant				
B16(v)	(v) arrangements to ensure that construction vehicles enter and leave the site in a forward direction unless in specific exceptional circumstances under the supervision of accredited traffic controller(s).	CTPMSP	CTMSP: Section 5.3.	Compliant				
B17	The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:	Construction Noise and Vibration Management Sub-Plan (CNVMSP) (PWNA, Rev2 08/09/2022 and Rev 3, 15/12/2022)		Compliant				
B17a	(a) be prepared by a suitably qualified and experienced noise expert;	CNVMS	The CNVMSP was prepared by Ben White of Pulse White Noise Acoustics Pty Ltd, a member of the Australian Acoustic Society. CV and membership of the AAS are included in Appendix B.	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
B17b	(b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);	CNVMS	CNVMS: Section 6.1 details the management procedures for noise. Note the compliance table in section 1.2 references section 4.1, however this is the criteria only.	Compliant	IO8: Update the compliance table in section 1.2 to reference section 6.1 not 4.1.			
B17c	(c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;	CNVMS	Sections 6.1 and 6.2.	Compliant				
B17d	(d) include strategies that have been developed with the community for managing high noise generating works;	CNVMS Letter requesting community inputs	CNVMS: Section 6.2 and 6.5.2 specifies that no community inputs were provided in response to the June 2022 update.	Compliant				
B17e	(e) describe the community consultation undertaken to develop the strategies in condition B17(d);	CNVMS GHS project update June 2022	CNVMS: Section 6.2 and 6.5.2 details the consultation through the June 2022 project update, which includes a request for community members to contribute to strategies.	Compliant				
B17f	(f) include a complaints management system that would be implemented for the duration of the construction; and	CNVMS	CNVMS: Section 6.5 and 6.6.	Compliant				
B17g	(g) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures in accordance with the requirements of condition B14.	CNVMS	CNVMS: Section 6.2.2 Noise Monitoring, Section 6.3.2 Vibration Monitoring, Section 6.4 Noise and Vibration Monitoring. There are not requirements for reporting, other than the inclusion of noise complaints in the monthly complaints updates under condition A24. This is included in the CNVMS.	Compliant				
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:	Construction Waste Management Sub-Plan (CWMSP) (EcCell, Version 3, 26/08/2022)	Non-compliant due to B18c)	Non-compliant		NC4		
B18a	(a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use for materials to remain;	CWMSP	CWMSP: Section 9 details the quantities and classification of waste during demolition, excavation and construction.	Compliant				
B18b	(b) information regarding the recycling and disposal locations; and	CWMSP	CWMSP: Section 7 and Appendix A	Compliant				
B18c	(c) confirmation of the contamination status of the development areas of the site based on the validation results.	CWMSP	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 27/09/2022. The recommendation was closed following the issue of the draft audit report.	Non-compliant	For clarity, include a statement and/or summary of the contamination status findings from Douglas Partners in the CWMSP (closed).			The CWMSP was updated following the issue of the Draft Audit report, as sighted by the auditor.
B19	The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMSP) and the plan must address, but not be limited to the following:	Construction Soil and Water Management Sub-Plan (CSWMSP) (SCP, Rev 2, 12/09/2022)		Compliant				
B19a	(a) be prepared by a suitably qualified expert, in consultation with Council;	CSWMSP	CSWMSP: prepared by James Clare Associate Civil Engineer Stormwater & Flood Modelling Specialist and Henry Lam Senior Civil Engineer. CVs provided in Appendix A. Section 1 states that consultation with Blacktown City Council (BCC) has occurred via email and telephone in the preparation of this report. Email correspondence from Council is included in Appendix B. No comments provided.	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
B19b	(b) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;	CSWMSP	CSWMSP: Section 2.1 states that site access shall be provided via two (2) stabilised construction vehicle access points which consists of a minimum 5m long by 3m wide 'shaker grid'. The following should be adhered to with regards to vehicle access:- • All construction vehicles entering/exiting the site shall be required to pass over the vehicle access to prevent them becoming a source of sediment. The vehicle entry may consist of a timber, concrete or steel shaker grid or rubble area; • The vehicle access area is to be maintained in a clean and serviceable condition throughout construction; • All public roads are to be cleaned immediately in the case that sediment is tracked onto the public roadway by vehicles leaving the construction site, and; • Unsealed roads within the site are to be topped with 100mm compacted thickness, 40mm nom aggregate. As required, vehicles are to be hosed down within the site prior to exiting to adjacent public roadways.	Compliant				
B19c	(c) describe all erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book';	CSWMSP	CSWMSP: Section 2.2, erosion and sediment control plans for each stage of construction, as shown in the drawings prepared by SCP, nominates the required measures. Includes sediment fences, and pit sediment traps, stockpile management, and site stabilisation. Erosion and Sediment Control Plan.	Compliant				
B19d	(d) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site);	CSWMSP	CSWMSP: Section 2.4 describes site management during minor and major events. The stormwater management system is described in the Erosion and Sediment Control Plan. For a minor storm event an inspection will be conducted prior to the re-commencement of works onsite. For a major event ensure that an overland flow path (southwest to northwest) is maintained and that the overland flow path does not generate or convey sediment unnecessarily.	Compliant				
B19e	(e) detail all off-site flows from the site; and	CSWMSP	CSWMSP: Section 2.4, cover minor and major events. Erosion and Sediment Control Plan.	Compliant				
B19f	(f) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 5-year ARI and 1 in 100-year ARI.	CSWMSP	CSWMSP: Section 2.4, cover minor and major events. Erosion and Sediment Control Plan.	Compliant				
B20	The Construction Flood Emergency Management Sub-Plan must address, but not be limited to, the following:	Flood Emergency Management Sub-Plan (FEMSP) (SCP, Rev 2, 30/08/2022)	Compliant	Compliant	IO9: Update the name of Appendix 6.11 of the CEMP to Flood Emergency Response Sub-Plan.			
B20a	(a) be prepared by a suitably qualified and experienced person(s);	FEMSP	FEMSP: prepared by James Claire of SCP). CV provided as Appendix A.	Compliant				
B20b	(b) address the provisions of the Floodplain Risk Management Guidelines (EHG);	FEMSP	FEMSP: Section 1 states that the Plan addresses the provisions of the Floodplain Risk Management Guidelines (EHG). This is discussed in Section 3.2.	Compliant				
B20c(i)	(c) include details of: (i) the flood emergency responses for both construction phases of the development;	FEMSP	FEMSP: Section 4 provides details of the flood response.	Compliant				
B20c(ii)	(ii) predicted flood levels;	FEMSP	FEMSP: Section 3.2 provides details of the flood categorisation (low risk) and predicted flood levels.	Compliant				
B20c(ii)	(iii) flood warning time and flood notification;	FEMSP	FEMSP: Sections 3.2 and 4.1 .	Compliant				
B20c(iv)	(iv) assembly points and evacuation routes;	FEMSP	FEMSP: Section 4.3.	Compliant				
B20c(v)	(v) evacuation and refuge protocols; and	FEMSP	FEMSP: Section 6.	Compliant				
B20c(vi)	(vi) awareness training for employees and contractors, and users/visitors.	FEMSP	FEMSP: Sections 4.2 and 5.	Compliant				
B21	Prior to the commencement of construction, the Biodiversity Management Sub-Plan must address, but not be limited to, the following:	Biodiversity Management Sub-Plan Update (BMSP) (Kleinfelder, Rev 3, 21/09/2022 and Rev 4, 25/10/2022)	Compliant. The BMSP was prepared as an update to the BMP prepared in response to the DPE Request for Additional Information dated 23/03/2022.	Compliant	IO10: Update the name of Appendix 6.10 of the CEMP to Biodiversity Management Sub-Plan.			

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
B21a	(a) be prepared by a suitably qualified and experienced person/s;	BMSP	The BMSP was prepared by James Baldry, David Martin and Gayle Joyce of Kleinfelder, who hold appropriate qualifications and are licensed or approved under the <i>Biodiversity Conservation Act 2016</i> (License Number: SL100730, Expiry: 31 March 2023).	Compliant				
B21b	(b) identify areas of land where impacts on biodiversity are to be avoided as outlined in the Biodiversity Development Assessment Report dated 14 July 2022 and the Biodiversity Management Plan dated 20 April 2022 prepared by Kleinfelder Australia Pty Ltd and how these areas will be protected from construction impacts;	BMSP Glenwood High School Biodiversity Development Assessment Report (BDAR) (Kleinfelder, Rev 3, 10/11/2021) Biodiversity Management Plan (BMP) Glenwood High School (Kleinfelder, Rev 2, 20 April 2022)	BMSP: Section 3.1 Table 1 identifies the Management Zones within the school site.	Compliant				
B21c	(c) set out the measures identified in the Biodiversity Development Assessment Report and Biodiversity Management Plan to minimise, mitigate and manage construction impacts on biodiversity, including timing and responsibility for delivery of the measures; and	BMSP BDAR BMP	BMSP: 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. Responsibilities are discussed in section 3.1.3.	Compliant				
B21d	(d) be consistent with the recommendations relating to the construction phase set out in the Biodiversity Development Assessment Report and Biodiversity Management Plan.	BMP BDAR BMP	BMSP: Section 3.3 is consistent with the measures identified in Section 5.3 of the BDAR and BMP.	Compliant				
B22	A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following:	CTPMSP Site visit	CTPMSP: Section 5.5 Drover Code of Conduct. There are no details regarding how the Code will be communicated. In terms of ensuring compliance Section 5.5 states that it is recommended to develop a program or a checklist to ensure truck drivers are adhering with driver code of conduct. MPs issued to contractors including haulage. Driver Code of Conduct issued on exiting the site. Copies were sighted during the site visit.	Compliant	IO11: Include details in the CTPMSP on how the Driver Code of Conduct will be communicated.			
B22a	(a) minimise the impacts of earthworks and construction on the local and regional road network;	CTPMSP	CTMSP: Section 5.5	Compliant				
B22b	(b) minimise conflicts with other road users;	CTPMSP	CTMSP: Section 5.5	Compliant				
B22c	(c) minimise road traffic noise; and	CTPMSP	CTMSP: Section 5.5	Compliant				
B22d	(d) ensure truck drivers use specified routes.	CTPMSP	CTMSP: Section 5.5 and section 5.2	Compliant				
B23	Prior to the commencement of construction, the Applicant must provide sufficient parking facilities on-site, including for heavy vehicles, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.	CTPMSP Site visit	CTMSP: Section 5.3 states that truck loading and unloading will occur within the site compound. The objective of the Construction Worker Transport Strategy (Section 5.5) is to minimise demand for parking in nearby public and residential streets or public parking facilities. Temporary on-site parking may be available within the construction site, however this will be subject to construction phasing and site compound arrangements, and workers are therefore advised to find alternative means of transport. No parking of construction vehicles on public and residential streets or public parking facilities was observed during the site visit.	Compliant				
B24	Prior to the commencement of construction, the Applicant must submit a Construction Worker Transportation Strategy to the Certifier. The Strategy must detail the provision of sufficient parking facilities on-site and/or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be provided to the Planning Secretary for information.	BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022) CTPMSP DE communication: DOC22/850208 Submission of Construction Environmental Management Plan (CEMP) in accordance with Conditions B15-B24 (to PS) dated 28/09/2022.	CTPMSP: Section 5.5 Construction Worker Transportation Strategy includes preferred travel modes, bus options and the requirements for on-street parking. The Strategy was submitted to the Planning Secretary with the CEMP. Submitted as part of CC#1.	Compliant				
B25	Prior to the commencement of construction, the Applicant must prepare and implement for the duration of construction:	FEMSP	Compliant	Compliant				
B25a	(a) flood warning and notification procedures for construction workers on site; and	FEMSP	FEMSP: Sections 3.2 and 4.1 .	Compliant				
B25b	(b) evacuation protocols.	FEMSP Sit visit - notices Evacuation drill reports - MEET-80821 (RCC, 06/09/2022) MEET-96379 (RCC, 07/12/2022) GHS Site Induction (RCC) GHS Site Induction (RCC) Training records	FEMSP: Section 6. Emergency evacuation is covered in the site induction (Slide 18). All staff have participated. MEET-80821 identifies an emergency scenario was conducted on the 06/09/2022. 12 participants. Meet-96379 Plant Collision / Environmental Scenario conducted on the 07/12/2022. Site notices - Evacuation Plan (see Appendix D, Photo 15).	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
B26	Prior to installation of mechanical plant and equipment, the Applicant must submit evidence to the Certifier that the noise mitigation recommendations in the Glenwood High School Noise and Vibration Impact Assessment dated 12 November 2021 and prepared by AECOM Australia Pty Ltd have been incorporated into the design to ensure the development will not exceed the project noise trigger levels identified in the Glenwood High School Noise and Vibration Impact Assessment.	CNVMSP Glenwood High School Noise and Vibration Impact Assessment (AECOM Australia, 12 November 2021) Evidence of submission of noise mitigation recommendations to Certifier BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022)	CNVMSP: Section 1 states that the assessment for the CNVMSP has been undertaken based on the previously completed by Aecom including the Glenwood High School, Noise and Vibration Impact Assessment with reference DOC No. 60659173-RPNV-01_C and dated 12 November, 2021. Section 5 provides the predicted construction noise assessment and the predicted construction noise levels at surrounding receivers. Mitigations of construction noise required to be undertaken including measures detailed in Section 6. Not Triggered - Mechanical Plant works will be completed as part of a separate CDVC approval (CDVC 02)	Not triggered				
B27	Prior to the commencement of construction of waste storage and processing areas, the Applicant must obtain agreement from Council for the design of the operational waste storage area (where waste removal will be undertaken by Council). Where waste removal will be undertaken by a third party, evidence must be provided to the Certifier that the design of the operational waste storage area:		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B27a	(a) meets the waste storage area requirements as outlined in section 6 of the OWMP, prepared by EcCell dated 14 November 2021 (Version 1); and	OWMP (EcCell , Version 1, 14/11/ 2021) Council agreement evidence of approval of design and operational waste storage area Evidence to Certifier for design and operational waste storage area	Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B27b	(b) includes signage to clearly describe the types of materials that can be deposited into recycling bins and general garbage bins.	Signage - site visit Evidence to Certifier for design and operational waste storage area	Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B28	Prior to the commencement of Glenwood Park Drive footpath upgrade associated with the new pedestrian entry proposed in the EIS, the Applicant must submit plans and technical specifications for the proposed works to the satisfaction of Council. <i>Notes:</i> • <i>Approval must be obtained for roadworks under section 138 of the Roads Act 1993.</i> • <i>All costs associated with the proposed footpath upgrade works must be borne by the Applicant.</i> • <i>In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent.</i>	Evidence of submission and approval to Council for footpath upgrade and tech specifications	Not triggered.	Not triggered				
B29	Prior to the commencement of construction, the Applicant must submit plans and technical specifications for the proposed stormwater drainage connection into the existing kerbside inlet pit within Glenwood Park Drive to the satisfaction of Council. <i>Notes:</i> • <i>Approval must be obtained for roadworks under section 138 of the Roads Act 1993.</i> • <i>All costs associated with the proposed stormwater connection works must be borne by the Applicant.</i> • <i>In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent.</i>	Evidence of submission and approval to Council for stormwater drainage connection into existing kerbside inlet pit within Glenwood Park Drive	Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B30	Prior to the commencement of construction of operational parking and access facilities, evidence of compliance of the design of operational parking and access arrangements with the following requirements must be submitted to the Certifier:	Evidence of submission and approval to Certifier for construction of operational parking and access facilities	Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B30a	(a) a minimum of 118 on-site car parking spaces for use during operation of the development and designed in accordance with the latest versions of AS 2890.1 and AS 2890.6; and	Evidence of submission and approval to Certifier for construction of operational parking and access facilities	CTPMSP: Section 3.3.1 identifies that existing on-site car parking capacity provides 93 parking spaces, including one accessible parking space.30 of these spaces are available in the south-eastern car park and the remaining 63 on the western side of the site. As identified under condition B3(a) the amended plans have provision for an additional 25 parking spaces, bringing the total to 118. None of the documentation references compliance with the Standards. Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
B30b	(b) the swept path of the largest service vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the site, must be in accordance with the latest version of AS 2890.2.	Evidence of submission and approval to Certifier for construction of operational parking and access facilities	Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B31	Prior to commencement of construction unless otherwise agreed by the Planning Secretary, the Applicant must design an operational stormwater management system for the development in consultation with Council and submit it to the satisfaction of the Certifier. The system must comply with the following requirements:	Evidence of Council consultation for operational stormwater management system Evidence of submission and approval of operational stormwater management system	Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B31a	(a) be designed by a suitably qualified and experienced person(s);	Evidence of Council consultation for operational stormwater management system Evidence of submission and approval of operational stormwater management system	Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B31b	(b) be generally in accordance with the conceptual design in the EIS, RtS and SRtS drawings prepared by Enstruct Group Pty Ltd as listed in the table below (as amended by the conditions of this consent where applicable):	Evidence of Council consultation for operational stormwater management system Evidence of submission and approval of operational stormwater management system EIS, RtS and SRtS drawing (Enstruct Group Pty Ltd)	Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B31c	be in accordance with applicable Australian Standards;		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B31d	ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines;		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B31e	(e) the on-site detention (OSD) system must be designed in accordance with the relevant parameters set out in Council's Water Sensitive Urban Design Standard Drawings A(BS)175M On-site detention requirements – Sheet 20 or alternatively in accordance with the OSD Deemed to Comply Tool; and		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B31f	(f) the OSD system shall be generally designed to achieve the following:		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B31f(i)	(i) a minimum of 2 orifice plates must be used and designed to control the following flows:		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
	• the 1.5 Annual Recurrence Interval (ARI) orifice to convey a maximum of 40/L/s/ha		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
	• the 100 year ARI orifice to convey a maximum of 190L/s/ha		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B31f(ii)	(ii) storage must be provided as follows:		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
	• volume up to 1.5 year ARI Top of Wall Level (TWL) = 300 m^3/ha		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
	• volume up to 100 year ARI TWL = 455 m^3/ha		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B31f(iii)	(iii) orifice flow may be adjusted for bypass with a maximum site bypass of 15% as per the following table:		Not Triggered - Works are intended to be captured under a separate CDVC	Not triggered				
B32	The design of the stormwater management system required by condition B31 must be accompanied by the following documents:	B32_GHS-CV-SW-DRW-03-6003 ON-SITE DETENTION (OSD) DETAILS SHEET 1.pdf B32_GHS-CV-SW-DRW-03-6004 ON-SITE DETENTION (OSD) DETAILS SHEET 2.pdf	Not Triggered - Works are intended ie be captured under a separate CDVC. Current documentation provided for reference, note this is yet to be reviewed and endorsed by the Certifier.	Not triggered				
B32a	(a) certification from a Registered Engineer/s certifying that:		As above.	Not triggered				
B32a(i)	(i) the structures associated with the on-site stormwater detention system have been designed to withstand all loads likely to imposed on it during its lifetime;		As above.	Not triggered				
B32a(ii)	(ii) the on-site stormwater detention system will perform to meet the on-site stormwater detention requirements and function hydraulically generally in accordance with Council's Engineering Guide for Development, Development Control Plan Part J – Water Sensitive Urban Design and Integrated Water Cycle Management, Standard Drawing A(BS)175M and the OSD Deemed to Comply Tool;		As above.	Not triggered				
B32a(iii)	the internal drainage system is capable of carrying 1% AEP (100 year ARI) flows to the detention tank;		As above.	Not triggered				
B32b	Engineering drawings and Civil Engineering Design Report generally consistent with the requirements contained in Section 1 (ii) to (jj) contained in Blacktown City Council's letter (File No. MC-21-00005) dated 22 July 2022;	Engineering drawings and Civil Engineering Design Report	As above.	Not triggered				
B32c	(c) detailed drainage drawings with cross-sectional details of the storage area, pit numbers, pipe sizes and catchment plan;	Detailed Design drawings of stormwater management system	As above.	Not triggered				
B32d	(d) on-site detention detailed design submission and calculation summary; and		As above.	Not triggered				
B32e	(e) the OSD Deemed to Comply Tool summary details.		As above.	Not triggered				

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B33	Prior to commencement of construction, the Applicant must provide certification from a Registered Engineer/s certifying that the structural design for pier footings adjacent to the on-site detention and rainwater tank are a minimum of 300mm below the underside of the tanks. <i>Note: The depth of piers away from the tanks will be subject to the zone of influence.</i>	Structural Design Compliance Certificate - CC1 – Structural Design Compliance Certificate – Buildings N and P (Rev 2) (SCP Consulting Pty Ltd, 23/09/2022) BCA Crown Certificate (Blackett Maguire + Goldsmith (BMG), 04/10/2022)		Compliant				
B36	Prior to commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must provide certification from a Registered Engineer/s certifying that all toilet/urinal flushing and landscape watering is supplied with Non-Potable Water Supply. The plan/s is to show that the rainwater pipe and tank arrangement and generally include the following:	Certifier Approval for toilet/urinal flushing and landscape watering	Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36a	(a) a first flush or pre-treatment system;		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36b	(b) a pump with isolation valves;		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36c	(c) control panel and a warning light to indicate pump failure;		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36d	(d) an automatic solenoid controlled mains water bypass;		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36e	(e) flow metres on the solenoid controlled mains water bypass line and the pump outflow line, to determine actual non-potable usage % reuse;		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36f	(f) all the reuse pipes and taps are coloured purple;		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36g	(g) an automatic backwash inline filter;		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36h	(h) provision of a minimum one (1) external reuse tap near each building and one at the rear external wall of each building (minimum eight [8] in total) for general wash down and reuse;		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36i	(i) fitting rainwater warning signs to all external taps using rainwater;		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36j	(j) a minimum tank size of 56 KL below overflow; and		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
B36k	(k) compliance with Sydney Water requirements.		Not Triggered - Works are intended ie be captured under a separate CDVC	Not triggered				
Part C	During Construction							
C1	A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purpose of informing the public of project details and must satisfy the following requirements:	CEMP Site notices - site visit	The requirements for site notices are not included in the CEMP. Site notices observed during the site visit met the requirements (see Appendix D, Photo 14).	Compliant				
C1a	(a) minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size;	CEMP Site notices - site visit	The requirements for site notices are not included in the CEMP. Site notices observed during the site visit met the requirements (see Appendix D, Photo 14).	Compliant				
C1b	(b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period;	CEMP Site notices - site visit	The requirements for site notices are not included in the CEMP. Site notices observed during the site visit met the requirements (see Appendix D, Photo 14).	Compliant				
C1c	(c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice(s); and	CEMP Site notices - site visit	The requirements for site notices are not included in the CEMP. Site notices observed during the site visit met the requirements (see Appendix D, Photo 14).	Compliant				
C1d	(d) the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted.	CEMP Site notices - site visit	The requirements for site notices are not included in the CEMP. Site notices observed during the site visit met the requirements (see Appendix D, Photo 14).	Compliant				
C2	All construction plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner.	CEMP Site visit	CEMP: Appendix 6.1 Section 15, all plant and equipment used on this project is to be properly maintained. Appendix 6.2, A plant induction is conducted which includes visual inspections by RCC and review of SWMS/SOPs.	Compliant				
C3	Demolition work must comply with the demolition work plans required by Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001) and endorsed by a suitably qualified person as required by condition B13.		Not Triggered - No demolition works have taken place to-date on-site. Refurbishment works under the SSD yet to commence. Demountables relocated by others (SINSW AMU) under REF (not subject of the SSD).	Not triggered				
C4	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:			Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
C4a	(a) between 7am and 6pm, Mondays to Fridays inclusive; and	CEMP - check current version CNVMSP Complaints register Site Induction (RCC)	CEMP: Section 2.4 CNVMSP: Section 4.4.	Compliant				
C4b	(b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays	CEMP CNVMSP Complaints register	CEMP: Section 2.4 CNVMSP: Section 4.4.	Compliant				
C5a	Notwithstanding condition C4, provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours: (a) between 6pm and 7pm, Mondays to Fridays inclusive; and	CEMP CNVMSP Complaints register	CEMP: Section 2.4 CEMP and CNVMSP do not include this requirement.	Compliant				
C5b	(b) between 1pm and 4pm, Saturdays.	CEMP CNVMSP Complaints register	CEMP: Section 2.4. Appendix 6.1 Section 3	Compliant				
C6	Construction activities may be undertaken outside of the hours in condition C4 and C5 if required:	CEMP CNVMSP Complaints register	CEMP: Section 2.4	Compliant				
C6a	(a) by the Police or a public authority for the delivery of vehicles, plant or materials; or	CEMP CNVMSP Complaints register	CNVMSP: Section 4.4 states any works outside the proposed construction hours will be subject to specific prior approval from the appropriate authorities. Such work may include delivery of cranes, oversized equipment required to the site. CEMP: Section 2.4	Compliant				
C6b	(b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or	CEMP CNVMSP Complaints register	CEMP: Section 2.4	Compliant				
C6c	(c) where the works are inaudible at the nearest sensitive receivers; or	CEMP CNVMSP Complaints register	CEMP: Section 2.4	Compliant				
C6d	(d) for the delivery, set-up and removal of construction cranes, where notice of the crane-related works is provided to the Planning Secretary and affected residents at least seven days prior to the works; or	CEMP CNVMSP Complaints register	CEMP: Section 2.4 CNVMSP: Section 4.4 states any works outside the proposed construction hours will be subject to specific prior approval from the appropriate authorities. Such work may include delivery of cranes, oversized equipment required to the site.	Compliant				
C6e	(e) where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works.		This requirement has not been triggered.	Not triggered				
C7	Notification of such construction activities as referenced in condition C6 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	Notification to affected residents	Not Triggered - No out of hours works have been undertaken to date.	Not triggered				
C8	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:	CNVMSP Complaints register	CNVMSP: Section 6.3.1 Not Triggered - nil rock breaking required. Geotechnical Report has not identified extensive veins of rock strata	Not triggered				
C8a	(a) 9am to 12pm, Monday to Friday;	CNVMSP Complaints register	CNVMSP: Section 6.3.1 Not Triggered - nil rock breaking required. Geotechnical Report has not identified extensive veins of rock strata	Not triggered				
C8b	2pm to 5pm Monday to Friday; and	CNVMSP Complaints register	CNVMSP: Section 6.3.1 Not Triggered - nil rock breaking required. Geotechnical Report has not identified extensive veins of rock strata	Not triggered				
C8c	(c) 9am to 12pm, Saturday.	CNVMSP Complaints register	CNVMSP: Section 6.3.1 Not Triggered - nil rock breaking required. Geotechnical Report has not identified extensive veins of rock strata	Not triggered				
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	Audit findings Incident log Complaints register Site visit	The most recent versions of the CEMP and sub-plans have been communicated and are being used onsite.	Compliant				
C10	All construction vehicles are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site or an approved on-street work zone before stopping.	CTPMSP Complaints register Site visit	CTPMSP: Sections 5.3 and 5.4 states truck loading and unloading will occur wholly within the site compound. During the site visit no construction vehicles were observed to be contained within the work site. No complaints.	Compliant				
C11	The following hoarding requirements must be complied with:			Compliant				
C11a	(a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and	CEMP Site visit	Not included in the CEMP. No third-party advertising was observed during the site visit.	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
C11b	(b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application.	CEMP Site visit	Not included in the CEMP. No third-party graffiti was observed during the site visit. Interviews identified that the requirements of this condition were known.	Compliant				
C12	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances	CEMP Site visit	CTPMSP: Section 5.4 states all the loading/unloading activities will occur within the site. Therefore, the proposed construction works do not require an on-street works zone for such activities. No obstructions observed during the site visit.	Compliant				
C13	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.	CNVMSPP Complaints register Site visit	CNVMSPP: Section 4 outlines the construction noise objectives which are based on the Interim Construction Noise Guideline. The mitigation measure are detailed in Section 6.	Compliant				
C14	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C4.	CNVMSPP Complaints register Site visit Driver communications	CNVMSPP: Section 6.2.1 .	Compliant				
C15	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' to ensure noise impacts on surrounding noise sensitive receivers are minimised.	CNVMSPP Site visit	CNVMSPP: Section 6.2.1 states the contractor will also take reasonable steps to control noise from all plant and equipment. Examples of appropriate noise control include efficient silencers and low noise mufflers. Construction works are to be conducted in accordance with the Conditions of Consent, which includes item C15.	Compliant				
C16	Vibration caused by construction at any residence or structure outside the site must be limited to:	CNVMSPP Complaints register Site visit		Compliant				
C16a	(a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and	CNVMSPP Complaints register Site visit	CNVMSPP: Section 4.2.2 states the vibration effects on the building itself are assessed against international standards as follows: For continuous or repetitive vibration: German DIN 4150: Part 3 – 1999 "Effects of Vibration on Structure" (DIN 1999). The criteria are presented in Section 4.2.4. Vibration assessment of plant and equipment is presented in Section 5.4.	Compliant				
C16b	(b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time).	CNVMSPP Complaints register Site visit	CNVMSPP: Human comfort vibration criteria from the AVTG are discussed in Section 4.2 and are applied to the vibration assessment in Section 5.4.	Compliant				
C17	Vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C16.	CNVMSPP Complaints register Site visit	Not addressed in the CNVMSPP. No residential buildings within 30m of site boundary.	Not triggered	IO12: Include that there are no residential buildings within 30m of site boundary in the CNVMSPP.			
C18	The limits in conditions C16 and C17 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B17 of this consent.	CNVMSPP Complaints register Site visit	The limits in C16 and C17 apply.	Not triggered				
C19	The following trees as identified in the Arboricultural Impact Assessment for the Upgrade of Glenwood High School prepared by Eco Logical Australia dated 14 July 2022 are approved for removal: tree No.'s 154, 156, 157, 158, 159, 160, 162, 169, 170, 171, 172, 181, 182, 183, 184, 187, 185, 186, 187, 189, 190 and 581.	Glenwood High School Arboricultural Impact Assessment (Ecological, Version 6, 02/11/2021) CEMP BMSP Inspection Test Report (ITR) Site visit	Neither the trees approved for removal or the AIA are mentioned in the BMSP. Not removed to date. Carpark works. To be reviewed next audit.	Not triggered				
C20	For the duration of the construction works:			Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
C20a	(a) all trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the Arboricultural Impact Assessment prepared by Eco Logical Australia dated 14 July 2022;	Arboricultural Impact Assessment BMSP Arborist Certification of Tree Removal as part of DA-21-02007 (McArdle Arboricultural Consultancy, 31/10/2022) DA -21-02007 Tree Protection Certificate including modifications (McArdle Arboricultural Consultancy, 14/07/2022) Site visit - Appendix D: Photos 9-13	Threes approved. Only 2 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. the 14 TPZs installed, maintained and appropriate signage. The 14/07/2022 report confirms that all tree protection fencing with the changes for construction is now approved according to the DA, and tree protection measures are to be instated for the duration of construction. 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. 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 tree drip zones observed.	Compliant				
C20b	(b) all street trees immediately adjacent to the property boundary must be protected at all times during construction in accordance with Council's tree protection requirements. Any street tree, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council;	Arboricultural Impact Assessment BMSP Site visit	No existing trees along the site boundary.	Not triggered				
C20c	(c) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; and	Arboricultural Impact Assessment BMSP Site visit	No existing trees along the site boundary.	Not triggered				
C20d	(d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater. <i>Note: An inspection fee in accordance with Council's Goods and Services Pricing Schedule will be applicable for an authorised Council officer to inspect the tree protection measures implemented (if tree protection measures are required for street trees).</i>	Arboricultural Impact Assessment BMSP Site visit	Not accessed to date. Likely at the end of construction during landscaping. To be reviewed in future audits. No evidence of access to the TPZ or Cumberland Plan Woodland observed during the site visit. Appropriate fencing and signage.	Not triggered				
C21	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	CEMP Site visit	Conditions on the site were dry during the site visit. The a water cart was in use and no dust was observed. (see Appendix D, Photo 27).	Compliant				
C22	During construction, the Applicant must ensure that:	CEMP Site visit		Compliant				
C22a	(a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust;	CEMP Site visit	CEMP: Appendix 6.2: - Dust Generation Particulate Emissions (General) - Dust Generation (Demolition) - Dust Generation (Construction)	Compliant				
C22b	(b) all trucks entering or leaving the site with loads have their loads covered;	CEMP Site visit	CTPMSP: Driver Code of conduct states that all loads are to be sealed or covered when entering or leaving the site. CEMP: Not included in Appendix 6.2. No truck were observed entering/leaving the site during the site visit.	Compliant				
C22c	(c) trucks associated with the development do not track dirt onto the public road network;	CEMP Site visit	CTPMSP: Driver Code of conduct states that construction vehicle wheels shall be cleaned prior to leaving the site to prevent transport of dust, dirt, or gravel from the worksite onto the road network or pedestrian footpaths. CEMP: Not included in Appendix 6.2. CSWMSP: Section 2.1 . No tracking of dirt was observed during the site visit (see Appendix D, Photo 26).	Compliant				
C22d	(d) public roads used by these trucks are kept clean from any dust emissions associated with the project; and	CEMP Site visit	CSWMSP: Section 2.1 All public roads are to be cleaned immediately in the case that sediment is tracked onto the public roadway by vehicles leaving the construction site. No tracking of dirt was observed during the site visit (see Appendix D, Photo 25 and 26).	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
C22e	(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	CSWMSP Site visit	CEMP: Appendix 6.2: - Dust Generation Particulate Emissions (General).	Compliant				
C23	The Applicant must:			Compliant				
C23a	(a) ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site;	CEMP CH1347-D220063_VENM Addendum - Asbestos Clearance.pdf GT3633 ENV01 Rev2.pdf GT3762-ENV01.pdf CH1359-D220125_ENM Classification.pdf PCA7368-2022_VENMRPT01_21Jun22.pdf	CEMP: Appendix 6.2 Record all imported fill on Form 25.08 - Product Identification & Traceability. Does not state 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. Waste classification reports provided for the three sites from which fill is imported.	Compliant	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			
C23b	(b) keep accurate records of the volume and type of fill to be used;	Waste records- see above CEMP Glenwood HS - Import Fill Register 25.08 Imported Fill Register - GHS - 220830.pdf 25.08 Imported Fill Register - GHS - 220831.pdf 25.08 Imported Fill Register - GHS - 220901.pdf 25.08 Imported Fill Register - GHS - 220913.pdf 25.08 Imported Fill Register - GHS - 220914.pdf 25.08 Imported Fill Register - GHS - 220920.pdf 25.08 Imported Fill Register - GHS - 220921.pdf 25.08 Imported Fill Register - GHS - 221004.pdf 25.08 Imported Fill Register - GHS - 221013.pdf 25.08 Imported Fill Register - GHS - 221014.pdf 25.08 Imported Fill Register - GHS - 221017.pdf 25.08 Imported Fill Register - GHS - 221018.pdf 25.08 Imported Fill Register - GHS - 221019.pdf 25.08 Imported Fill Register - GHS - 221020.pdf 25.08 Imported Fill Register - GHS - 221027.pdf 25.08 Imported Fill Register - GHS - 221031.pdf 25.08 Imported Fill Register - GHS - 221103.pdf 25.08 Imported Fill Register - GHS - 221104.pdf 25.08 Imported Fill Register - GHS - 221108.pdf 25.08 Imported Fill Register - GHS - 221111.pdf 25.08 Imported Fill Register - GHS - 221117.pdf 25.08 Imported Fill Register - GHS - 221118.pdf 25.08 Imported Fill Register - GHS - 221119.pdf	CEMP: Appendix 6.2 Record all imported fill on Form 25.08 - Product Identification & Traceability. Imported fill registers - include the date, time, rego, material description and location imported from. Not all are complete, in particular the location e.g. 25.08 Imported Fill Register - GHS - 221013. Import Fill Register includes the source and volume of fill received.	Compliant				
C23c	(c) existing and imported fill must be compacted in accordance with Council's Work Specification – Civil; and	CEMP -see above Design Certificate CC1- Civil (SCP, 23/09/2022)	Compliance with Council's Work Specification – Civil is confirmed in the Design Certificate CC1- Civil .	Compliant				
C23d	(d) make these records available to the Certifier upon request.		Not Triggered - nil request from Certifier for import fill waste records.	Not triggered				
C24	Adequate provisions must be made to collect and discharge stormwater drainage during construction to the satisfaction of Certifier. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.		Not Triggered - nil discharge to stormwater from site; water is retained on site and leveraged for dust suppression and cleaning.	Not triggered				
C25	The Applicant must prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes, for the duration of construction.	GHS Site Induction (RCC) Training records MEET-80821 (RCC, 06/09/2022) MEET-96379 Site notices - site inspection	Emergency evacuation is covered in the site induction. All staff have participated. MEET-80821 identifies an emergency scenario was conducted on the 06/09/2022. 12 participants. Meet-96379 Plant Collision / Environmental Scenario conducted on the 07/12/2022. Site notice - see Appendix D, Photo 15).	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
C26	Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by Tocomwall dated 22 October 2021.	ACHAR Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	ACHAR Recommendations: unanticipated Aboriginal archaeological objects, sites or PAD are identified during the construction program within the impact footprints, works should cease immediately, and notify Heritage NSW If any human remains are identified during the earthworks within the impact footprints works, should cease immediately and the Police and NSW Heritage should be contacted. CEMP: Section 4.6 references the Unexpected Finds Protocol for hold points. Unexpected Finds Protocol Section states that if Aboriginal relics are discovered work will cease and Heritage NSW notified. For human remain (Section 3.6) the police are also to be notified.	Compliant				
C27	In the event that surface disturbance identifies a new Aboriginal object:	Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	Unexpected Finds Protocol Section 3.5. No unexpected Aboriginal heritage finds to date.	Compliant	Appendix 6.4 requires a complete rewrite to provide concise information in a logical order.			
C27a	(a) all works must halt in the immediate area to prevent any further impacts to the object(s);	Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	Unexpected Finds Protocol Section 3.5. No unexpected Aboriginal heritage finds to date.	Compliant				
C27b	(b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects;	Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	Unexpected Finds Protocol Section 3.5. No unexpected Aboriginal heritage finds to date.	Compliant				
C27c	(c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS;	Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	Unexpected Finds Protocol Section 3.5. No unexpected Aboriginal heritage finds to date.	Compliant				
C27d	(d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and	Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	Unexpected Finds Protocol Section 3.5. No unexpected Aboriginal heritage finds to date.	Compliant				
C27e	(e) works may only recommence with the written approval of the Planning Secretary.	Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	Unexpected Finds Protocol Section 3.5. No unexpected Aboriginal heritage finds to date.	Compliant				
C28	If any unexpected archaeological relics are uncovered during the work, then:	Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	Unexpected Finds Protocol Section 3.4. No unexpected Aboriginal heritage finds to date.	Compliant				
C28a	(a) all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary;	Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	Unexpected Finds Protocol Section 3.4. No unexpected Aboriginal heritage finds to date.	Compliant				
C28b	(b) depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW; and	Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	Unexpected Finds Protocol Section 3.4. No unexpected Aboriginal heritage finds to date.	Compliant				
C28c	(c) works may only recommence with the written approval of the Planning Secretary.	Unexpected Finds Protocol (12/12/2022)(CEMP Appendix 6.4)	Unexpected Finds Protocol Section 3.4. No unexpected Aboriginal heritage finds to date.	Compliant				
C29	All waste generated during construction must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	Site visit WMSP	WMSP: Section 7 states there will be a designated waste storage area for the disposal and storage of construction waste prior to collection. General waste and recycling bins are located around the construction site (see Appendix D, Photos 28 and 29) and no waste was observed outside the site.	Compliant				
C30	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	WMSP Bingo Monthly Waste Report	WMSP: Section 5 and 6. Waste records provided for January-October 2022 include type of waste and weight.	Compliant				
C31	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	CEMP Site visit	CEMP: Appendix 6.2 (5) Concrete Bunded washouts plastic lined.(17) Construct concrete washout pit for washout, away from stormwater drains. Send back to batch plant where possible. No alternative provided if sending back to batch plant is not possible. Not specified that concrete waste and rinse water are not disposed of on the site.	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
C32	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.	Bingo Monthly Waste Report WMSP	WMSP: Section 6 A Waste Data File must be maintained on-site and all entries are to include: • The classification of the waste • The time and date of material removed • A description of and the volume of waste collected • The location and name of the waste facility that the waste is transferred to • The vehicle registration and the name of the waste contractor's company Section 1 Table 2 incorrectly references Sections 8 and 9. Waste records provided for January-October 2022 include type of waste and weight.	Compliant	IO14: Update WMSP Section 1 Table 2 to reference Section 6.			
C33	The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance with the requirements of the relevant legislation, codes, standards and guidelines.		Not triggered - nil asbestos or contamination finds to date.	Not triggered				
C34	The Applicant must ensure that all external lighting is constructed and maintained in in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	CEMP	CEMP: Appendix 6.2 (20). No external construction lighting persists outside of the SSD construction hours. Not triggered for operational lighting.	Not triggered				
C35	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements 2020.	This Audit	This audit has been conducted in compliance with IAPPAR 2020.	Compliant				
C36	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	DPE Correspondence: Glenwood High School Upgrade (SSD-23512960) Independent Audit - Auditor Approval dated 19/11/2022.	Approval for the independent auditor was not submitted until 17/11/2022 and approved on the 19/11/2022, after commencement of the IEA.	Non-compliant		NC5		
C37	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (2020), upon giving at least 4 week's notice (or timing) to the Applicant of the date upon which the audit must be commenced.		No changes requested by the Planning Secretary.	Not triggered				
C38	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must:	This Audit	First construction audit. To be reviewed in the next IEA.	Not triggered				
C38a	(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;	This Audit	First construction audit. To be reviewed in the next IEA.	Not triggered				
C38b	(b) submit the response to the Planning Secretary; and	This Audit	First construction audit. To be reviewed in the next IEA.	Not triggered				
C38c	(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.	This Audit	First construction audit. To be reviewed in the next IEA.	Not triggered				
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 Independent Audit Post Approval Requirements (2020) unless otherwise agreed by the Planning Secretary.	This Audit	First construction audit.	Not triggered				
C40	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020), 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.		Not triggered.	Not triggered				
C41	Operational readiness work must not commence on site until the following details have been submitted to the Certifier:		Not triggered.	Not triggered				
C41a	(a) a plan and description of the area(s) of the site to be used for operational readiness work (including pedestrian access) and areas still under construction (including construction access);		Not triggered.	Not triggered				
C41b	(b) the maximum number of staff to be involved in operational readiness work on site at any one time;		Not triggered.	Not triggered				
C41c	(c) arrangements to ensure the safety of school staff on the site, including how:		Not triggered.	Not triggered				
C41c(i)	(i) areas to be used for operational readiness work will be clearly and securely separated from the areas of the site still under construction;		Not triggered.	Not triggered				
C41c(ii)	(ii) pedestrian access to and within the site will be managed to ensure no conflict with construction vehicle movements; and		Not triggered.	Not triggered				
C41d	(d) access and parking arrangements to minimise impacts on the surrounding street network having regard to number of staff involved in operational readiness work on site at any one time and parking arrangements for construction workers on site.		Not triggered.	Not triggered				
C42	Operational readiness work must only be undertaken in accordance with the details submitted under condition C41 and the following requirements:		Not triggered.	Not triggered				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
C42a	(a) no more than 27 staff are involved in operational readiness work;		Not triggered.	Not triggered				
C42b	(b) no students or parents are permitted; and		Not triggered.	Not triggered				
C42c	(c) the Applicant has implemented appropriate arrangements to ensure the safety of school staff.		Not triggered.	Not triggered				
C43	If any expected contaminated material is encountered during construction work which requires remediation and/or ongoing on-site management of soil or groundwater contamination, then the following requirements must be satisfied:	CEMP	(Assume this condition refers to 'unexpected' contamination). CEMP: Appendix 6.2.	Not triggered				
C43a	(a) the Applicant must engage a NSW EPA-accredited Site Auditor to confirm the appropriateness of the site for the proposed use. The Applicant must obtain from a NSW EPA-accredited Site Auditor a Section A2 Site Audit Statement accompanied by an Environmental Management Plan (if required to manage ongoing contaminants) prepared by a certified consultant and submit it to the Planning Secretary and relevant Council for information no later than one month before the commencement of operation; and	CEMP	CEMP: Appendix 6.2 (7) Sign off by Site Auditor may be required to validate clean-up. Appendix 6.4 Unexpected Finds Protocol: Section 3.3.1.	Not triggered				
C43b	(b) the development must not be used for the purpose approved under the terms of this consent until a Site Audit Statement determines the land is suitable for that purpose and any conditions on the Site Audit Statement have been complied with.	CEMP	CEMP: Appendix 6.4 Unexpected Finds Protocol: Section 3.3.1.	Not triggered				
Part D	PRIOR TO OPERATION							
D1	At least one month before commencement of operation, the date of commencement of the operation of the development must be notified to the Planning Secretary in writing. If the operation of the development is to be staged, the Planning Secretary must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.			Not triggered				
D2	Prior to commencement of operation, the Applicant must provide the Certifier with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.			Not triggered				
D3	D3. The Applicant must provide to the Planning Secretary a copy of the documentation given to the Certifier within seven days after the Certifier accepts it.			Not triggered				
D4	Prior to the commencement of operation, works-as-executed plans signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifier.			Not triggered				
D5	D5. Prior to the commencement of operation, certification from a Registered Engineer/s must be submitted to the satisfaction of the Certifier, certifying that:			Not triggered				
D5a	(a) the on-site detention system (OSD) will perform to meet the OSD requirements in accordance with the approved design plans required by condition B31;			Not triggered				
D5b	(b) the structures associated with the OSD have been constructed to withstand all loads likely to be imposed them during their lifetime; and			Not triggered				
D5c	(c) the Stormwater Quality Control System will function effectively in accordance with Council's Engineering Guide for Development, Development Control Plan Part J- Water Sensitive Urban Design and Integrated Water Cycle Management. Note: A copy of the final documents that identifies the correct information (location, types, model and asset numbers) shall be submitted to Council's Compliance Officer at WSUD@blacktown.nsw.gov.au			Not triggered				
D6	The installation of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 1 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires' Disease.			Not triggered				
D7	Prior to the commencement of operation, the Applicant must submit evidence from a suitably qualified practitioner to the Certifier that demonstrates that installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers and:			Not triggered				
D7a	(a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and			Not triggered				
D7b	(b) has been mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.			Not triggered				
D8	Prior to commencement of operation, the Applicant must provide evidence to the satisfaction of the Certifier that the installation and performance of the mechanical ventilation systems complies with:			Not triggered				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
D8a	AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and other relevant codes; and			Not triggered				
D8b	(b) any dispensation granted by Fire and Rescue NSW.			Not triggered				
D9	Prior to the commencement of operation, the Applicant must submit evidence to the Certifier that the noise mitigation recommendations in the Glenwood High School Noise and Vibration Impact Assessment dated 12 November 2021 and prepared by AECOM Australia Pty Ltd have been incorporated into the design of mechanical plant and equipment to ensure the development will not exceed the project noise trigger levels identified in the Glenwood High School Noise and Vibration Impact Assessment.			Not triggered				
D10	Prior to commencement of occupation, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety Certificate must be submitted to the relevant authority and Council. The Fire Safety Certificate must be prominently displayed in the building.			Not triggered				
D11	Prior to the commencement of occupation of the relevant parts of any new or refurbished buildings, a Structural Inspection Certificate or a Compliance Certificate must be submitted to the Certifier. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the Planning Secretary and the Council after:			Not triggered				
D11a	(a) the site has been periodically inspected and the Certifier is satisfied that the structural works is deemed to comply with the final design drawings; and			Not triggered				
D11b	(b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.			Not triggered				
D12	Prior to the commencement of operation, the Applicant is to obtain a certificate from a suitably qualified tradesperson, certifying that the kitchen, food storage and food preparation areas have been fitted in accordance with the AS 4674 Design, construction and fit-out of food premises and provide evidence of receipt of the certificate to the satisfaction of the Certifier.			Not triggered				
D13	Prior to the commencement of operation, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must:			Not triggered				
D13a	(a) ascertain whether the construction works created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition B6 of this consent;			Not triggered				
D13b	(b) have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads).			Not triggered				
D13c	(c) be submitted to the Certifier;			Not triggered				
D13d	(d) be forwarded to Council for information; and			Not triggered				
D13e	(e) be provided to the Planning Secretary when requested.			Not triggered				
D14	Unless the Applicant and the relevant public authority agree otherwise, the Applicant must:			Not triggered				
D14a	(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the construction works; and/or			Not triggered				
D14b	(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development; and/or			Not triggered				
D14c	(c) pay compensation for the damage as agreed with the owner of the public infrastructure Notes: • This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions of this consent. • The cost of repairing any damage caused to Council assets must be in accordance with Council's Goods and Services Pricing Schedule (in effect at the time the Post-Construction Dilapidation Report was prepared).			Not triggered				
D15	Prior to the commencement of operation, the cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Site as a result of construction works associated with the approved development must be met in full by the Applicant. Note: the cost of repairing any damage caused to Council assets must be in accordance with Council's Goods and Services Pricing Schedule (in effect at the time the Post-Construction Dilapidation Report was prepared).			Not triggered				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
D16	Where a pre-construction survey has been undertaken in accordance with condition B8, prior to the commencement of operation the Applicant must engage a suitably qualified and experienced expert to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must:			Not triggered				
D16a	(a) document the results of the post-construction survey and compare it with the pre-construction survey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition B8;			Not triggered				
D16b	(b) be provided to the owner of the relevant buildings surveyed;			Not triggered				
D16c	(c) be provided to the Certifier; and			Not triggered				
D16d	(d) be provided to the Planning Secretary when requested.			Not triggered				
D17	Where the Post-Construction Survey Report determines that damage to the identified property occurred as a result of the construction works, the Applicant must repair, or pay the full costs associated with repairing the damaged buildings, within an agreed timeline between the owner of the identified property and the Planning Secretary. Alternatively, the Applicant may pay compensation for the damage as agreed with the property owner.			Not triggered				
D18	Prior to the commencement of operation, the Applicant must complete the upgrading of Glenwood Park Drive footpath as approved by condition B28 and the Stormwater Drainage Connection as approved by condition B29, to the satisfaction of Council.			Not triggered				
D19	Prior to the commencement of operation, compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the Certifier:			Not triggered				
D19a	(a) the provision of a minimum of 15 additional student/visitor bicycle parking spaces;			Not triggered				
D19b	(b) the provision of a minimum of 13 additional staff bicycle parking spaces which are weather protected and lockable;			Not triggered				
D19c	(c) the total number of existing bicycle spaces on-site plus the additional 28 spaces required must be no less than 84;			Not triggered				
D19d	(d) the layout, design and security of bicycle facilities must comply with the minimum requirements of the latest version of AS 2890.3:2015 Parking facilities - Bicycle parking, and be located in easy to access, well-lit areas that incorporate passive surveillance;			Not triggered				
D19e	(e) the provision of end-of-trip facilities for staff; and			Not triggered				
D19f	(f) appropriate pedestrian and cyclist advisory signs are to be provided. Note: All works/regulatory signposting associated with the proposed development shall be at no cost to the relevant roads authority.			Not triggered				
D20	Prior to the commencement of operation, a School Transport Plan (STP), must be submitted to the satisfaction of the Planning Secretary. The plan must:			Not triggered				
D20a	(a) be prepared by a suitably qualified consultant in consultation with Council and TfNSW;			Not triggered				
D20b	include arrangements to promote the use of active and sustainable transport modes, including:			Not triggered				
D20b(i)	(i) objectives and modes share targets (i.e. Site and land use specific, measurable and achievable and timeframes for implementation);			Not triggered				
D20b(ii)	(ii) specific tools and actions to help achieve the objectives and mode share targets;			Not triggered				
D20b(iii)	(iii) details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development; and			Not triggered				
D20c	(c) include operational transport access management arrangements, including:			Not triggered				
D20c(i)	(i) detailed pedestrian analysis including the identification of safe route options to identify the need for management measures such as staggered school start and finish times to ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish;			Not triggered				
D20c(ii)	(ii) the location of all car parking spaces on the school campus and their allocation (i.e. staff, visitor, accessible, emergency, etc.);			Not triggered				
D20c(iii)	(iii) the location and operational management procedures of the drop-off and pick-up parking, including staff management/traffic controller arrangements;			Not triggered				
D20c(iv)	(iv) the location and operational management procedures for the drop-off and pick-up of students by buses and coaches including staff management/traffic controller arrangements;			Not triggered				
D20c(v)	(v) delivery and services vehicle and bus access and management arrangements;			Not triggered				
D20vi	(vi) management of approved access arrangements;			Not triggered				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
D20c(vii)	(vii) potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing drop-off and pick-up zones;			Not triggered				
D20viii	(viii) car parking arrangements and management associated with the proposed use of school facilities by community members; and			Not triggered				
D20d	(d) measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the plan; and			Not triggered				
D20e	(e) a monitoring and review program.			Not triggered				
D21	Prior to commencement of operation, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.			Not triggered				
D22	Prior to the commencement of operation, an Stormwater Operation and Maintenance Plan (SOMP) is to be submitted to Council and the Certifier. The SOMP must ensure the proposed stormwater quality measures remain effective and contain the following:			Not triggered				
D22a	(a) maintenance schedule of all stormwater quality treatment devices;			Not triggered				
D22b	(b) record and reporting details;			Not triggered				
D22c	(c) relevant contact information;			Not triggered				
D22d	(d) Work Health and Safety requirements; and			Not triggered				
D22e	(e) measures to ensure the following percentage reductions in post development average annual load of pollutants:			Not triggered				
D23	Prior to the commencement of operation, way-finding signage and signage identifying the location of staff car parking must be installed.			Not triggered				
D24	D24. Prior to the commencement of operation, bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas.			Not triggered				
D25	D25. Prior to the commencement of operation, a coloured interpretive signage of a minimum A1 size must be installed to highlight the water conservation, on-site detention and water quality processes. The sign must be located within proximity to the rain-water tanks and appropriately fixed to a wall or other supporting structure. Note: Refer to Chapter 14 of Council's WSUD developer handbook for sign design requirements			Not triggered				
D26	Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Certifier. The Waste Management Plan must:			Not triggered				
D26a	(a) detail the type and quantity of waste to be generated during operation of the development;			Not triggered				
D26b	(b) ensure waste pick collection times are in accordance with the EIS and SRTS with no collection to occur before 6am or after 6pm on the day of collection, and does not occur within the following peak traffic hours (school days):			Not triggered				
D26b(i)	(i) 7:45am to 8:45am; and			Not triggered				
D26b(ii)	(ii) 2:15pm to 3:15pm;			Not triggered				
D26c	(c) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009);			Not triggered				
D26d	(d) detail the materials to be reused or recycled, either on or off site; and			Not triggered				
D26e	(e) include the Management and Mitigation Measures included in EIS.			Not triggered				
D27	Prior to the commencement of operation, the Biodiversity Management Plan (excluding sections relating to the construction phase) prepared by Kleinfelder Australia Pty Ltd and dated 20 April 2022 must be amended in consultation with the EHG and submitted to the Planning Secretary for approval. The amended Biodiversity Management Plan must meet the following requirements:			Not triggered				
D27a	(a) be consistent with the recommendations of the Biodiversity Development Assessment Report including that the Biodiversity Management Plan must be implemented for the duration of occupation of the development; and			Not triggered				
D27b	(b) update Sections 1.4.1 and Section 3.1.2 so that the objectives and performance criteria are measurable.			Not triggered				
D28	Prior to the commencement of operation, landscaping of the site must be completed in accordance with landscape plan(s) listed in condition A2(d) and as amended by condition B3.			Not triggered				
D29	D29. Prior to the commencement of operation, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping on-site and submit it to the Certifier. The plan must:			Not triggered				
D29a	(a) describe the ongoing monitoring and maintenance measures to manage revegetation and landscaping; and			Not triggered				
D29b	be consistent with the Applicant's Management and Mitigation Measures at Appendix C in the EIS.			Not triggered				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
D30	Prior the commencement of the operation, a Flood Emergency Management Plan must be submitted to the Certifier that:			Not triggered				
D30a	(a) has been prepared by a suitably qualified and experienced person(s);			Not triggered				
D30b	(b) is generally consistent with the Preliminary Flood Emergency Management Plan (Ref: 6393, Rev 4), prepared by Enstruct and dated 9 June 2022;			Not triggered				
D30c	(c) has been prepared in consultation with NSW State Emergency Service noting the limitations described in the NSW Floodplain Development Manual Appendix N, section N7;			Not triggered				
D30d	(d) incorporates and complies with all advice provided by NSW State Emergency Service at D30(b);			Not triggered				
D30e	(e) addresses the provisions of the Floodplain Risk Management Guidelines (EHG);			Not triggered				
D30f	(f) incorporates the following:			Not triggered				
D30f(i)	(i) the flood emergency management protocols for the operational phase of the development;			Not triggered				
D30f(ii)	(ii) predicted flood levels within the site and within the adjoining road system and other public land expected to be used by students, staff and visitors;			Not triggered				
D30f(iii)	(iii) details strategies such as early or pre-emptive school closure, and other management requirements where relevant and where consistent with SES advice;			Not triggered				
D30f(iv)	(iv) provides clear emergency management triggers and responses;			Not triggered				
D30f(v)	(v) details of flood warning time and flood notification;			Not triggered				
D30f(vi)	(vi) details assembly points and flood free routes where required;			Not triggered				
D30f(vii)	(vii) identifies clear roles and responsibilities for emergency flood management within the school;			Not triggered				
D30f(viii)	(viii) recognise that the NSW SES is the lead combat agency for floods and state that any flood response directive issued by the SES must be followed			Not triggered				
D30f(ix)	(ix) provide clear messaging and communication protocols;			Not triggered				
D30f(x)	(x) includes clear requirements that the Plan be regularly reviewed; and			Not triggered				
D30g	(g) include details of awareness training for employees, contractors, visitors, students and caregivers and induction of new staff members.			Not triggered				
D31	D31. A copy of the Flood Emergency Management Plan (required by condition D30) must be provided to the Planning Secretary for information.			Not triggered				
D32	Prior to the commencement of operation, a Registered Engineer/s or licenced plumber is to certify that all the toilets and urinals are capable of being supplied by Non-Potable Water Supply and that there is no mixing with the potable water supply.			Not triggered				
Part E	POST OCCPATION							
E1	All plant and equipment used on site must be maintained in a proper and efficient condition operated in a proper and efficient manner.	Site visit		Not triggered				
E2	The operation and maintenance of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 2 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires' Disease.			Not triggered				
E3	The Community Communication Strategy, as submitted to the Certifier, must be implemented for a minimum of 12 months following the completion of construction.	Community Communication Strategy		Not triggered				
E4	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Glenwood High School Noise and Vibration Impact Assessment dated 12 November 2021 and prepared by AECOM Australia Pty Ltd.	CNVMSP		Not triggered				
E5	E5. The Applicant must undertake short term noise monitoring in accordance with the Noise Policy for Industry (2017) where valid data is collected following the commencement of use of each stage of the development. The monitoring program must be carried out by an appropriately qualified person and a monitoring report must be submitted to the Planning Secretary within two months of commencement use of each stage of the development or other timeframe agreed to by the Planning Secretary to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in Glenwood High School Noise and Vibration Impact Assessment dated 12 November 2021 and prepared by AECOM Australia Pty Ltd. Should the noise monitoring program identify any exceedance of the recommended noise levels referred to above, the Applicant is required to implement appropriate noise attenuation measures so that operational noise levels do not exceed the recommended noise levels or provide attenuation measures at the affected noise sensitive receivers.	CNVMSP		Not triggered				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
E6	All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.	site visit		Not triggered				
E7	The School Transport Plan required by condition D20 of this consent must be updated annually and implemented unless otherwise agreed by the Planning Secretary.	School Transport Plan		Not triggered				
E8	Unless otherwise agreed by the Planning Secretary, within 12 months of commencement of operation, Green Star certification must be obtained demonstrating the development achieves a minimum 5 star Green Star Design & As Built rating. If required to be obtained, evidence of the certification must be provided to the Certifier and the Planning Secretary. If an alternative certification process has been agreed to by the Planning Secretary under condition B11, evidence of compliance of implementation must be provided to the Planning Secretary and Certifier.	Green Star registration		Not triggered				
E9	Notwithstanding condition D7, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.	Site visit		Not triggered				
E10	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition D28 for the duration of occupation of the development.	Landscape Management Plan		Not triggered				
E11	The Applicant must comply with the approved Biodiversity Management Plan required by condition D27 for the duration of occupation of the development	BMSP		Not triggered				
E12	The Applicant must comply with the approved Stormwater Operation and Maintenance Plan (SOMP) required by condition D22 for the duration of occupation of the development	Stormwater Operation Maintenance Plan		Not triggered				
Appendix 1								
AN1	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	Additional permits, licences, modifications	Not Triggered - No additional permits required for works to-date	Not triggered				
AN2	For work costing \$25,000 or more, a Long Service Levy must be paid. For further information please contact the Long Service Payments Corporation Helpline on 131 441.	Long Service Corporation correspondence: Levy Receipt (24/06/2022)	Long Service Levy paid.	Compliant				
AN3	Any advice or notice to the consent authority must be served on the Planning Secretary.	Notifications to Planning Secretary	All notifications from NSW Education have been made to the Planning Secretary.	Compliant				
AN4	The works that are the subject of this application must be designed and constructed to provide access and facilities for people with a disability in accordance with the BCA. Prior to the commencement of construction, the Certifier must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.	BUILDING CODE OF AUSTRALIA 2019 AMENDMENT 1 – 100% FINAL DESIGN DEVELOPMENT BCA REPORT (Philip Chung, 30/09/2022) 100% DD Access Report Glenwood High School (Philip Chun, 30/09/2022)	The Access Report provides a review of the proposed development documentation against the various access requirements that apply to the type of development. All relevant requirements are assessed as 'Can Comply', other than 30% luminance at doorways, which will be assessed during subsequent design development. Note PCA assessment of BCA Report is intended to be captured under a separate CDVC.	Compliant				
AN5	Prior to the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Endeavour Energy correspondence: ULL3356 – Connection of Load Application: LOT 5227, DP 868693, 85 GLENWOOD PARK DRIVE & FORMAN AVENUE, GLENWOOD dated 09/03/2022 Jemena response Sydney Water Subdivider/Developer Compliance Certificate (23/09/2022) (SSDA works) Sydney Water Building Plan Approved - Subject to Requirements (24/06/2022) (REF works)	Endeavour Energy reviewed and certified the design package (certified drawing 524449A attached). Jemena: no objection. Sydney Water approvals.	Compliant				
AN6	Prior to the commencement of above ground works written advice must be obtained from the electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.	RE_ GHS - SSD-23512960 Condition B6 (Blacktown City Council) - Response.msg RE_ GHS - SSD-23512960 Condition B6 (Jemena) - Response.msg RE_ GHS - SSD-23512960 Condition B6 (Telstra) - Response.msg	Note telecommunications service provider approval is ongoing and captured under a separate CDVC. Jemena response: no objection for your proposed works at 85 Forman Avenue Glenwood. Telstra response: contact details should NBN works be required. Not conducted to date - to be reviewed in Audit 2. BCC: request was passed on.	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
AN7	All roads and traffic facilities must be designed to meet the requirements of Council or TfNSW (whichever is applicable). The necessary permits and approvals from the relevant road authority must be obtained prior to the commencement of road or pavement construction works.		Not Triggered - No road or traffic facilities are to be completed as part of GHS Project works. Footpath works will be captured as a separate CDVC.	Not triggered				
AN8	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.		Not Triggered - nil works impacting on road traffic flows.	Not triggered				
AN9	To protect the safety of work personnel and the public, the work site must be adequately secured to prevent access by unauthorised personnel, and work must be conducted at all times in accordance with relevant SafeWork requirements	Site visit Incident log	The construction site is surrounded by a security fence with a lockable gate at the access driveway. No security breaches were identified in the incident log.	Compliant				
AN10	The Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.		Not Triggered - nil hoarding over Council footways or road reserves.	Not triggered				
AN11	The Applicant must consult with SafeWork NSW concerning the handling of any asbestos waste that may be encountered during construction. The requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 – 'Transportation and management of asbestos waste' must also be complied with.		No asbestos identified.	Not triggered				
AN12	At least eight weeks prior to the commencement of operation, the Applicant must submit the following details to TfNSW and obtain authorisation to install School Zone signs and associated pavement markings, and / or removal / relocation of any existing Speed Limit signs:	Site Visit		Not triggered				
AN12a	(a) a copy of the conditions of consent;			Not triggered				
AN12b	the proposed school commencement/opening date;			Not triggered				
AN12c	(c) two sets of detailed design plans showing the following:	Detailed Design		Not triggered				
AN12c(i)	(i) accurate Site boundaries;	Detailed Design		Not triggered				
AN12c(ii)	(ii) details of all road reserves, adjacent to the Site boundaries;	Detailed Design		Not triggered				
AN12c(iii)	(iii) all proposed access points from the Site to the public road network and any additional conditions imposed/proposed on their use;	Detailed Design		Not triggered				
AN12c(iv)	(iv) all existing and proposed pedestrian crossing facilities on the adjacent road network;	Detailed Design		Not triggered				
AN12c(v)	(v) all existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings); and	Detailed Design		Not triggered				
EE12c(vi)	(vi) all existing and proposed street furniture and street trees.			Not triggered				
AN13	The owner must submit to Council an Annual Fire Safety Statement, each 12 months after the final Safety Certificate is issued. The certificate must be on, or to the effect of, Council's Fire Safety Statement.		Not Triggered - Annual Fire Safety Statement submissions to Council managed by private FM. Final Safety Certificate to be provided as part of Practical Completion process.	Not triggered				
AN14	All compliance certificate(s) must certify that the relevant work has been completed in accordance with the pertinent Development Consent. The inspection compliance certificate(s) can only be issued by Council or an accredited certifier, under Part 4A of the Environmental Planning and Assessment Act 1979 (as amended).		Not Triggered - No completed works or associated completion certificates have been issued to-date. This will be captured as part of the PC process	Not triggered				
AN15	All inspection(s) required by this consent for any engineering works that are approved under the Roads Act 1993 or Local Government Act 1993 must be made by Council's Development Overseers. Council's Development Overseers may be contact on 02 9839 6568 between 6am – 7am, Monday to Friday with a minimum 24 hour notice.		Noted. No inspections conducted at the time of the audit.	Not triggered				
Appendix 2								
1	A written incident notification addressing the requirements set out below must be emailed to the Planning Secretary through the major projects portal within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition A26 or, having given such notification, subsequently forms the view that an incident has not occurred.	Major Projects correspondence: confirmation of receipt of Incident Notification (12/10/2022) Documents associated with the incident report issued on the 12/10/2022. GHS - Incident Report Register.pdf RCC correspondence (to Jacobs); GHS - Service Strike Incident, dated 06/10/2022 RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2022	One incident to date which occurred on the 06/10/2022. RCC correspondence indicates that Jacobs was notified of the incident on the 06/10/2022, six days before the Incident Notification (under condition A26) was lodged with DPE on the 12/10/2022. A suite of documents were issued with the notification including the incident report, photographs and evidence of scans. This was sufficient to meet the requirements of the written notification under conditions A27 and Appendix 2 -2. A more detailed incident report by RCC dated 17/10/2022, was issued to DPE on the 18/10/2022.	Compliant				
2	2. Written notification of an incident must:			Compliant				
2a	(a) identify the development and application number;	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2022	Application number stated.	Compliant				

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/ IO	Noncompliance ID	Proposed Action Due Date	Proponent's Proposed Action/Action taken/Response
2b	(b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2023	Details provided.	Compliant				
2c	(c) identify how the incident was detected;	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2024	Details provided.	Compliant				
2d	(d) identify when the applicant became aware of the incident;	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2025	Details provided.	Compliant				
2e	(e) identify any actual or potential non-compliance with conditions of consent;	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2026	Details provided.	Compliant				
2f	(f) describe what immediate steps were taken in relation to the incident;	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2027	Details provided.	Compliant				
2g	(g) identify further action(s) that will be taken in relation to the incident; and	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2028	Details provided.	Compliant				
2h	(h) identify a project contact for further communication regarding the incident.	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2029	The RCC Incident Report under A27 is dated 17/10/2022, 11 days after the applicant became aware of the incident.	Compliant				
3	3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2030	The RCC Incident Report under A27 is dated 17/10/2022, 11 days after the incident occurred.	Compliant				
4	4. The Incident Report must include:	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2031		Compliant				
4a	(a) a summary of the incident;	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2032	Details provided.	Compliant				
4b	(b) outcomes of an incident investigation, including identification of the cause of the incident;	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2033	Details provided.	Compliant				
4c	(c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2034	Details provided.	Compliant				
4d	(d) details of any communication with other stakeholders regarding the incident.	Documents associated with the incident report issued on the 12/10/2022. RCC correspondence: Unknown Services Strike (SSD-23512960, Condition A27), dated 17/10/2035	Details provided.	Compliant				

APPENDIX F Audit Declaration Form

Independent Audit Declaration Form

Project Name: Glenwood High School Upgrade

Consent Number: SSD 23512960

Proponent:

Title of Audit: Independent Environmental Audit 1

Date: 19/01/2023

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) *The Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor: Denise Day
Master Environmental Auditor, Arcadis

Signature:





Arcadis Australia Pacific Pty Ltd
Level 16, 580 George Street Sydney NSW 2000 Australia
Tel: +61 2 8907 9000
www.arcadis.com