



ALEXANDRIA PARK COMMUNITY SCHOOL – SSD 8373

**INDEPENDENT AUDIT REPORT**

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## Executive Summary

The NSW Department of Education – Schools Infrastructure NSW are responsible for delivering the Alexandria Park Community School Redevelopment (APCS, or the Project). The Project involves a staged upgrade to the school to accommodate 1,000 primary students and 1,200 secondary students.

Consent for the Project was granted on 11 February 2019, State Significant Development (SSD) 8373, subject to a number of Conditions of Consent (CoC).

The objective of this Independent Audit is to satisfy SSD 8373 Schedule 2, CoC C41. It requires that Independent Audits of the development be carried out in accordance with Project's Independent Audit Program and the *Independent Audit Post Approval Requirements* (Department 2018). The Independent Audit seeks to verify compliance with the relevant CoCs and assess the effectiveness of environmental management on the Project.

This Audit Report presents the findings from the first Independent Audit for the construction period, covering the period of the granting of consent through to June 2019.

Savills have been appointed as the client representative on behalf of School Infrastructure NSW. Richard Crookes Construction (RCC) are the principal contractor. Construction works began 29 April 2019. Works undertaken to date include site establishment, survey and archeological investigations, hazardous materials removal and demolition.

The overall outcome of the Independent Audit was positive. Compliance records were very well organised and available at the time of the site inspection and interview with Savills and RCC personnel on 4 June 2019. Relevant environmental and compliance monitoring records are being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements.

There were 107 CoCs and 24 Construction Environmental Management Plan and Sub-plan mitigation measures assessed. There were three non-compliances identified against the CoC. The non-compliances related to omissions of required information within Project documentation, predominantly in relation to consultation with identified stakeholders.

There were no non-compliances identified against the assessed mitigation measures within the Project's strategies and plans.

There were three observations identified in relation to the CoC, the Construction Noise and Vibration Management Sub-Plan and the Construction Waste Management Sub-Plan. These observations related to noise monitoring, and the adequacy of the Sub-Plans.

Detailed findings are presented in Section 3. Actions proposed by the Project team to address the findings of this Independent Audit are set out in Section 4.

The overall outcome of the Independent Audit was indicative of a high degree of compliance and environmental performance by Savills, RCC and their contractors carrying out the works. The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the Independent Audit.

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## 1. Introduction

### 1.1 The Project

The NSW Department of Education – Schools Infrastructure are responsible for delivering the Alexandria Park Community School Redevelopment (APCS, or the Project). The Project site is located on approximately 2.83ha of land at 7 – 11 Park Road, Alexandria, 2.75km south of the Sydney Central Business District. The Project location is presented in Figure 1.



**Figure 1: APCS location (modified from GoogleEarth, 2019).**

The Project involves an upgrade to the school to accommodate 1,000 primary students and 1,200 secondary students. The Project comprises:

- Staged demolition of all existing buildings on-site, including the temporary pop-up schools
- Remediation of specific areas of the site containing contaminated fill
- Construction of multiple school buildings of up to five stories, arranged along the western and southern parts of the site comprising a variety of classrooms, learning spaces, administration spaces, library and canteen
- Construction of a sports hall, outdoor sports courts, synthetic sports field, play areas and a Covered Outdoor Learning Space (COLA)
- Construction of a community centre, pre-school and parking facilities
- Landscaping, utility adjustments and ancillary works
- Operation of the upgraded school.

During the construction the existing students and staff will be accommodated through the establishment of two temporary schools comprising of demountable classroom and supporting spaces and facilities. The existing school hours will remain unchanged.

The Project was granted consent under Section 4.38 of the *Environmental Planning and Assessment Act 1979* on 11 February 2019, State Significant Development (SSD) 8373, subject to a number of conditions.

Savills have been appointed as the client representative on behalf of Schools Infrastructure NSW. Richard Crookes Construction (RCC) are the principal contractor. Construction works began 29 April 2019. Works undertaken to date include site establishment, survey and archeological investigations, hazardous materials removal and demolition.

## 1.2 Approval requirements

Conditions of Consent (CoC) C38 – C43 of Schedule 2 of SSD 8373 set out the requirements for undertaking Independent Audits (IAs or audit). The CoCs give effect to the Department's *Independent Audit Guideline Post Approval Requirements, 2018* (IAPAR).

## 1.3 The audit team

In accordance with Schedule 2, CoC C38 and Section 3.1 of the IAPAR, Independent Auditors must be suitably qualified, experienced and independent of the Project, and appointed by the Planning Secretary.

The Audit Team comprises:

- Derek Low (Auditor Lead): Masters of Environmental Engineering Management, Exemplar Global Certified Principal Environmental Auditor (Certificate No 114283)
- Steve Fermio (Auditor): Bachelor of Science (Hons), Exemplar Global Certified Principal Environmental Auditor (Certificate No 110498)

Approval of the Audit Team was provided by the Department on 1 May 2019. The letter is presented in Appendix C.

## 1.4 The objectives of the audit

The objective of this IA is to satisfy SSD 8373 Schedule 2, CoC C41. It states:

*Independent Audits of the development must be carried out in accordance with:*

- a) *the Independent Audit Program submitted to the Department and the Certifying Authority under condition C38 (sic) of this consent; and*



*b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018)*

The IA Program was prepared in accordance with the IAPAR and submitted to the Department and the Certifying Authority within four weeks of the date notified for the commencement of construction as required by CoC C39. The IA Program (and CoC C40) specifies that the first IA must be undertaken within eight weeks of commencement of construction.

The IAPAR sets out the scope, methodology and reporting requirements for IAs.

This IA seeks to fulfill the requirements of CoC C41, verify compliance with the relevant CoCs and assess the effectiveness of environmental management on the Project.

### **1.5 The audit scope**

This IA relates to the Project works from the granting of consent (11 February 2019) through to June 2019. Only sites establishment and Stage 1 construction had occurred to date.

The scope of the Audit comprises:

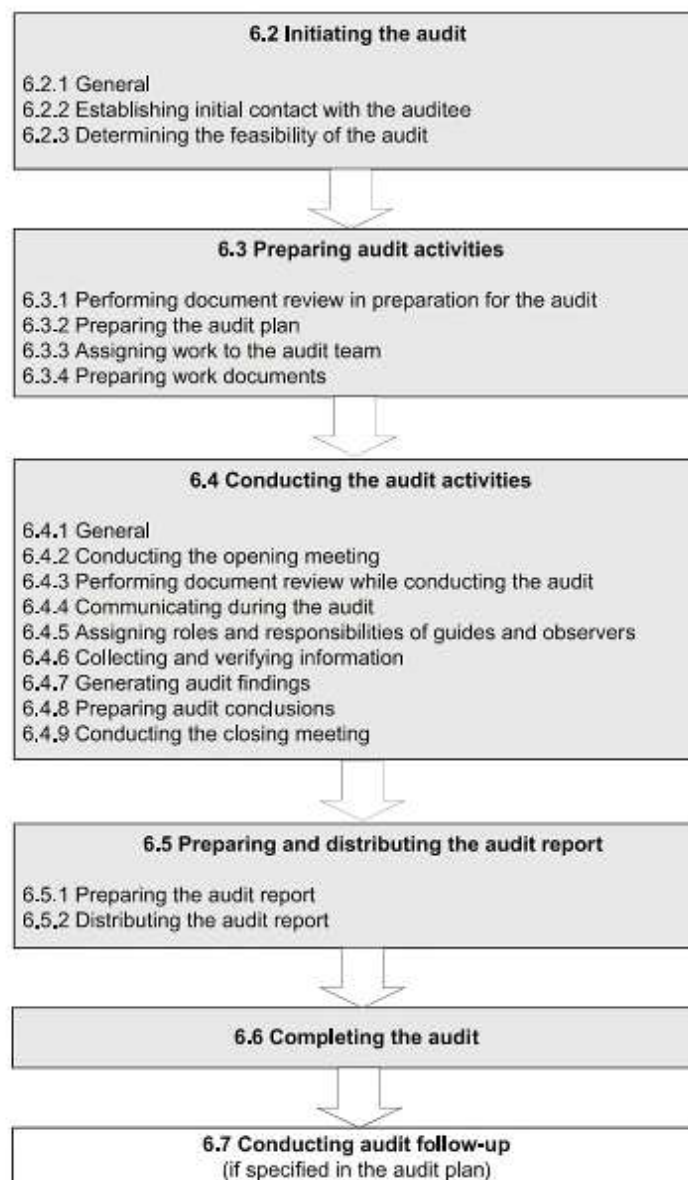
- an assessment of:
  - CoCs applicable to the phase of the development that is being audited
  - post approval documents prepared to satisfy the CoCs, including an assessment of the implementation of Environmental Management Plans and Sub-plans
  - all environmental licences and approvals applicable to the development (excluding environmental protection licences issued under the *Protection of the Environment Operations Act 1997*).
- an assessment of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - actual impacts compared to predicted impacts documented in the environmental impact assessment.
  - the physical extent of the development in comparison with the approved boundary, and any potential off-site impacts
  - incidents, non-compliances and complaints that occurred or were made during the audit period
  - 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
  - feedback received from the Department, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period
- a review of the status of implementation of previous Independent Audit findings, recommendations and actions (if any)

- a high-level review of the project's environmental management systems, including assessment of any third party certification of them, the type, nature and scope of the systems having regard to the nature and scale of the development, and the implementation of the systems.
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- details of any other matters considered relevant by the Auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

## 2. Audit methodology

### 2.1 Audit process

The IA was conducted in a manner consistent with AS/NZS ISO 19011.2014 – Guidelines for Auditing Management Systems and the methodology set out in the Department’s IAPAR. An overview of the audit activities, as specified in the standard, is presented in Figure 2.



**Figure 2: Audit activities overview (AS/NZS ISO 19011:2014).** Subclause numbering refers to the relevant subclauses in the Standard.

### 2.1.1 Audit initiation and scope development

Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditee
- Confirm the audit team
- Confirm the audit purpose, scope and criteria.

On 21 May 2019 WolfPeak consulted with the Department, the City of Sydney Council, the Office of Environment and Heritage, the Environment Protection Authority and Transport for NSW, to obtain their input into the scope of the IA in accordance with Section 3.2 of the IAPAR. The consultation records are presented in Appendix D.

A summary of the key issues and areas of focus raised by the stakeholders is presented in Table 1. The scope of the IA was reviewed following receipt of feedback from the stakeholders.

**Table 1: Key issues and areas of focus raised during consultation**

Stakeholder	Issues and areas of focus	How addressed
Department of Planning and Environment (The Department's response was provided via phone)	Construction noise and vibration impacts and management measures	Included in IA scope
	Management of contaminated material	Included in IA scope
	Project boundaries and interface with public spaces and access	Included in IA scope
Office of Environment and Heritage	No response	-
Environment Protection Authority	No response	-
Transport for NSW	No response	-
City of Sydney	No response	-

### 2.1.2 Preparing audit activities

The Auditor performed a document review, prepared an audit plan, and prepared work documents (audit checklists) and distributed to the Project team in preparation for the IA.

The primary documents reviewed prior to the site visit are as follows:

- *Environmental Impact Statement for SSD 17\_8373 Alexandria Park Community School, Urbis, December 2017 (the EIS)*

- SSD 17\_8373 Alexandria Park Community School Response to Submissions, 3 October 2018 (the Consent)
- Development Consent SSD 8373, 11 February 2019
- *Aboriginal Cultural Heritage Management Plan Alexandria Park Community School 7-11 Park Road Alexandria NSW (City of Sydney LGA), Version 1, March 2019* (AbHMP)
- *Community Communication Strategy Alexandria Park Community School, April 2019* (CCS)
- *Alexandria Park Community School No. 1161 Construction Environmental Management Plan (CEMP) 14 March 2019*
- *Construction Traffic and Pedestrian Management Plan, Alexandria Park Community School K-12 13 Belmont Street, Alexandria, NSW, 2015 [no date or revision]* (CTPMSP)
- *Alexandria Park Community School Construction Noise Vibration Management Plan, Revision 0, Acoustic Logic, 8 March 2019* (CNVMSP)
- *Construction Soil and Water Management Plan, SCP Engineers and Development Consultants, 6 March 2019* (CSWMSP)
- *Construction Waste Management Sub-Plan (CWMSP), comprising:*
  - *DECC Construction Waste Management Plan, Alexandria Park Community School, Rev1;*
  - *DECC Asbestos Management Removal Plan, Alexandria Park Community School, Rev1;*
  - *Richard Crookes Constructions Hazardous Materials Management Plan Alexandria Park Community School Buckland Street, Alexandria NSW 2015, 3 April 2019*

Audit checklists were reviewed and prepared. These comprised:

- Schedule 2 of SSD 8373 CoCs
- Select environmental management and mitigation measures as set out in the Project's CEMP, Sub-plans and CCS.

### **2.1.3 Site personnel involvement**

The on-site audit activities took place on 4 June 2019. The following personnel took part in the audit:

- Nicholas Clay – Senior Project Manager (Savills Project Management)
- Trent Scrivener – Senior Project Engineer (RCC)
- Obadiah Williams – Site Engineer (RCC)
- John Healy – WHS Manager (RCC)
- John Peacock – Site Manager (RCC)
- Andrew Buchanan – Project Director (RCC) (opening meeting only)
- Derek Low – Auditor (WolfPeak).

## Meetings

Opening and closing meetings were held with the Auditor and Project personnel.

During the opening meeting the objectives and scope of the IA, the resources required and methodology to be applied were discussed. At the closing meeting, preliminary audit findings must be presented, recommendations (if appropriate) must be made, and any post-audit actions were confirmed.

## Interviews

The Auditor conducted interviews with key personnel involved in Project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development.

### 2.1.4 Site inspection

The on-site audit activities took place on 4 June 2019. The on-site audit activities included an inspection of the site and work activities. Photos are presented in Appendix F.

### 2.1.5 Document review

The IA included investigation and review of Project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The documents sighted are included with Appendices A and B.

### 2.1.6 Generating audit findings

IA findings were based on verifiable evidence. The evidence included:

- relevant records, documents and reports
- interviews of relevant site personnel
- photographs
- figures and plans; and
- site inspections of relevant locations, activities and processes.

## Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the IAPAR, being:

- **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.
- **Not triggered** – A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Observations and notes may also be made to provide context, identify opportunities for improvement or highlight positive initiatives .

#### **Evaluation of post approval documentation**

The Auditor assessed whether post approval documents:

- have been developed in accordance with the CoCs and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate; and
- have been implemented in accordance with the CoCs and all other environmental licences and approvals applicable to the Project (if any).

The adequacy of post approval documents were determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document; and
- whether there are any opportunities for improvement.

#### **2.1.7 Completing the audit**

The IA Report was distributed to the proponent to check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented.

### 3. Audit findings

#### 3.1 Approvals and documents audited and evidence sighted

The documents audited comprised all the conditions from Schedule 2 of SSD 8373 applicable to the works being undertaken, and selected mitigation measures and commitments from the following plans:

- AbHMP
- CCS
- CEMP
- CTPMSP
- CNVMSP
- CWMSP
- CSWMP.

The evidence sighted against each requirement is detailed within Appendices A and B.

#### 3.2 Compliance Status

This Section presents the findings of the June 2019 IA.

Section 4 presents a summary of the findings from this IA and actions proposed or undertaken in response to the findings. The Audit Checklists provided in Appendices A and B present details of all the evidence collected, observed and provided in support of a finding.

##### 3.2.1 Summary

There were 107 CoCs and 24 CEMP and Sub-plan mitigation measures assessed.

There were three non-compliances identified against six CoCs. There were no non-compliances identified against commitments within the CEMP and Sub-Plans.

##### 3.2.2 Details

###### Non-compliance against CoC B22 (and A12)

CoC B22 requires that the CTPMSP be prepared in consultation with Council and RMS.

CoC A12 requires that, where a condition requires consultation with an identified party, consultation be undertaken prior to submission of the document to which it relates and that details of the consultation be included in the submission of the document to which it relates.

Whilst the CTPMSP states that the document was prepared in consultation with the relevant stakeholders, there is no evidence to demonstrate that the CTPMSP was consulted on with RMS. The



Auditor notes that APCS has consulted with the RMS on routes for trucks transporting waste in accordance with CoC B29. These routes are the same as the routes nominated for construction in the CTPMSP.

#### **Non-compliance against CoC B23 (and A12)**

CoC B23 requires that the CNVMSP describe the community consultation undertaken to develop the strategies to manage high noise generating works.

CoC A12 requires that, where a condition requires consultation with an identified party, consultation be undertaken prior to submission of the document to which it relates and that details of the consultation be included in the submission of the document to which it relates.

The document states that consultation has occurred with affected receivers, but there is no detail provided as to how this consultation has assisted in the development of the management approach to high impacts, or evidence of the consultation having occurred.

The Auditor notes that, despite the observation in Section 3.6.1 and finding against this requirement, consultation with potentially affected receivers is regular and ongoing and the consultation includes the management of noise impacts.

#### **Non-compliance against CoC B25 (and A12)**

CoC B25 requires that the CSWMSP be prepared in consultation with Council and that it detail the management of stormwater during specified weather events including the 1:100 year ARI flood event.

CoC A12 requires that, where a condition requires consultation with an identified party, consultation be undertaken prior to submission of the document to which it relates and that details of the consultation be included in the submission of the document to which it relates.

At the time of the audit, there was no evidence that the document was prepared in consultation with Council. The consultation has since commenced, with a response from Council pending.

Whilst the CSWMSP was developed to address the 1:1 year ARI and 1:5 year ARI events, there is no information in the plan that details the measures to be implemented under the 1:100 year ARI event as required by the condition. In response to this finding feedback was provided from the author of the CSWMSP. The author identified that assessment of storm events was undertaken in accordance with the Managing Urban Stormwater series (i.e.: the Blue Books). These documents do not call up the need to assess 1:100 year ARI events and effective control measures are difficult to achieve due to the velocity and volume of floodwaters in such events. The Auditor agrees with this position.

### **3.2.3 Corrective action requests and observations**

There were three observations identified in relation to the CoC and the CNVMSP and CWMSP.

#### **Observation in relation to CoC A20**

CoC A20 requires that any monitoring or an environmental audit required by the CoC or plans comply with Division 9.4 of Part 9 of the EP&A Act. This section of the Act requires (among other things) the need to be accurate, true (not misleading), properly conducted (approved methodology, calibrated etc.) and have records retained.

RCC are carrying out voluntary on-site spot check noise monitoring from time to time (to compliment the formal noise monitoring events being undertaken by Acoustic Logic). This monitoring is not being conducted in accordance with the applicable Australian Standard and should not be relied upon for any formal purpose (such as to assess compliance or in response to a complaint).

#### **Observation in relation to the CNVMSP**

If the Project were to follow the CNVMSP without regard to the CoCs then there is risk of failing to comply with other requirements on the Project.

The complaints management system described in the CNVMSP does not refer to the complaints management processes and benchmarks as set out in the CCS.

The CNVMSP does not address the requirement set out in CoC C8, C17, C20. It is unclear how the Project would comply with these requirements if following the CNVMSP without regard to the CoCs.

Section 11 of the CNVMSP provides an overview of the management approach when noise or vibration levels are predicted to exceed the applicable criteria. There is no detail provided as to how the construction contractor would determine if the predicted impact for a given activity would comply with the criteria or not, and therefore makes it difficult to ensure compliance with CoC C15 and CoC C21. It is unclear when monitoring or modelling should be undertaken to inform these decisions. To note, the predictions included in Section 9 of the CNVMSP relate to large phases of works and do not describe whether the mitigation measures in Section 11 have been applied or not.

The CNVMSP commits to noise monitoring being carried out from time to time and does not specify any methodology. It would be beneficial to provide the construction team with greater guidance on when monitoring should be undertaken and how it should be undertaken (i.e.: Australian Standard 1055).

The CNVMSP does not detail whether the noise penalties specified in the Interim Construction Noise Guideline (DECC, 2009) have been applied to the Noise Management Levels for noise emissions with potentially annoying characteristics.

### **Observation in relation to CWMSP**

The Project has prepared three documents to address the requirements of the CWMSP. In combination the documents address the requirements of this condition. It is understood that the Hazardous Materials Management Plan is the overarching plan dealing with hazardous materials for the Project. The DECC waste and Asbestos Plan are specific for their works.

Given the DECC waste management plan covers demolition only, an updated CWMSP will need to be prepared for works outside of their scope (i.e.: post demolition) for materials other than those covered by the Hazardous Materials Management Plan.

### **3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents**

The adequacy of post approval documents must be determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document; and
- whether there are any opportunities for improvement.

A review was conducted of the

- AbHMP
- CCS
- CEMP
- CTPMSP
- CNVMSP
- CWMSP
- CSWMSP.

The documents are generally adequate, other than certain aspects of the CNVMSP and the scope of the CWMSP. Refer to the Auditors observations in Section 3.2.3 regarding the adequacy of these plans.

### **3.4 Project's EMS**

RCC operate an EMS for the Project. In carrying out the audit, it was evident that the elements of AS/NZ ISO 14001-2016 Environmental Management Systems are being implemented. Evidence to support this include the documents sighted during the audit (detailed in Appendices A and B) and controls observed in the field.

### **3.5 Summary of notices from agencies**

The Auditor is not aware of any notices served on the Project by agencies.

### **3.6 Other matters considered relevant by the auditor or DPE**

#### **3.6.1 Management of noise**

The Auditor notes that CoC C15 requires that the Project be constructed to achieve the Noise Management Levels (NMLs) 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 CNVMSP.

Despite the Project demonstrating that reasonable and feasible controls are being implemented, the Auditor recognises that purely as a result of the approved works, and the proximity to nearby receivers that exceedances of the NMLs are likely, as are complaints. Two noise complaints have been received to date. RCC should continue to formally monitor works and take opportunities for further noise mitigation should they arise. This may include increased consultation on upcoming works with the residents on the southern and western boundaries.

#### **3.6.2 Discharge of waters**

The Auditor notes that CoC C29 requires that any seepage or rainwater collected on-site during construction or groundwater must not be pumped to the street stormwater system unless separate prior approval is given in writing by the EPA in accordance with the *Protection of the Environment Operations Act 1997* (POEO Act).

The Project does not currently have the need to pump water off site. However this standard condition is problematic as the EPA is generally reluctant to licence non-scheduled activities unless otherwise justified by the applicant. This means that the Project must reuse all water captured on site or pay for it to be removed as liquid waste or tradewaste. The Auditor notes that Sydney Water are also typically reluctant to permit disposal of rainwater captured on construction sites to sewer due to potential risks associated with sediment loading.

Considering the supposed intention of this condition (to prevent the pollution of waters), the Auditor suggests the Project contact the Department to seek clarification as to whether discharges to stormwater without EPA approval are considered a contravention of the consent even if the discharges comply with S120 of the POEO Act (and do not result in the pollution of waters).

### **3.7 Complaints**

A complaints register is being maintained by the Project. The register is published monthly on the Project website at <https://www.schoolinfrastructure.nsw.gov.au/projects/a/alexandria-park-community-school.html>

At the time of writing, a total of four complaints were recorded since the commencement of works. These related to noise, vibration and pests. All four were considered by the Project to be closed.

### 3.8 Incidents

The Project has not identified any incidents as defined by the Consent.

### 3.9 Actual versus predicted impacts

The audit considered the actual impacts arising from the carrying out of the Project (current works being site establishment, survey and investigations, hazardous materials removal and demolition) and whether they are consistent with the relevant impacts predicted in the EIS. A summary of the assessment is presented in Table 2.

**Table 2: Summary of predicted versus actual impacts**

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
Physical extent of the development in comparison with the approved boundary and any potential off-site impacts	The approved Project boundary is defined within the stamped plans listed under CoC A2.	The Project footprint is the same as that approved.	Y
Biodiversity	The Project would result in the loss of 69 mature trees and protect those being retained	Tree removal had occurred in the approved locations. Trees to be retained were protected.	Y
Traffic and access	Minor and temporary disruptions to parking, traffic and access. No heavy vehicles to be parked beyond the Project boundaries.	All construction vehicles were confined to site. Heavy vehicle movements are minor and using approved routes.	Y
Noise and vibration	Moderate short term construction noise and vibration impacts on nearby receivers above the relevant Noise Management Levels.	Noise impacts are occurring but appear to be generally consistent with that predicted.	Y
Heritage	Further investigations are required as part of a full ACHA	Investigations were essentially complete during the audit, with reporting yet to be completed.	Y
Contaminated land	There is known and suspected contamination on the site needing to be managed under documents prepared in accordance with the CLM Act 1997 and WHS Act 2011.	Works to date (other than archaeological investigations) have involved removal of asbestos and related materials from building fabrics and equipment above the surface. The works appear to be carried out in accordance with the relevant codes of practice.	Y

#### 4. Actions

Item	Cond No	Type	Details of item	Proposed or completed action by the auditee	By whom and by when	Status
<b>JUNE 2019 AUDIT FINDINGS</b>						
<b>Conditions of Consent SSD 8373 Schedule 2</b>						
1	CoC A20	Observation	<p>CoC A20 requires that any monitoring or an environmental audit be in compliance with Division 9.4 of Part 9 of the EP&amp;A Act. This section of the Act requires (among other things) the need to be accurate, true (not misleading), properly conducted (approved methodology, calibrated etc) and have records retained.</p> <p>RCC are carrying out voluntary on-site spot check noise monitoring from time to time (to compliment the formal noise monitoring events being undertaken by Acoustic Logic). This monitoring is not being conducted in accordance with the applicable Australian Standard and should not be relied upon for any formal purpose (such as to assess compliance of in response to a complaint).</p>	NA	NA	CLOSED
2	CoC B22 (and A12)	Non-compliance	<p>CoC B22 requires that a Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) be prepared in consultation with Council and RMS.</p> <p>CoC A12 requires that, where a condition requires consultation with an identified party, consultation be undertaken prior to submission of the document to which it relates and that details of the consultation be included in the submission of the document to which it relates.</p> <p>Whilst the CTPMSP states that the document was prepared in consultation with the relevant stakeholders, there is no evidence to demonstrate that the CTPMSP was consulted on with RMS. The Auditor notes that APCS has consulted with the RMS on routes for trucks transporting waste in accordance with CoC B29. These routes are the same as the routes nominated for construction in the CTPMSP.</p>	Consultation is to be undertaken with RMS on the CTPMSP.	<p>SINSW</p> <p>Prior to the next audit.</p>	OPEN

3	CoC B23 (and A12)	Non-compliance	<p>CoC B23 requires that a Construction Noise and Vibration Management Sub-Plan (CNVMSP) describe the community consultation undertaken to develop the strategies to manage high noise generating works.</p> <p>CoC A12 requires that, where a condition requires consultation with an identified party, consultation be undertaken prior to submission of the document to which it relates and that details of the consultation be included in the submission of the document to which it relates.</p> <p>).</p> <p>The document states that consultation has occurred with affected receivers, but there is no detail provided as to how this consultation has assisted in the development of the management strategies for high noise impacts, or evidence of the consultation having occurred.</p> <p>The Auditor notes that, despite the observation in Section 3.6.1, consultation with potentially affected receivers is regular and ongoing and the consultation includes management of high noise.</p>	NA	NA	CLOSED
4	CoC B23	Observation	<p>If the Project were to follow the CNVMSP without regard to the CoCs then there is risk of failing to comply with other requirements on the Project.</p> <p>The complaints management system described in the CNVMSP does not refer to the complaints management processes and benchmarks as set out in the Community Communications Strategy.</p> <p>The CNVMSP does not address the requirement set out in CoC C8, C17, C20. It is unclear how the Project would comply with these requirements if following the CNVMSP without regard to the CoCs.</p> <p>Section 11 of the CNVMSP provides an overview of the management approach when noise or vibration levels are predicted to exceed the applicable criteria. There is no detail provided as to how the construction contractor would determine if the predicted impact for a given activity would comply with the criteria or not, and therefore makes it difficult to ensure compliance with CoC C15 and CoC C21. It is unclear when monitoring or modelling should be undertaken to inform these decisions. To note, the predictions included in Section 9 of the CNVMSP relate to large phases of works and do not describe whether the mitigation measures in Section 11 have been applied or not.</p> <p>The CNVMSP commits to noise monitoring being carried out from time to time and does not specify any methodology. It would be beneficial to</p>	The CNVMSP will be reviewed and updated as required	SINSW 24/07/2019	OPEN

			<p>provide the construction team with greater guidance on when monitoring should be undertaken and how it should be undertaken (i.e.: Australian Standard 1055).</p> <p>The CNVMSP does not detail whether the noise penalties specified in the ICNG have been applied to the Noise Management Levels for potentially annoying noise characteristics.</p>			
5	CoC B24	Observation	<p>The Project has prepared three documents to address the requirements of the Construction Waste Management Sub-Plan (CWMSP). In combination the documents address the requirements of this condition. It is understood that the Hazardous Materials Management Plan is the overarching plan dealing with hazardous materials for the Project. The DECC waste and Asbestos Plan are specific for their works.</p> <p>Given the DECC waste management plan covers demolition only, an updated CWMSP will need to be prepared for works outside of their scope (i.e.: post demolition).</p>	NA	NA	CLOSED
6	CoC B25 (and A12)	Non-compliance	<p>CoC B25 requires that a Construction Soil and Water Management Plan (CSWMSP) be prepared in consultation with Council. It requires that the plan detail the management of stormwater during the specified weather events including 1:100 year ARI.</p> <p>CoC A12 requires that, where a condition requires consultation with an identified party, consultation be undertaken prior to submission of the document to which it relates and that details of the consultation be included in the submission of the document to which it relates.</p> <p>At the time of the audit, there was no evidence that the document was prepared in consultation with Council. The consultation has since commenced, with a response from Council pending.</p> <p>Whilst the CSWMSP was developed to address the 1:1 year ARI and 1:5 year ARI events, there is no information in the plan that details the measures to be implemented under the 1:100 year ARI event as required by the condition. In response to this finding feedback was provided from the author of the CSWMSP. The author identified that assessment of storm events was undertaken in accordance with the Managing Urban Stormwater series (i.e.: the Blue Books). These documents do not call up</p>	NA	NA	CLOSED



			the need to assess 1:100 year ARI events and effective control measures are difficult to achieve due to the velocity and volume of floodwaters in such events. The Auditor agrees with this position.			
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## 5. Conclusions

The overall outcome of the IA was positive. Compliance records were very well organised and available at the time of the site inspection and interview with Savills and RCC personnel on 4 June 2019. Relevant environmental and compliance monitoring records are being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements.

There were 107 CoCs and 24 CEMP and Sub-plan mitigation measures assessed. There were three non-compliances identified against the CoC. The non-compliances related to omissions of required information within Project documentation, predominantly in relation to consultation with identified stakeholders.

There were no non-compliances identified against the assessed mitigation measures within the CEMP and Sub-Plans.

There were three observations identified in relation to the CoC, the CNVMSP and the CWMSP. These related to noise monitoring being conducted on site and the adequacy of the Sub-Plans.

Detailed findings are presented in Section 3. Actions proposed by the Project team to address the findings of this IA are set out in Section 4.

The overall outcome of the IA was indicative of a good degree of compliance and environmental performance by Savills and RCC. The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the IA.

## 6. Limitations

This Document has been provided by WolfPeak Pty Ltd (WolfPeak) to the Client and is subject to the following limitations:

This Document has been prepared for the particular purpose/s outlined in the WolfPeak proposal/contract/relevant terms of engagement, or as otherwise agreed, between WolfPeak and the Client.

In preparing this Document, WolfPeak has relied upon data, surveys, analyses, designs, plans and other information provided by the Client and other individuals and organisations (the information). Except as otherwise stated in the Document, WolfPeak has not verified the accuracy or completeness of the information. To the extent that the statements, opinions, facts, findings, conclusions and/or recommendations in this Document (conclusions) are based in whole or part on the information, those conclusions are contingent upon the accuracy and completeness of the information. WolfPeak will not be liable in relation to incorrect conclusions should any information be incomplete, incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to WolfPeak.

This Document has been prepared for the exclusive benefit of the Client and no other party. WolfPeak bears no responsibility for the use of this Document, in whole or in part, in other contexts or for any other purpose. WolfPeak bears no responsibility and will not be liable to any other person or organisation for or in relation to any matter dealt with in this Document, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in this Document (including without limitation matters arising from any negligent act or omission of WolfPeak or for any loss or damage suffered by any other party relying upon the matters dealt with or conclusions expressed in this Document). Other parties should not rely upon this Document or the accuracy or completeness of any conclusions and should make their own inquiries and obtain independent advice in relation to such matters.

To the best of WolfPeak's knowledge, the facts and matters described in this Document reasonably represent the Client's intentions at the time of which WolfPeak issued the Document to the Client. However, the passage of time, the manifestation of latent conditions or the impact of future events (including a change in applicable law) may have resulted in a variation of the Document and its possible impact. WolfPeak will not be liable to update or revise the Document to take into account any events or emergent circumstances or facts occurring or becoming apparent after the date of issue of the Document.

## Appendix A. SSD 8373 Conditions of Consent

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Schedule 2</b>				
<b>Part A Administrative conditions</b>				
<b>Obligation to Minimise Harm to the Environment</b>				
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.	Evidence referred to elsewhere in this Audit Table	The proponent has demonstrated that reasonable and feasible measures are being implemented to prevent or minimise harm to the environment.	Compliant
<b>Terms of Consent</b>				
A2	The development may only be carried out: <ul style="list-style-type: none"> <li>a) in compliance with the conditions of this consent;</li> <li>b) in accordance with all written directions of the Planning Secretary;</li> <li>c) generally in accordance with the EIS and Response to Submissions;</li> <li>d) in accordance with the approved plans in the table below:</li> </ul>	Approved plans stamped 11/02/2019 available on site.	These drawings are the plans being used for the development.	Compliant

Unique ID	Compliance requirement				Evidence collected	Independent Audit findings and recommendations	Compliance Status
	Architectural Drawings prepared by Tanner Kibble Denton Architects						
	Dwg No.	Rev.	Name of Plan	Date			
	AR.DA. 1001	P1	Existing Site Plan	08.12.17			
	AR.DA. 1101	P2	Proposed Site Plan	20.04.18			
	AR.DA. 1201	P2	Existing and Proposed Site Plans	20.04.18			
	AR.DA. 1202	P2	Phase 1 – Construction Extent	20.04.18			
	AR.DA. 1203	P2	Phase 2 – Construction Extent	20.04.18			
	AR.DA. 2001	P5	Campus Plans – Ground and First Floors	28.11.18			
	AR.DA. 2002	P4	Campus Plans – Second and Third Floors	24.04.18			
	AR.DA. 2003	P4	Campus Plans – Fourth Floor and Roof	29.11.18			
	AR.DA. 2010	P2	Key Plan	20.04.18			
	AR.DA. 2011	P2	Key Plan – Building References	20.04.18			
	AR.DA. 2101	P3	Ground Floor Plan – Northern Hubs	20.04.18			
	AR.DA. 2102	P3	Ground Floor Plan – Southern Hubs	20.04.18			
	AR.DA. 2201	P3	First Floor Plan – Northern Hubs	20.04.18			
	AR.DA. 2202	P4	First Floor Plan – Southern Hubs	24.04.18			
	AR.DA. 2301	P3	Second Floor Plan – Northern Hubs	20.04.18			
	AR.DA. 2302	P4	Second Floor Plan – Southern Hubs	24.04.18			
	AR.DA. 2401	P3	Third Floor Plan – Northern Hubs	20.04.18			
	AR.DA. 2402	P3	Third Floor Plan – Southern Hubs	20.04.18			
	AR.DA. 2501	P3	Fourth Floor Plan – Northern Hubs	20.04.18			
	AR.DA. 2601	P2	Roof Plan – Northern Hubs	20.04.18			
	AR.DA. 2602	P2	Roof Plan – Southern Hubs	20.04.18			
	AR.DA. 3001	P2	Elevations 1	20.04.18			
	AR.DA. 3002	P1	Detailed Elevations 1	08.12.17			
	AR.DA. 3003	P2	Detailed Elevations 2	20.04.18			
	AR.DA. 3004	P2	Detailed Elevations 3	20.04.18			
	AR.DA. 3005	P2	Detailed Elevations 3 – Screen	20.04.18			
	AR.DA. 3101	P2	Sections 1	20.04.18			
	AR.DA. 3111	P2	Detailed Section Sheet 1	20.04.18			

Unique ID	Compliance requirement				Evidence collected	Independent Audit findings and recommendations	Compliance Status																																																																																																																
	<table><tr><td>AR DA 4001</td><td>P1</td><td>External Material Finishes</td><td>08.12.17</td></tr><tr><td colspan="4">Landscape Drawings prepared by Context Landscape Design Pty Ltd</td></tr><tr><td>Dwg No.</td><td>Rev.</td><td>Name of Plan</td><td>Date</td></tr><tr><td>L-SD-101-00</td><td>P8</td><td>Overall Landscape Plan Ground Floor</td><td>03.12.18</td></tr><tr><td>L-SD-200-00</td><td>P6</td><td>Landscape Detail Plan – Entry Plaza</td><td>03.12.18</td></tr><tr><td>L-SD-201-00</td><td>P4</td><td>Landscape Section – Entry Plaza</td><td>30.11.17</td></tr><tr><td>L-SD-210-00</td><td>P5</td><td>Landscape Detail Plan – Learning Lawn</td><td>23.04.18</td></tr><tr><td>L-SD-211-00</td><td>P4</td><td>Landscape Section – Learning Lawn</td><td>30.11.17</td></tr><tr><td>L-SD-220-00</td><td>P5</td><td>Landscape Detail Plan – Canopy Classroom East</td><td>19.04.18</td></tr><tr><td>L-SD-221-00</td><td>P4</td><td>Landscape Section – Canopy Classroom East</td><td>30.11.17</td></tr><tr><td>L-SD-230-00</td><td>P5</td><td>Landscape Detail Plan – Canopy Classroom West</td><td>19.04.18</td></tr><tr><td>L-SD-231-00</td><td>P4</td><td>Landscape Section – Canopy Classroom West</td><td>30.11.17</td></tr><tr><td>L-SD-250-00</td><td>P4</td><td>Landscape Detail Plan – Northern Roof</td><td>30.11.17</td></tr><tr><td>L-SD-251-00</td><td>P4</td><td>Landscape Detail Plan – Southern Roof</td><td>30.11.17</td></tr><tr><td>L-SD-260-00</td><td>P7</td><td>Fencing Strategy Plan</td><td>23.04.18</td></tr><tr><td>L-SD-261-00</td><td>P7</td><td>Fencing Strategy Plan School Hours</td><td>23.04.18</td></tr><tr><td>L-SD-262-00</td><td>P7</td><td>Fencing Strategy Plan After Hours + Weekends</td><td>23.04.18</td></tr><tr><td>L-SD-263</td><td>P5</td><td>Fencing Strategy Sports Fence (Park Rd Interface) Elevation</td><td>09.03.18</td></tr><tr><td>L-SD-301-00</td><td>P6</td><td>Existing Tree Plan and Schedule Sheet 1 of 2</td><td>03.12.18</td></tr><tr><td>L-SD-302-00</td><td>P6</td><td>Existing Tree Plan and Schedule Sheet 2 of 2</td><td>03.12.18</td></tr><tr><td>L-SD-303-00</td><td>P6</td><td>Proposed Trees</td><td>03.12.18</td></tr><tr><td>L-SD-304-00</td><td>P3</td><td>Indicative Planting Palette</td><td>30.11.17</td></tr><tr><td colspan="4">Stormwater/Drainage Drawings prepared by Woolacotts Consulting Engineers</td></tr><tr><td>Dwg No.</td><td>Rev.</td><td>Name of Plan</td><td>Date</td></tr><tr><td>SW1</td><td>A</td><td>Stormwater Management Plan – Sheet 1</td><td>14.09.17</td></tr><tr><td>SW2</td><td>A</td><td>Stormwater Management Plan – Sheet 1</td><td>14.09.17</td></tr><tr><td>ES1</td><td>A</td><td>Erosion and Sediment Control Plan</td><td>14.09.17</td></tr><tr><td>ES2</td><td>A</td><td>Erosion and Sediment Control Plan</td><td>14.09.17</td></tr></table>				AR DA 4001	P1	External Material Finishes	08.12.17	Landscape Drawings prepared by Context Landscape Design Pty Ltd				Dwg No.	Rev.	Name of Plan	Date	L-SD-101-00	P8	Overall Landscape Plan Ground Floor	03.12.18	L-SD-200-00	P6	Landscape Detail Plan – Entry Plaza	03.12.18	L-SD-201-00	P4	Landscape Section – Entry Plaza	30.11.17	L-SD-210-00	P5	Landscape Detail Plan – Learning Lawn	23.04.18	L-SD-211-00	P4	Landscape Section – Learning Lawn	30.11.17	L-SD-220-00	P5	Landscape Detail Plan – Canopy Classroom East	19.04.18	L-SD-221-00	P4	Landscape Section – Canopy Classroom East	30.11.17	L-SD-230-00	P5	Landscape Detail Plan – Canopy Classroom West	19.04.18	L-SD-231-00	P4	Landscape Section – Canopy Classroom West	30.11.17	L-SD-250-00	P4	Landscape Detail Plan – Northern Roof	30.11.17	L-SD-251-00	P4	Landscape Detail Plan – Southern Roof	30.11.17	L-SD-260-00	P7	Fencing Strategy Plan	23.04.18	L-SD-261-00	P7	Fencing Strategy Plan School Hours	23.04.18	L-SD-262-00	P7	Fencing Strategy Plan After Hours + Weekends	23.04.18	L-SD-263	P5	Fencing Strategy Sports Fence (Park Rd Interface) Elevation	09.03.18	L-SD-301-00	P6	Existing Tree Plan and Schedule Sheet 1 of 2	03.12.18	L-SD-302-00	P6	Existing Tree Plan and Schedule Sheet 2 of 2	03.12.18	L-SD-303-00	P6	Proposed Trees	03.12.18	L-SD-304-00	P3	Indicative Planting Palette	30.11.17	Stormwater/Drainage Drawings prepared by Woolacotts Consulting Engineers				Dwg No.	Rev.	Name of Plan	Date	SW1	A	Stormwater Management Plan – Sheet 1	14.09.17	SW2	A	Stormwater Management Plan – Sheet 1	14.09.17	ES1	A	Erosion and Sediment Control Plan	14.09.17	ES2	A	Erosion and Sediment Control Plan	14.09.17			
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A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: 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; and b) the implementation of any actions or measures contained in any such document referred to in (a) above.				Interview with auditees	No directions have been made by the Planning Secretary	Not triggered																																																																																																																
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) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict				-	Noted	Not triggered																																																																																																																
Design Amendments																																																																																																																							

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A5	To ensure that adverse privacy impacts are not generated, the southern and western elevations of the upper levels of the development, being levels three, four and five, are to be fitted with privacy screens and/or louvres to restrict direct overlooking into adjoining residential flat building developments. Details must be provided to the satisfaction of the Certifying Authority prior to the commencement of construction.	Refer to response to CoC A13	Refer to response to CoC A13	Not triggered.
A6	All approved Architectural Drawings must be updated to reflect the amended location of the rooftop shade structure from the western edge to the inner eastern edge of the Southern Hub rooftop play area as shown on the approved Drawing No. AR.DA. 2003, Revision P4 Campus Plans- Fourth Floor and Roof, dated 29 November 2018. Details must be provided to the satisfaction of the Certifying Authority prior to the commencement of construction	Refer to response to CoC A13	Refer to response to CoC A13	Not triggered
<b>Limits of Consent</b>				
A7	This consent lapses five years after the date of consent unless the works associated with the development have physically commenced.	Notification for commencement of works, DoE to DPE dated 8/4/19	Works commenced 10/04/19	Compliant
<b>Prescribed Conditions</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A8	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation	CC1 granted 24/4/19. Signage sighted 04/06/19.	Part 6, Division 8A of the EPAA relates to prescribed conditions for: <ul style="list-style-type: none"> <li>- compliance with the BCA</li> <li>- erection of signs</li> <li>- residential building work (not relevant)</li> <li>- entertainment venues (not relevant to demolition)</li> <li>- signage for max number of persons (not relevant for demolition)</li> <li>- shoring and adjoining properties (not relevant to this project)</li> </ul> The issue of Construction Certificate by Certifying Authority demonstrates compliance with the BCA to the extent of works that it covers. Signage observed complied with the requirements.	Compliant
<b>Planning Secretary as Moderator</b>				
A9	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	Interview with auditees	No disputes identified	Not triggered
<b>Long Service Levy</b>				
A10	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	28/3/19 NSW Long Service Corp Levy Receipt.	Payment made.	Compliant
<b>Legal Notices</b>				
A11	Any advice or notice to the consent authority must be served on the Planning Secretary.	Interview with auditees	No notices being served were identified	Not triggered
<b>Evidence of Consultation</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A12	Where conditions of this consent require consultation with an identified party, the Applicant must: <ul style="list-style-type: none"> <li>a) consult with the relevant party prior to submitting the subject document for information or approval; and</li> <li>b) provide details of the consultation undertaken including: <ul style="list-style-type: none"> <li>i. the outcome of that consultation, matters resolved and unresolved; and</li> <li>ii. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</li> </ul> </li> </ul>	4/4/19 DPE to SINSW Approval of Community Consultation Strategy.  2/4/19 Dept Ed Community Consultation Strategy.  Documents referred to elsewhere in this Audit Table that require consultation.	<b>Non-compliance: There is no evidence that demonstrates the consultation was carried out in the preparation of the Construction Traffic and Pedestrian Management Sub Plan (CoC B22) with RMS, the Construction Noise and Vibration Management Sub Plan (CoC B23) with affected receivers, or the Construction Soil and Water Management Sub Plan (CoC B25) with Council.</b>	Non-compliant
<b>Staging, Combining and Updating Strategies, Plans or Programs</b>				
A13	With the approval of the Planning Secretary, the Applicant may: <ul style="list-style-type: none"> <li>a) prepare and submit any strategy, 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 or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</li> <li>b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</li> <li>c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and 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).</li> </ul>	18/4/2019 NSW Dept Ed Request to Stage Submission of Plans under Condition A13 (a). Attachment 2 -Staging of Plans.  18/4/19 DPE Approval of Request to Stage Preparation & Submission of plans.	Approval given by DPE to stage preparation and submission of plans as required under CoC A5, A6, B2, B3, B17 to B19, B27, B28, B30 to B34, B38 and B39.  Phase 1, Stage 1  CC1 Demolition of main structures, grounds slabs, piles and in-ground services.  The project is to make a further submission re Phase 1, Stage 2.  Stage 2 CC2, CC3 & CC4 – Civil & Contamination Works, Main Works and External Works.  Approval displayed on project website [see CoC A21].	Compliant
A14	If the Planning Secretary agrees, a strategy, 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.	Refer to response to CoC A13	Refer to response to CoC A13	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A15	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program	Nil to date.		Not Triggered.
<b>Demolition</b>				
A16	Demolition work must comply with Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 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 Certifying Authority before the commencement of works	<p>23/4/19 Certification of Methodology for Full Building Demolition of Buildings A, B and C. Tall Consulting Structural Engineers.</p> <p>4/4/19 Email BM+G, Crown Certificate List Requirements for Demolition</p> <p>1/4/19 Demolition Environmental Civil Contractors, Demolition Control Plan.</p> <p>8/4/19 SafeWork NSW Asbestos &amp; Demolition Checklist, Ivan Lim.</p>	Methodology checking has been done in accordance with AS2601 and Safe Work NSW code of practice – demolition work – 2016.	Compliant
<b>Structural Adequacy</b>				
A17	<p>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.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>• Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</li> <li>• Under section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of Subsidence Advisory NSW's approval before carrying out certain development in a Mine Subsidence District</li> </ul>	<p>Information submitted to Certifying Authority for granting of CC1.</p> <p>CC1 granted 29/04/19</p>	The issue of Construction Certificate by Certifying Authority demonstrates compliance with the BCA to the extent of works that it covers.	Compliant
<b>External Walls and Cladding</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A18	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA	Information submitted to Certifying Authority for granting of CC1.  CC1 granted 29/04/19	External wall specifications do not form part of the works occurring in this audit period. They will be assessed through a future Construction Certificate.	Not triggered
<b>Applicability of Guidelines</b>				
A19	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. However, 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.	The CEMP and sub-plans referred to elsewhere in this Audit Table	The CEMP and sub-plans refer to the relevant guidelines and policies.	Compliant
<b>Monitoring and Environmental Audits</b>				
A20	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, noncompliance notification, compliance reporting and independent auditing.  <i>Note: For the purposes of this condition, as set out in the EP&amp;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>	Part 9, Div 9.4 of the EPAA  Asbestos and SMF air monitoring results 17/4/19 – 03/06/19.  Noise monitoring report May 2019  Vibration monitoring results: 01/05/19 – 23/05/19	The relevant section of the EPAA relates to (among other things) the need to be accurate, true (not misleading), properly conducted (approved methodology, calibrated etc) and with records retained.  The monitoring results referred to appear to be carried out properly.  <b>Observation: RCC are carrying out on-site spot check noise monitoring from time to time (to compliment the formal noise monitoring events). This monitoring is not being conducted in accordance with the applicable Australian Standard and should not be relied upon for any formal purpose.</b>	Compliant
<b>Access to Information</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A21	<p>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:</p> <p>a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <ul style="list-style-type: none"> <li>i. the documents referred to in condition A2 of this consent;</li> <li>ii. all current statutory approvals for the development;</li> <li>iii. all approved strategies, plans and programs required under the conditions of this consent;</li> <li>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;</li> <li>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;</li> <li>vi. a summary of the current stage and progress of the development;</li> <li>vii. contact details to enquire about the development or to make a complaint;</li> <li>viii. a complaints register, updated monthly;</li> <li>ix. audit reports prepared as part of any independent environmental audit of the development and the Applicant's response to the recommendations in any audit report;</li> <li>x. any other matter required by the Planning Secretary; and</li> </ul> <p>b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>	<p>Project website;  <a href="https://www.schoolinfrastructure.nsw.gov.au/projects/a/al-exandria-park-community-school.html">https://www.schoolinfrastructure.nsw.gov.au/projects/a/al-exandria-park-community-school.html</a></p>	<p>a) (i), (ii), (iii) Required planning approval documentation, management plans and strategies found on website. (iv) and (v) the management plans do not specify reporting arrangements to be published, the conditions do not require monitoring to be undertaken. (vi) Current staging information and project updates [April 2019] provided on website. (vii) Contact details provided for feedback, questions and comments [schoolinfrastructure@det.nsw.edu.au]. (viii) Latest Complaints register [April 2019] found on website. (ix) This Audit Table is part of the first Audit Report. (x) it is understood that no directions have been received from the planning Secretary.</p> <p>The website appears be maintained with up to date information.</p>	Compliant
Compliance				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A22	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	8/4/19 Transmittal Admin Drawings for Information.  APCS Site Induction  Sample Site Induction Record.  16/4/19 Example Toolbox Meeting Minutes.  October 2018 APCS Early Works, Demolition & Associated Works [Design & Construct].	The material presented communicates a number of requirements relevant to the Project, in particular the Trade Conditions of Subcontract, which is quite comprehensive. The contract requirement align with the consent. A copy of the consent is also provided.  The Induction includes information relevant to the tasks being undertaken by the people undertaking construction works. 130 x people have been inducted to date.	Compliant
<b>ADVISORY NOTES</b>				
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.	-	Noted	Not triggered
<b>PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION</b>				
<b>Notification of Commencement</b>				
B1	The Department must be notified in writing of the dates of commencement of physical work and operation at least 48 hours before those dates. If the construction or operation of the development is to be staged, the Department 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.	8/4/19 Dept Education. APCS & SSD8373: Notification of Commencement in accordance with Condition B1 to DPE.	Notification was provided more than 48 hours prior to commencement of construction. The nominated date of commencement is 10/4/19.	Compliant
<b>Certified Drawings</b>				
B2	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: a) the relevant clauses of the BCA; and b) this development consent.	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>External Walls and Cladding</b>				
B3	<p>Prior to the commencement of construction, the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.</p> <p>The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it.</p>	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Protection of Public Infrastructure</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B4	<p>Before the commencement of construction, the Applicant must:</p> <ul style="list-style-type: none"> <li>a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;</li> <li>b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</li> <li>c) submit a copy of the dilapidation report to the Certifying Authority and Council.</li> </ul>	<p>Consultation Records March 19 with AusGrid, City of Sydney, Jemena, NBN Co, PIPE Networks, RMS, Sydney Water, Telstra NSW, TransGrid &amp; Verizon Business.</p> <p>24/9/18 Consultation with Sydney Water</p> <p>5/4/19 Email BM+G, Crown Certificate List Requirements for Demolition</p> <p>24/9/18 Sydney Water Approval for Building over/adjacent to Sydney Water Asset.</p> <p>Submission of documents to Sydney Water</p> <p>Dilapidations reports for school perimeter, Belmont Street, Buckland Street, Park Road and Amenities, Power Ave</p> <p>4/4/19 APCS Dilapidation Reports cover letter to City of Sydney.</p> <p>4/4/19 APCS Crown Certificate List of Requirements for Demolition to BM+G, Cover Letter.</p> <p>CC1 granted 24/4/19.</p>	<p>Evidence provided of consultations with relevant service providers/owners.</p> <p>Dilapidation reports completed and submitted to Certifying Authority and Council.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Aboriginal Cultural Heritage</b>				
B5	Prior to the commencement of any works involving ground disturbance, the Applicant must engage a suitably qualified heritage consultant to prepare a Heritage Management Plan addressing the HMP requirements in the report titled Aboriginal Cultural Heritage Assessment: Alexandria Park Community School, prepared by Extent Heritage Pty Ltd and dated 7 November 2018 have been complied with in full. A copy of the HMP must be submitted to the satisfaction of the Certifying Authority.	<p>5/4/19 Email BM+G, Crown Certificate List Requirements for Demolition</p> <p>April 19 Heritage Management Plan, Heritage 21</p> <p>Aboriginal Cultural Heritage Management Plan, Version 1 March 2019 and Version 3 May 2019, AMAC &amp; Streat Archaeological Services.</p> <p>Dec 18 Arboricultural Impact Assessment &amp; Tree Management Plan &amp; Tree Protection Plan.</p> <p>CC1 granted 24/4/19.</p>	<p>Heritage Management Plans were prepared by as part of application for CC1 which was granted 24/4/19 and updated in May 2019.</p> <p>The Aboriginal Cultural Heritage Management Plan addresses matters detailed in the Extent Aboriginal Cultural Heritage Assessment including further investigations (excavation and salvage if required), consultation, unexpected finds, reporting.</p>	Compliant
<b>Flooding</b>				
B6	Prior to the commencement of any works (excluding demolition and remediation works), details must be submitted to the satisfaction of the Certifying Authority that demonstrated the finished floor levels of the approved development are 0.5m above the 1% AEP flood event level.	Works undertaken to date - observed 04/06/19	Only demolition works have occurred to date.	Not triggered
<b>Site Contamination</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B7	Following the completion of demolition works but prior to the commencement of building works or vegetation clearing, additional site investigation for contaminants across previously untested areas of the site must be undertaken in accordance with: <ul style="list-style-type: none"> <li>a) NSW EPA Sampling Design Guidelines;</li> <li>b) Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017;</li> <li>c) <a href="https://www.epa.nsw.gov.au/publications/contaminatedland/17p0269-guidelines-forthensw-site-auditor-scheme-third-edition">https://www.epa.nsw.gov.au/publications/contaminatedland/17p0269-guidelines-forthensw-site-auditor-scheme-third-edition</a></li> <li>d) Guidelines for Consultants Reporting on Contaminated Sites, 2011 <a href="http://www.epa.nsw.gov.au/resources/clm/20110650consultantsqlines.pdf">www.epa.nsw.gov.au/resources/clm/20110650consultantsqlines.pdf</a></li> <li>e) The National Environment Protection (assessment of contamination) Measures 2013 as amended Testing must include assessment of both the soil and groundwater profile</li> </ul>	Works undertaken to date - observed 04/06/19	Only demolition works have occurred to date.	Not triggered
B8	The Remediation Action Plan, titled Alexandria Park Community School Remediation Action Plan, prepared by Coffey, dated 8 December 2017, must be updated to reflect the findings of the additional site investigations required by condition B7. The updated Remediation Action Plan must be approved by a NSW EPA Accredited Site Auditor and submitted to the Planning Secretary prior to commencement of remediation works.	Works undertaken to date - observed 04/06/19	Only demolition works have occurred to date.	Not triggered
B9	Prior to the commencement of remediation works, an asbestos works management plan must be prepared and submitted for review by a NSW EPA accredited Site Auditor. The asbestos works management plan must be implemented following the receipt of confirmation from the NSW EPA accredited Site Auditor that the asbestos works management plan is considered appropriate.	Works undertaken to date - observed 04/06/19	Only demolition works have occurred to date.	Not triggered
B10	Remediation works approved as part of this development consent must be carried out in accordance with the report titled, as required to be updated by condition B8, Alexandria Park Community School Remediation Action Plan, prepared by Coffey, dated 8 December 2017 (as amended as required by Condition B8).	Works undertaken to date - observed 04/06/19	Only demolition works have occurred to date.	Not triggered
B11	Upon completion of remedial works, the Applicant must submit a Site Audit Report and Section A Site Audit Statement for the relevant part of the site prepared by a NSW EPA accredited Site Auditor. The Site Audit Report and Section A Site Audit Statement must verify the relevant part of the site is suitable for the educational land use and be provided to the satisfaction of the Certifying Authority.	Works undertaken to date - observed 04/06/19	Only demolition works have occurred to date.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B12	<p>Upon completion of remedial works and prior to the commencement of construction (excluding demolition), a Long Term Environmental Management Plan (LTEMP) must be prepared and submitted to a NSW EPA accredited Site Auditor for review. The LTEMP must:</p> <ul style="list-style-type: none"> <li>a) identify the location and requirements for ongoing management of asbestos impacted soil and other contaminated soil contained on the site;</li> <li>b) detail the expected limitations on the site land use;</li> <li>c) identify relevant environmental, and health and safety processes and procedures;</li> <li>d) identify management processes, procedures and responsibilities to be adopted by future site users within the site;</li> <li>e) detail the location and extent of placed or residual asbestos impacted soil and other contaminated fill materials, capping layers and marker barriers within the site.</li> </ul>	Works undertaken to date - observed 04/06/19	Only demolition works have occurred to date.	Not triggered
<b>Unexpected Contamination Procedure</b>				
B13	<p>Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition B20 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.</p>	Works undertaken to date - observed 04/06/19	Only demolition works have occurred to date.	Not triggered
<b>Utilities and Services</b>				
B14	<p>Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.</p>	<p>Works undertaken to date - observed 04/06/19</p> <p>DBYD applications and files provided from Ausgrid, Telstra, Verizon, Sydney Water, Jemena</p>	Only demolition works have occurred to date. No utility works have commenced. Information to support applications for utility adjustments (if required) have commenced being collated.	Not triggered
B15	<p>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.</p>	<p>Works undertaken to date - observed 04/06/19</p> <p>DBYD applications and files provided from Ausgrid, Telstra, Verizon, Sydney Water, Jemena</p>	Only demolition works have occurred to date. No utility works have commenced. Information to support applications for utility adjustments (if required) have commenced being collated.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Community Communication Strategy</b>				
B16	<p>A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication between the Applicant, 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.</p> <p>The Community Communication Strategy must:</p> <ul style="list-style-type: none"> <li>a) identify people to be consulted during the design and construction phases;</li> <li>b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development;</li> <li>c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development;</li> <li>d) set out procedures and mechanisms: <ul style="list-style-type: none"> <li>i. through which the community can discuss or provide feedback to the Applicant;</li> <li>ii. through which the Applicant will respond to enquiries or feedback from the community; and</li> <li>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.</li> </ul> </li> </ul> <p>The Community Communication Strategy must be submitted to the Planning Secretary for approval no later than two weeks before the commencement of any work.</p> <p>Work for the purposes of the development must not commence until the Community Communication Strategy has been approved by the Planning Secretary, or within another timeframe agreed with the Planning Secretary</p>	<p>4/4/19 DPE to SINSW Approval of CCS.</p> <p>2/4/19 APCS CCS, Dept Ed.</p>	<p>CCS was prepared and approved by DPE prior to commencement of works. DPE note that it contains the information as required by the conditions of consent.</p>	Compliant
<b>Ecologically Sustainable Development</b>				
B17	<p>Prior to the commencement of construction, the Applicant must register for a minimum 4 star Green Star rating with the Green Building Council Australia, unless otherwise agreed by the Planning Secretary and submit evidence of registration to the Certifying Authority.</p>	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Outdoor Lighting</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B18	Prior to commencement of construction, all outdoor lighting within the site must comply with AS 1158.3.1:2005 Lighting for roads and public spaces- Pedestrian area (Category P) lighting - Performance and design requirements and AS 4282-1997 Control of the obtrusive effects of outdoor lighting. Details demonstrating compliance with these requirements must be submitted to the satisfaction of the Certifying Authority	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Access for People with Disabilities</b>				
B19	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 Certifying Authority 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.	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Construction Environmental Management Plan</b>				

B20	<p>Prior to commencement of construction, the Applicant must prepare a Construction Environmental Management Plan (CEMP) and it must include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>a) Details of: <ul style="list-style-type: none"> <li>i. hours of work;</li> <li>ii. 24-hour contact details of site manager;</li> <li>iii. management of dust and odour to protect the amenity of the neighbourhood;</li> <li>iv. stormwater control and discharge;</li> <li>v. measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;</li> <li>vii. groundwater management plan including measures to prevent groundwater contamination;</li> <li>viii. external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting;</li> <li>ix. community consultation and complaints handling;</li> </ul> </li> <li>b) Construction Traffic and Pedestrian Management Sub-Plan (see condition B22);</li> <li>c) Construction Noise and Vibration Management Sub-Plan (see condition B23);</li> <li>d) Construction Waste Management Sub-Plan (see condition B24);</li> <li>e) Construction Soil and Water Management Sub-Plan (see condition B25);</li> <li>f) an unexpected finds protocol for contamination and associated communications procedure;</li> <li>g) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and</li> <li>h) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site</li> </ul>	<p>Alexandria Park Community School No:1161 Construction Environmental Management Plan (CEMP) 14 March 2019</p> <p>Reference of Heritage Management Plan, April 2019. Refer CoC B5.</p> <p>Construction Traffic and Pedestrian Management Sub-Plan, Craig Reeves (no date or revision number)</p> <p>Construction Noise Vibration Management Plan (CNVMSP), Acoustic Logic, March 2019. Refer CoC B23</p> <p>Construction Soil and Water Management Plan, SCP Engineers and Development Consultants, 6 March 2019. Refer CoC 25</p> <p>Construction Waste Management Sub-Plan, comprising: DECC Construction Waste Management Plan, Alexandria Park Community School, Rev1; DECC Asbestos Management Removal Plan, Alexandria Park Community School, Rev1; Richard Crookes Constructions Hazardous Materials Management Plan Alexandria Park Community School</p>	<p>CEMP includes:</p> <ul style="list-style-type: none"> <li>a) (i) Details of hours of work, (ii) 24 hour contact details of site manager, (iii) management of dust and odour (iv) stormwater control and discharge and (v) sediment measures and (vii) groundwater (viii) external lighting (ix) Community Communications Strategy [CoC B16].</li> <li>b) Construction Traffic and Pedestrian Management Sub-Plan [this plan addresses item vi of this condition]</li> <li>c). Construction Noise and Vibration Management Sub-Plan</li> <li>d). Construction Waste Management Sub-Plan</li> <li>e). Construction Soil and Water Management Sub-Plan</li> <li>f). Unexpected finds protocol – contamination</li> <li>g). unexpected finds protocol for Aboriginal and Non Aboriginal Heritage, refer attached Heritage Management Plan CoC 5</li> <li>h). Waste Classification and Validation, refer documents Asbestos Management plan Rev 1. Construction Waste Management Plan rev 1 and Hazardous Materials Management Plan.</li> </ul>	Compliant
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Buckland Street, Alexandria NSW 2015, 3 April 2019.	Refer to responses to CoC B22 – B25 regarding the adequacy of the sub-plans.	
B21	The Applicant must not commence construction of the development until the CEMP is approved by the Certifying Authority and a copy submitted to the Planning Secretary.	<p>10/4/19 Schools Infrastructure NSW Submission APCS &amp; SSD8373: Certifier approved CEMP to DPE.</p> <p>8/4/19 BM+G Certifying Authority, accepted CEMP.</p> <p>5/4/19 Email Crown Certificate List of Requirements for Demolition [BM+G]</p> <p>CEMP Plan, 14 March 2019.</p> <p>CC1 issued 24/4/19</p>	Certifying Authority, Blackett Maguire and Goldsmith have accepted the CEMP and associated documents in response to CoC B20 and CoC B21.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B22	<p>The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person(s);</li> <li>b) be prepared in consultation with Council and RMS;</li> <li>c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services;</li> <li>d) detail heavy vehicle routes, access and parking arrangements;</li> <li>e) include a Driver Code of Conduct to: <ul style="list-style-type: none"> <li>i. minimise the impacts of earthworks and construction on the local and regional road network;</li> <li>ii. minimise conflicts with other road users;</li> <li>iii. minimise road traffic noise; and</li> <li>iv. ensure truck drivers use specified routes;</li> </ul> </li> <li>f) a program to monitor the effectiveness of these measures; and</li> <li>g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.</li> </ul>	<p>Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP), Craig Reeves (no date or revision specified).</p> <p>Correspondence from City of Sydney 23/05/19 and 30/05/19.</p>	<p>The CTPMSP adequately addresses requirements a), c), d), e), f), g).</p> <p><b>Non-compliance: whilst the CTPMSP states that the document was prepared in consultation with the relevant stakeholders, there is no evidence of consultation having occurred with RMS.</b></p>	Non-compliant

B23	<p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to , the following:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced noise expert;</li> <li>b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);</li> <li>c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</li> <li>d) include strategies that have been developed with the community for managing high noise generating works;</li> <li>e) describe the community consultation undertaken to develop the strategies in condition B23(d); and</li> <li>f) include a complaints management system that would be implemented for the duration of the construction.</li> </ul>	<p>Construction Noise Vibration Management Plan (CNVMSP), Acoustic Logic, January 2019.</p> <p>Consultant curriculum vitae</p>	<p>The CNVMSP adequately addresses requirements a), b), c), d) and f).</p> <p><b>Non-compliances</b>  <b>Requirement e):</b> The document states that consultation has occurred with affected receivers, but there is no detail provided as to how this consultation has assisted in the development of high noise management approach.</p> <p><b>Observation:</b> The complaints management system does not refer to the complaints management processes and benchmarks as set out in the CCS. The CNVMSP does not address the requirement set out in CoC C8, C17, C20. It is unclear how the Project would comply with these requirements if following the CNVMSP.</p> <p>Section 11 of the CNVMSP provides an overview of the management approach when noise or vibration levels are predicted to exceed the applicable criteria. There is no detail provided as to how RCC would determine the predicted impact arising for a given activity would comply with the criteria or not.</p> <p>The CNVMSP commits to noise monitoring being carried out from time to time and does not specify any methodology. It would be beneficial to provide the construction team with greater</p>	Non-compliant
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			guidance on when monitoring should be undertaken and how it should be undertaken (AS1055). The CNVMP does not detail whether the noise penalties specified in the ICNG have been applied to the NMLs for potentially annoying noise characteristics.	
B24	<p>The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>(a) detail the quantities of each waste type generated during construction and the proposed reuse , recycling and disposal locations;</li> <li>(b) 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 in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works</li> </ul>	<p>DECC Construction Waste Management Plan, Alexandria Park Community School, Rev1</p> <p>DECC Asbestos Management Removal Plan, Alexandria Park Community School, Rev1 (AMP)</p> <p>Richard Crookes Constructions Hazardous Materials Management Plan Alexandria Park Community School Buckland Street, Alexandria NSW 2015, 3 April 2019 (HMMP)</p>	<p>The Project has prepared three documents to address waste and hazardous materials management. In combination the documents address the requirements of this condition. It is understood that the Hazardous Materials Management Plan is the overarching plan dealing with hazardous materials for the Project. The DECC waste and Asbestos Plan are specific for their works.</p> <p><b>Observation: Given the DECC waste management plan covers demolition only, an updated CWMSP will need to be prepared for works outside of their scope.</b></p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B25	<p>The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified expert, in consultation with Council;</li> <li>(b) describe all erosion and sediment controls to be implemented during construction;</li> <li>(c) 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);</li> <li>(d) detail all off-Site flows from the Site; and</li> <li>(e) 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 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI)</li> </ul>	<p>Construction Soil and Water Management Plan, SCP Engineers and Development Consultants, 6 March 2019.</p> <p>Author curriculum vitae</p>	<p>The CSWMSP adequately addresses part of requirements a), and addresses requirements b), c).</p> <p><b>Non-compliance: There is no evidence that document was prepared in consultation with Council. There is no information in the plan that details measures to be implemented under the 1:100 year ARI storm events.</b></p>	Non-compliant
<b>Construction Parking</b>				
B26	The Applicant must provide sufficient parking facilities on-site for heavy vehicles (unless alternative parking is agreed to in writing by the relevant road authority), to ensure that construction traffic associated with the development does not utilise on-street parking or public parking facilities	<p>Included in APCS Site Induction.</p> <p>Observed site layout 04/06/19.</p>	Sufficient parking provided and requirements communicated to workforce.	Compliant
<b>Stormwater Management System</b>				
B27	<p>Prior to the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifying Authority. The system must:</p> <ul style="list-style-type: none"> <li>(a) be designed by a suitably qualified and experienced person(s);</li> <li>(b) be generally in accordance with the conceptual design in the EIS;</li> <li>(c) be in accordance with applicable Australian Standards;</li> <li>(d) 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;</li> </ul>	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Operational Noise- Design of Mechanical Plant and Equipment</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B28	Prior to commencement of construction, the Applicant must incorporate the noise mitigation recommendations in the report titled Alexandria Park Community School Development Application Acoustic Assessment, prepared by Wilkinson Murray and dated 19 April 2019, into the detailed design drawings. The Certifying Authority must verify that all reasonable and feasible noise mitigation measures have been incorporated into the design to ensure the development will not exceed the project noise trigger levels established based on the more conservative Rating Background Noise levels identified in the report titled Alexandria Park Community School Development Application Acoustic Assessment, prepared by Wilkinson Murray and dated 19 April 2019.	Refer to response to CoC A13	Refer to response to CoC A13	Not triggered
<b>Construction and Demolition Waste Management</b>				
B29	The Applicant must notify the RMS Traffic Management Centre of the truck route(s) to be followed by trucks transporting waste material from the site, prior to the commencement of the removal of any waste material from the site.	12/4/19 Email Mark Carruthers, RMS, Notification of Truck Routes	RMS Traffic Management notified of truck routes prior to commencement of work, via email 12/4/19, email reply of receipt received.	Compliant
<b>Operational Waste Storage and Processing</b>				
B30	Prior to the commencement of construction, the Applicant must obtain agreement from Council for the design of the operational waste storage area where waste removal is undertaken by Council.	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Mechanical Ventilation</b>				
B31	All mechanical ventilation systems must be designed in accordance with Part F4.5 of the BCA and must comply with the AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and AS/NZS 3666.1:2011 Air handling and water systems of buildings-Microbial control to ensure adequate levels of health and amenity to the occupants of the building and to ensure environment protection. Details must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction.	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Rainwater Harvesting</b>				
B32	Prior to the commencement of construction, the Applicant must ensure that a rainwater reuse/harvesting system for the development is developed for the site. A rainwater re-use plan must be prepared and certified by an experienced hydraulic engineer.	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Car Parking and Service Vehicle Layout</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B33	<p>Compliance with the following requirements must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction:</p> <ul style="list-style-type: none"> <li>(a) all vehicles must enter and leave the Site in a forward direction;</li> <li>(b) minimum of 28 on-site car parking spaces for use during operation of the development and designed in accordance with the latest version of AS2890.1;</li> <li>(c) the swept path of the longest vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the Site, must be in accordance with AUSTROADS; and</li> <li>(d) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed.</li> </ul>	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Bicycle Parking and End-of-Trip Facilities</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B34	<p>Compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction:</p> <ul style="list-style-type: none"> <li>(a) the provision of a minimum 144 bicycle parking spaces, comprising a minimum 20 staff, 100 secondary student and 30 primary school student bicycle parking spaces;</li> <li>(b) the provision of details identifying the suitable relocation of the 15 student bicycle parking spaces clear of the Belmont Street staff car park/indoor sports hall, to minimise the risk of conflict between motor vehicles and student cyclists;</li> <li>(c) the provision details of the proposed lightweight canopy to ensure a minimum 50 per cent of student bicycle parking spaces (i.e. 75 spaces) are suitably weather protected;</li> <li>(d) details of any proposed staged delivery of bicycle parking spaces to ensure the demand generated during staged redevelopment is met;</li> <li>(e) the layout, design and security of bicycle facilities must comply with the minimum requirements of AS 2890.3:2015 Parking facilities - Bicycle parking, and be located in easy to access, well-lit areas that incorporate passive surveillance;</li> <li>(f) the provision of end-of-trip facilities for staff in accordance with the ESD Design &amp; As Built rating tool, including a minimum 2 staff shower facilities;</li> <li>(g) appropriate pedestrian and cyclist advisory signs are to be provided; and</li> <li>(h) all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority.</li> </ul>	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Public Domain Works</b>				
B35	<p>Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifying Authority that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management.</p> <p>The Applicant must submit documentation of approval for each stage from Council to the Certifying Authority.</p>	Works undertaken to date - observed 04/06/19	Only demolition works have occurred to date. No footpath or public domain works have commenced.	Not triggered
<b>Compliance Reporting</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B36	No later than two weeks before the date notified for the commencement of construction, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority. Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018). The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the Certifying Authority in writing at least seven days before this is done.	22/3/19 APCS CMRP  25/3/19 APCS Redevelopment - SSD 8373: Submission of Compliance Report to DPE.	CMRP submitted to the DPE and the Certifying Authority [Blackett Maguire + Goldsmith] on 25/3/19, > 2 weeks before 10/4/19 commencement of construction	Compliant
B37	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance	-	Noted	Not triggered
<b>Landscaping</b>				
B38	Prior to commencement of construction of the building, the Applicant must prepare a Landscape Management Plan to manage the approved landscaping works on-site, to the satisfaction of the Certifying Authority. The plan must: <ul style="list-style-type: none"> <li>(a) be generally in accordance with the approved landscape plan outlined in condition A2 prepared by Context Landscape Design Pty Ltd;</li> <li>(b) ensure that no more than 69 trees are removed from the site and identifies all existing trees to be retained (i.e. a minimum 47 trees);</li> <li>(c) detail the species to be planted on-site, including the 69 advanced compensatory trees 75 L to 100 L in size;</li> <li>(d) describe the monitoring and maintenance measures to manage revegetation and landscaping works;</li> <li>(e) be consistent with the Applicant's Management and Mitigation Measures in the EIS;</li> <li>(f) provide for the planting of trees and vegetation to soften the visual impact of the approved built form from the public domain and provide shade.</li> </ul>	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>Unencumbered Outdoor Play Space</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B39	Prior to the commencement of construction, plans are to be submitted to the Certifying Authority demonstrating that a minimum of 273 square metres of unencumbered outdoor play space is to be provided for the use of the pre-school/Out of School Hours service in accordance with regulation 108 of the Education and Care Services National Regulations.	Refer to response to CoC A13	Refer to response to CoC A13	Not Triggered.
<b>PART C DURING CONSTRUCTION</b>				
<b>Interpretation Strategy</b>				
C1	Within 6 months of commencement of construction, a Heritage Interpretation Strategy (HIS) must be prepared by a suitably qualified heritage consultant identifying the interpretive values of the site, and specifically Aboriginal heritage values across the site, and to provide direction for potential interpretive installations. A copy of the HIS must be submitted to the Certifying Authority.	Refer to response to CoC B1. Construction commenced 10/04/19.	Refer to response to CoC B1. Construction commenced 10/04/19.	Not Triggered.
<b>Approved Plans to be On-site</b>				
C2	A copy of the approved and certified plans, specifications and documents incorporating conditions of approval and certification must be kept on the Site at all times and must be readily available for perusal by any officer of the Department, Council or the Certifying Authority.	24/4/19 images of SSDA & Approved Development Plan Folder on site, signed Development Consent & signed plans.  Observed plans and documents on site 04/06/19	Approved and certified plans and documents were readily available (and observed) on site.	Compliant
<b>Site Notice</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C3	<p>A site notice(s):</p> <ul style="list-style-type: none"> <li>(a) must be prominently displayed at the boundaries of the site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifying Authority and Structural Engineer.</li> <li>(b) is to satisfy all but not be limited to, the following requirements: <ul style="list-style-type: none"> <li>i. minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size;</li> <li>ii. the notice is to be durable and weatherproof and is to be displayed throughout the works period;</li> <li>iii. the approved hours of work, the name of the 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; and</li> <li>iv. the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the site is not permitted.</li> </ul> </li> </ul>	<p>24/4/19 Image of Site Notice</p> <p>04/06/19 observed site notice</p>	<p>Site notice in place. And compliant with the requirements</p>	Compliant
<b>Operation of Plant and Equipment</b>				
C4	<p>All plant and equipment used on site, or to monitor the performance of the development must be:</p> <ul style="list-style-type: none"> <li>(a) maintained in a proper and efficient condition; and</li> <li>(b) operated in a proper and efficient manner</li> </ul>	<p>Example Plant Daily Inspection – Fault Report.</p> <p>Example Equipment Certificate of Conformance</p> <p>Example Safe Work Method Statement [SWMS] Checklist.</p> <p>Plant inspection checklists.</p> <p>Interview with auditees</p>	<p>Plant onboarding process includes inspections maintenance records, risk assessment (for high risk plant), SafeWork registration (for mobile cranes etc), operator licence check. Upon induction all plant operates must present their operating licences, otherwise they cannot use the plant.</p> <p>20 x pieces of plant have been onboarded since commencement.</p> <p>130 x personnel inducted.</p>	Compliant
<b>Demolition</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C5	Demolition work must comply with Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 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 Certifying Authority before the commencement of works.	23/4/19 Certification of Methodology for full building demolition of Buildings A, B and C. Tall Consulting Structural Engineers.  1/4/19 Demolition Control Plan.	Tall Consulting Structural Engineers certify that demolition methodology checking has been undertaken in accordance with AS2601 – The Demolition of Structures, 23 <sup>rd</sup> April 2019.	Compliant
<b>Construction Hours</b>				
C6	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7 am and 6 pm, Mondays to Fridays inclusive; and (b) between 7:30 am and 3:30 pm, Saturdays. No work may be carried out on Sundays or public holidays.	APCS Site Induction.  Example Site Induction Record.  Alexandria Park Community School CNVMP 8/3/19.  Complaints register 28/5/19	Approved project hours are included in project documentation and communicated to the workforce. Complaints received regarding noise were not in relation to out of hours works.  Section 10 of the CNVMP recommends more stringent periods of work, for works predicted to exceed 75dB(A) at the nearest receiver.	Compliant
C7	Activities may be undertaken outside of the hours in condition C6 if required: (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or (c) where the works are inaudible at the nearest sensitive receivers; or (d) where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works. Notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	Interview with auditees	No out of hours works occurred during the audit period.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C8	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: (a) 9 am to 12 pm, Monday to Friday; (b) 2 pm to 5 pm Monday to Friday; and (c) 9 am to 12 pm, Saturday.	APCS Site Induction.  Example Site Induction Record.  Alexandria Park Community School CNVMP 8/3/19.	Approved project hours are included in project documentation and communicated to the workforce.	Compliant
<b>Implementation of Management Plans</b>				
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	Implementation of the CEMP (and sub-plans) is assessed through audit of mitigation measures (Appendix B) and observation of site.	The management plans appear to have been implemented during the audit period.	Compliant
<b>Construction Traffic</b>				
C10	All construction vehicles (excluding worker 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 before stopping.	Included in APCS Site Induction.  Site inspection 04/06/19	All staff are instructed to keep construction vehicles inside the site. No issues observed on site	Compliant
<b>Road Occupancy Licence</b>				
C11	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	Interview with auditees  Site inspection 04/06/19	No works on public roads or paths during the audit period	Not triggered
<b>SafeWork Requirements</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C12	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.	<p>24/4/19 CCTV image &amp; 16/4/19 site photos.</p> <p>Site notice 04/06/19</p> <p>Site fencing and hoarding 04/06/19</p> <p>DECC Asbestos Management Removal Plan, Alexandria Park Community School, Rev1 (AMP)</p> <p>Richard Crookes Constructions Hazardous Materials Management Plan Alexandria Park Community School Buckland Street, Alexandria NSW 2015, 3 April 2019 (HMMP)</p> <p>Safework notification for asbestos removal work 16/04/19 – 2/5/2022</p> <p>ASP (Lic 210968) Asbestos Removal Control Plan.</p> <p>Asbestos air monitoring results 17/4/19 – 03/06/19</p> <p>Air quality monitoring detection &gt;0.01 &lt;0.02fml investigation 25/5/19 (analysis later showed not asbestos).</p> <p>Site inspection 04/06/19</p>	<p>The site is suitably secured to prevent unauthorised access.</p> <p>Work areas are suitably demarcated and separated (i.e.: exclusion zones, vehicle movement zones), material stockpiling well organised.</p> <p>Asbestos removal being carried out in accordance with Asbestos Removal Control Plan.</p> <p>Monitoring occurring daily. A single hit of fibres triggered a review of works and investigation (consistent with SafeWork Code of Practice). Analysis of sample showed the detection was not asbestos.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Hoarding Requirements</b>				
C13	<p>The following hoarding requirements must be complied with:</p> <ul style="list-style-type: none"> <li>(a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing;</li> <li>(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; and</li> <li>(c) the Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.</li> </ul>	<p>10/4/19 &amp; 17/4/19 Environmental Inspection Checklist.</p> <p>Site inspection 04/06/19</p>	<p>No B class hoarding on site. All hoarding is within project footprint (no Council approval required).</p> <p>No graffiti or advertising present</p>	Compliant
<b>No Obstruction of Public Way</b>				
C14	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under and circumstances. Non-compliance with this requirement will result in the issue of a notice by the relevant Authority to stop all works on site.	Site inspection 04/06/19	No obstruction of public way observed.	Compliant
<b>Construction Noise Limits</b>				

C15	<p>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.</p>	<p>Induction</p> <p>CNVMS</p> <p>Noise monitoring results report May 2019</p> <p>Notice from RCC to DECC (31/05/19) regarding noise monitoring results and mitigation measures to be put in place.</p> <p>DECC SWMS 14/05/19</p> <p>Site inspection 04/06/19</p>	<p>The Project has demonstrated that all reasonable and feasible steps are being undertaken to manage noise</p> <p>Training of personnel on ways to reduce noise impact (respite periods, choice of plant etc) as communicated via directions, induction and TBT has occurred.</p> <p>The use of hammers has been avoided, with demolition of concrete instead occurring via cutting and pulverising. Respite periods are being applied.</p> <p>The site is being set up so that site sheds will provide screening on the western boundary (the layout of the site does not allow for this on the southern boundary).</p> <p>Communication with the school is ongoing. Monitoring has been undertaken, with results and response occurring.</p> <p>Despite the Project demonstrating that reasonable and feasible controls are being implemented, the auditor recognises that purely as a result of the approved works, and the proximity to nearby receivers that exceedances of the NMLs are likely, as are complaints. 2 x noise complaints have been received to date. RCC should continue to monitor works and take opportunities for further noise</p>	Compliant
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			mitigation should they arise. This may include increased consultation on upcoming works with the residents on the southern and western boundaries.	
C16	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 C6.	8/4/19 Transmittal Admin Drawings for Information.  APCS Site Induction  Sample Site Induction Record.  16/4/19 Example Toolbox Meeting Minutes.  October 2018 APCS Early Works, Demolition & Associated Works [Design & Construct].	The material presented communicates a number of requirements relevant to the Project, in particular the Trade Conditions of Subcontract, which is quite comprehensive. The contract requirement align with the consent. A copy of the consent is also provided.  The Induction includes information relevant to the tasks being undertaken by the people undertaking construction works. 130 x people have been inducted to date.	Compliant
C17	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use audible movement alarms of a type that would minimise noise impacts on surrounding noise sensitive receivers	Interview with auditees	All plant on site has been fitted with non-tonal beepers. Note this excludes delivery vehicles for which the site does not have control over.	Compliant
C18	Any noise generated during construction of the development must not be offensive noise within the meaning of the Protection of the Environment Operations Act 1997 or exceed approved noise limits for the site.	Refer to responses to CoC C15, C16 and C17 and Appendix B	The noise impacts are as predicted in the EIS, appropriate controls are being implemented for the scope of works. Refer observation in response to CoC C25.	Compliant
<b>Vibration Criteria</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C19	<p>Vibration caused by construction at any residence or structure outside the site must be limited to:</p> <ul style="list-style-type: none"> <li>(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</li> <li>(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).</li> </ul>	<p>Vibration Monitoring Report 01/05/19 – 23/05/19</p> <p>Vibration monitoring alert tracking register.</p>	<p>Vibration loggers are installed within the project boundary, bolted to kerbs or similar. Installation is not at the receiver (foundation of nearest receiver to current active works is approx. 5m away).</p> <p>Loggers are set up to send an alert to project personnel when vibration (PPV) reaches 5mm/s (the lowest structural threshold for residential dwellings under DIN standard).</p> <p>There were 19 x events that triggered alerts with several in excess of 15mm/s. All events were investigated by RCC, with specialist advice from Acoustic Logic. For all 19 x events RCC and Acoustic Logic identified that levels did not pose risk of structural damage to adjacent structure or properties. There have been 2 x vibration related complaints to date. To note it is unlikely that the Project will be able to comply with CoC C19b). the CNVMSP has been prepared to address this (refer CoC C21), however more detail should be provided (refer response to CoC B23).</p>	Compliant
C20	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 C19	<p>Interview with auditees</p> <p>Site inspection 04/06/19</p>	No vibratory compaction works have occurred during the audit period	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C21	The limits in conditions C19 and C20 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B23 of this consent.	Construction Noise Vibration Management Plan (CNVMSP), Acoustic Logic, January 2019.	The CNVMSP has been prepared so that it establishes a process whereby exceedances of the criteria are managed however further detail should be provided. Refer response to CoC B23.	Compliant
<b>Tree Protection</b>				
C22	<p>For the duration of the construction works:</p> <ul style="list-style-type: none"> <li>(a) 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;</li> <li>(b) all street trees must be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council;</li> <li>(c) all trees on the site must be suitably protected during construction as per</li> <li>(d) recommendations of the report titled Report: A) Arboricultural Impact Assessment and B) Tree Management Plan, prepared by Redgum Horticultural and dated 2 December 2018; and</li> <li>(e) 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.</li> </ul>	<p>Dec 18 Arboricultural Impact Assessment &amp; Tree Management Plan &amp; Tree Protection Plan.</p> <p>Site inspection 04/06/19</p>	<p>No street trees have been trimmed or removed.</p> <p>All trees at risk of being damaged have tree protection zones or other protection in place.</p>	Compliant
<b>Flora and Fauna Protection</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C23	During construction works, the Applicant must comply with the recommendations in the report titled Technical Studies: Flora & Fauna Survey for the Proposed Redevelopment of Alexandria Park Community School, Alexandria, prepared by UBM Ecological and dated 24 April 2018.	<p>Technical Studies: Flora &amp; Fauna Survey for the Proposed Redevelopment of Alexandria Park Community School, Alexandria, prepared by UBM Ecological and dated 24 April 2018</p> <p>Arboricultural report, Redgum, 22/5/19</p> <p>Site inspection 04/06/19</p>	<p>The report recommendations relate to retaining mature trees where possible, protecting trees to be retained, replant for trees that are removed, enhance habitats where possible, carry out preclearance surveys, stop works if unexpected fauna identified during works.</p> <p>Only demolition works have occurred to date, trees marked for removal during stage 1 have been surveyed and removed. Trees marked for retention are protected.</p>	Compliant
<b>Dust Minimisation</b>				
C24	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	<p>23/05/19 Toolbox Talks</p> <p>DECC SWMS 14/05/19</p> <p>RCC inspection reports 03/06/19, 29/05/19, 22/05/19, 10/05/19, 30/04/19, 17/04/19, 10/04/19</p> <p>DECC daily environmental inspection checklists 24/04/19 – 03/06/19.</p> <p>Site inspection 04/06/19</p> <p>CCTV footage</p>	<p>The Project is using hoses and sprinklers to manage dust.</p> <p>The toolbox talks and prestarts cover weather.</p> <p>The inspections carried out include checks of dust emissions.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C25	During construction, the Applicant must ensure that: <ul style="list-style-type: none"> <li>(a) exposed surfaces and stockpiles are suppressed by regular watering;</li> <li>(b) all trucks entering or leaving the site with loads have their loads covered;</li> <li>(c) trucks associated with the development do not track dirt onto the public road network;</li> <li>(d) public roads used by these trucks are kept clean; and</li> <li>(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</li> </ul>	Refer response to CoC C24	Refer response to CoC C24  The covering of truck loads is included in the CTPMSP Code of Conduct.  No material tracking was observed as the slab is still intact.  Earthworks have not commenced.	Compliant
<b>Air Quality Discharges</b>				
C26	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	The project does not hold an EPL	The project does not hold an EPL	Not triggered
<b>Erosion and Sediment Control</b>				
C27	All erosion and sediment control measures, must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment.	Site inspection 04/06/19  Construction Soil and Water Management Plan, SCP Engineers and Development Consultants, 6 March 2019.	The erosion and sediment control devices were all passive controls and set up as per the as per the initial erosion and sediment control plan for current works.	Compliant
<b>Imported Soil</b>				
C28	The Applicant must: <ul style="list-style-type: none"> <li>(a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site;</li> <li>(b) keep accurate records of the volume and type of fill to be used; and</li> <li>(c) make these records available to the Certifying Authority upon request.</li> </ul>	DECC Waste register  Boral aggregate test reports 03/04/19	Only aggregate product from Boral has been imported to the site (which is covered under EPA exemption). Boral test reports and certifications accompanied the loads. Both the certificates and the waste register match and include type and volume.	Compliant
<b>Disposal of Seepage and Stormwater</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C29	Any seepage or rainwater collected on-site during construction or groundwater must not be pumped to the street stormwater system unless separate prior approval is given in writing by the EPA in accordance with the Protection of the Environment Operations Act 1997.	Interviews with auditees  Site inspection 04/06/19	<p>There are no sumps or basins on site that require discharge. All controls are passive and the slab is still intact.</p> <p>This standard condition is problematic as the EPA is generally reluctant to licence non-scheduled activities unless otherwise justified by the applicant. This means that the Project must reuse all water captured on site or pay for it to be removed as liquid waste or tradewaste. The auditor notes that generally Sydney Water are also reluctant to permit disposal of rainwater captured on construction sites to sewer due to sediment loading.</p> <p>Considering the supposed intention of this condition (to prevent the pollution of waters), the auditor suggests the Project contact the Department to seek clarification as to whether discharges to stormwater without EPA approval are considered a contravention of the consent even if the discharges comply with S120 of the POEO Act (and do not result in the pollution of waters).</p>	Not triggered
Unexpected Finds Protocol- Aboriginal Heritage				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C30	In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by OEH and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and OEH to develop and implement management strategies for all objects/sites. Works shall only recommence with the written approval of OEH.	Interview with auditees  Site inspection 04/06/19  Aboriginal Cultural Heritage Management Plan, Version 1 March 2019 and Version 3 May 2019, AMAC & Streat Archaeological Services.	Only demolition has occurred. The Aboriginal Heritage Management Plan pg 51 concludes that demolition of building including slabs to not disturb any archaeological remains.  No unexpected finds to date.	Not triggered
<b>Unexpected Finds Protocol- Historic Heritage</b>				
C31	If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and the OEH Heritage Division contacted. 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. Works may only recommence with the written approval of Heritage Division of the OEH.	Interview with auditees  Site inspection 04/06/19  Aboriginal Cultural Heritage Management Plan, Version 1 March 2019 and Version 3 May 2019, AMAC & Streat Archaeological Services.	Only demolition has occurred. The Aboriginal Heritage Management Plan pg 51 concludes that demolition of building including slabs to not disturb any archaeological remains.  No unexpected finds to date.	Not triggered
<b>Waste Storage and Processing</b>				
C32	Waste 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 inspection 04/06/2019	Waste was observed to be segregated, secured and confined to the site	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C33	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	<p>DECC waste register</p> <p>4 x Transport Certificates for liquid waste (solvents, acids, bases, paints)</p> <p>EPA Online Waste Tracking Tool registration (disposal to EPL 20696).</p> <p>Tip dockets 16/05/19, 29/04/19</p> <p>EPA Consignment Authorisation 29/04/19</p>	<p>The majority of wastes are pre-classified as building and demolition waste (GSW), asbestos waste. These are being recorded in the waste register which identifies the material type, volume, load date, tip site (all licenced waste facilities – no development sites attracting s143 cert). Hazardous materials are all going to SUEZ Kemps Creek. 4 x loads of asbestos and 6 x loads of SMF (with lead dust present) have been sent to date. Tip docket dates and volumes match the waste register.</p> <p>The Project is using the EPA online Waste Tracking Tool for disposal of hazardous and liquid wastes. This requires hold and release by the EPA system and provides a report that can be used to verify appropriate disposal.</p> <p>Payment to waste transporter is only made on dockets after verification.</p>	Compliant
C34	The body of any vehicle or trailer used to transport waste or excavation spoil must be covered before leaving the premises to prevent any spillage or escape of any dust, waste of spoil. Mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site must be removed before leaving the premises.	<p>Site inspection 04/06/19</p> <p>Refer response to CoC C24 and C25</p>	<p>Refer response to CoC C24 and C25</p> <p>No issues observed. Controls available and rules communicated to Project personnel.</p>	Compliant
C35	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural of artificial watercourse.	Site inspection 04/06/19	No concreting works, demolition only.	Not triggered
<b>Handling of Asbestos</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C36	The Applicant is to 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.	Safework notice for removal of asbestos (friable and non-friable) 16/04/19 – 02/05/22	ASP (asbestos removal licence 210968) registered removal with safework.  Refer response to CoC C33 regarding transport and management of asbestos waste.	Compliant
<b>Community Engagement</b>				
C37	The Applicant must consult with the community regularly throughout construction, including consultation with the nearby sensitive receivers identified in the EIS, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders.	Interview with auditees  Project update April 2019 and May 2019  Distribution maps for Project updates.  Website <a href="https://www.schoolinfrastrucure.nsw.gov.au/projects/a/al-exandria-park-community-school.html">https://www.schoolinfrastrucure.nsw.gov.au/projects/a/al-exandria-park-community-school.html</a>  Aboriginal Cultural Heritage Management Plan, Version 1 March 2019 and Version 3 May 2019, AMAC & Streat Archaeological Services.  Staging Strategy Application 23/05/19	The Project has demonstrated ongoing consultation with the school, DPE, RAPs, and nearby properties.  Refer to response to CoC C15 regarding opportunities for increased consultation with properties on western and southern boundaries.	Compliant
<b>Independent Environmental Audit</b>				
C38	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an Independent Audit Program or commencement of an Independent Audit	DPE approval of auditors 01/05/19	On 01/05/19 the Department approved the auditors.	Compliant
C39	No later than four weeks after the date notified for the commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.	Independent Audit Program submission 15/05/19	Construction commenced 29/04/19. The program was submitted ~2 weeks after commencement.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C40	Table 1 of the Independent Audit Post Approval Requirements (Department 2018) is amended so that the frequency of audits required in the construction phase is: <ul style="list-style-type: none"> <li>(a) an initial construction Independent Audit must be undertaken within 8 weeks of the notified commencement date of construction; and</li> <li>(b) a subsequent Independent Audit of construction must be undertaken no later than 26 weeks from the date of the initial construction Independent Audit.</li> </ul>	Independent Audit Program V1, 13/05/19	The schedule reflect this condition	Compliant
C41	Independent Audits of the development must be carried out in accordance with: <ul style="list-style-type: none"> <li>(a) the Independent Audit Program submitted to the Department and the Certifying Authority under condition C38 of this consent; and</li> <li>(b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).</li> </ul>	This audit	This audit occurred in the time frame specified in the Independent Audit Program and addressed the requirements and methodologies in the IAPAR.	Compliant
C42	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: <ul style="list-style-type: none"> <li>(a) review and respond to each Independent Audit Report prepared under condition C41 of this consent;</li> <li>(b) submit the response to the Department and the Certifying Authority; and</li> <li>(c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Department and notify the Department and the Certifying Authority in writing at least seven days before this is done.</li> </ul>	These activities occur following finalisation of this audit report.	These activities occur following finalisation of this audit report.	Not triggered.
C43	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational audits to cease, where it has been demonstrated to the Planning Secretary's satisfaction that ongoing operational audits are no longer required	Works are in early stages of construction.	Works are in early stages of construction.	Not triggered.
<b>Incident Notification, Reporting and Response</b>				
C44	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> 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.	Interview with auditees  Incident register	No notifiable incidents identified in the audit period.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	Subsequent notification must be given, and reports submitted in accordance with the requirements set out in Appendix 1.			
<b>Non-Compliance Notification</b>				
C45	<p>The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Department in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after they identify any non-compliance.</p> <p>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.</p> <p>A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p>	<p>Interview with auditees</p> <p>Incident register</p>	<p>No known non-compliances identified.</p> <p>Non-compliances confirmed as part of this Independent Audit will need to be reported in accordance with this condition.</p>	Not triggered
<b>Revision of Strategies, Plans and Programs</b>				
C46	<p>Within three months of:</p> <ul style="list-style-type: none"> <li>(a) the submission of a compliance report under condition B36;</li> <li>(b) the submission of an incident report under condition C44;</li> <li>(c) the submission of an Independent Audit under condition C41;</li> <li>(d) the issue of a direction of the Planning Secretary under condition A2 which requires a review,</li> </ul> <p>the strategies, plans and programs required under this consent must be reviewed, and the Department and the Certifying Authority must be notified in writing that a review is being carried out.</p>	<p>Interview with auditees</p> <p>Preconstruction compliance report 24/04/19</p> <p>Incident register</p>	<p>The need to conduct a review occurs three months from the submission of the Preconstruction Compliance Report (being 24/07/2019).</p>	Not triggered
C47	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Certifying Authority. Where revisions are required, the revised document must be submitted to the Certifying Authority for approval within six weeks of the review.</p> <p>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</p>	<p>Interview with auditees</p>	<p>No updates have been required as yet</p>	Not triggered
<b>PART D PRIOR TO OCCUPATION OR COMMENCEMENT OF USE</b>				
<b>Notification of Occupation</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D1	The date of commencement of the occupation of the development must be notified to the Department in writing, at least one month before occupation. If the operation of the development is to be staged, the Department 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
<b>External Walls and Cladding</b>				
D2	Prior to the occupation of the building, the Applicant must provide the Certifying Authority 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	The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it			Not triggered
<b>Post-construction Dilapidation Report</b>				
D4	<p>Prior to occupation of the building, the Applicant must engage a suitably qualified person to prepare a post-construction dilapidation report at the completion of construction. This report is:</p> <ul style="list-style-type: none"> <li>(a) to ascertain whether the construction created any structural damage to adjoining buildings or infrastructure.</li> <li>(b) to be submitted to the Certifying Authority. In ascertaining whether adverse structural damage has occurred to adjoining buildings or infrastructure, the Certifying Authority must: <ul style="list-style-type: none"> <li>i. compare the post-construction dilapidation report with the pre-construction dilapidation report required by these conditions; and</li> <li>ii. have written confirmation from the relevant authority that there is no adverse structural damage to their infrastructure and roads.</li> </ul> </li> <li>(c) to be forwarded to Council.</li> </ul>			Not triggered
<b>Protection of Public Infrastructure</b>				
D5	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and</li> <li>(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development.</li> </ul>			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions required by Error! Reference source not found, of this consent. (note direct quote from consent)			
<b>Utilities and Services</b>				
D6	Prior to occupation of the building, a compliance certificate under the section 307 of the Water Management Act 2000 must be obtained from Council and submitted to the Certifying Authority.			Not triggered
<b>Works as Executed Plans</b>				
D7	Prior to occupation of the building, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifying Authority.			Not triggered
<b>Operational Transport and Access Management Plan</b>				
D8	<p>An OTAMP is to be prepared for the school (or separately for each school) by a suitably qualified person, in consultation with Council, Transport for NSW and RMS, to the satisfaction of the Secretary, and must address the following:</p> <ul style="list-style-type: none"> <li>a) 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;</li> <li>b) the location of all car parking spaces on the school campuses and their allocation (i.e. staff , visitor, accessible, emergency, etc.);</li> <li>c) the location and operational management procedures of the pick-up and drop-off parking, including staff management/traffic controller arrangements;</li> <li>d) the location and operational management procedures for the pick-up and drop-off of students by buses and coaches for excursions and sporting activities during the hours of bus lane operations, including staff management/traffic controller arrangements;</li> <li>e) delivery and services vehicle and bus access and management arrangements;</li> <li>f) management of approved access arrangements;</li> <li>g) potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to</li> </ul>			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>mitigate queuing impacts associated with vehicles accessing pick-up and drop-off parking;</p> <p>h) car parking arrangements and management associated with the proposed use of school facilities by community members; and</p> <p>i) a monitoring and review program.</p> <p>The OTAMP(s) must be submitted to the Secretary for approval prior to operation of the development.</p> <p>The OTAMP(s) (as revised from time to time) must be implemented by the Applicant for the life of the development</p>			
<b>Green Travel Plan</b>				
D9	<p>Prior to the commencement of operation, a Green Travel Plan (GTP), must be prepared and be submitted to the Secretary to promote the use of active and sustainable transport modes. The plan must:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified traffic consultant in consultation with Council and Transport for NSW;</li> <li>b) include objectives and modes share targets (i.e. Site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP;</li> <li>c) include specific tools and actions to help achieve the objectives and mode share targets;</li> <li>d) include 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 GTP; and</li> <li>e) include details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of students and staff to and from both schools at appropriate times throughout the academic year.</li> </ul>			Not triggered
<b>Parking Restrictions</b>				
D10	<p>Prior to the commencement of operations of Phase 1, the Applicant must submit to Council, for approval from Council's Pedestrian Cycling and Traffic Calming Committee, documentation for the installation of '15P Parking' and associated 'No Parking' restrictions on the southern side of Buckland Street in accordance with the Transport Assessment titled Alexandria Park Community School, prepared by ARUP and dated 29 November 2018. The restrictions are</p>			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>to apply on a part-time basis on School Days only between 8 am to 9.30 am and 2.30 pm- 4 pm.</p> <p>Any fees associated with reporting to the Pedestrian Cycling and Traffic Calming Committee must be paid by the Applicant prior to processing the application. The installation of the signs must be at no cost to Council.</p> <p>Evidence of approval and installation of relevant signage must be submitted to the Planning Secretary prior to the commencement of operations of Phase 1.</p>			
<b>Evacuation and Emergency Management Plan</b>				
D11	<p>No later than six weeks prior to the commencement of operations, an Operational Flood Evacuation and Emergency Management Plan (OFEMP) must be prepared by a suitably qualified person in consultation with the NSW State Emergency Services (SES) and Council and in accordance with Floodplain Risk Management Guideline (OEH, 2007). The plan should detail specific flood emergency measures required to be incorporated into the detailed design to mitigate impacts of a range of flood events up to and including the PMF and include measures to manage flood impacts outside the site to ensure accessibility is maintained. The plan must include details of:</p> <ul style="list-style-type: none"> <li>a) predicted flood levels;</li> <li>b) flood warning time and flood notification;</li> <li>c) assembly points and evacuation routes;</li> <li>d) shelter in place, evacuation and refuge protocols; and</li> <li>e) awareness training for employees and contractors.</li> </ul> <p>A copy of the Plan must be submitted to the NSW SES, Council and the Planning Secretary.</p>			Not triggered
<b>Mechanical Ventilation</b>				
D12	<p>Following completion, installation and testing of all mechanical ventilation systems, the Applicant must provide evidence to the satisfaction of the Certifying Authority, prior to the final occupation, that the installation and performance of the mechanical systems complies with:</p> <ul style="list-style-type: none"> <li>a) the BCA;</li> <li>b) AS 1668.2-2012 The use of air-conditioning in buildings- Mechanical ventilation in buildings and other relevant codes;</li> <li>c) the development consent and any relevant modifications; and</li> <li>d) any dispensation granted by the NSW Fire Brigade.</li> </ul>			Not triggered
<b>Road Damage</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D13	The cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Subject Site as a result of construction works associated with the approved development is to be met in full by the Applicant prior to commencement of use of any stage of the development.			Not triggered
<b>Fire Safety Certification</b>				
D14	Prior to the final 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
<b>Structural Inspection Certificate</b>				
D15	<p>A Structural Inspection Certificate or a Compliance Certificate must be submitted to the satisfaction of the Certifying Authority prior to the occupation of the relevant parts of any new or refurbished buildings. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the approval authority and the Council after:</p> <ul style="list-style-type: none"> <li>a) the site has been periodically inspected and the Certifying Authority is satisfied that the structural works is deemed to comply with the final design drawings; and</li> <li>b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.</li> <li>c) person/s authorised to, for the life of the development</li> </ul>			Not triggered
<b>Compliance with Food Code</b>				
D16	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. The Applicant must provide evidence of receipt of the certificate to the satisfaction of the Certifying Authority prior to occupation.			Not triggered
<b>Stormwater Quality Management Plan</b>				
D17	<p>Prior to occupation of the building, an Operation and Maintenance Plan (OMP) is to be prepared to ensure proposed stormwater quality measures remain effective. The OMP must contain the following:</p> <ul style="list-style-type: none"> <li>a) maintenance schedule of all stormwater quality treatment devices;</li> <li>b) record and reporting details;</li> <li>c) relevant contact information; and</li> <li>d) Work Health and Safety requirements</li> </ul>			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D18	Details demonstrating compliance must be submitted to the Certifying Authority prior to occupation.			Not triggered
<b>Rainwater Harvesting</b>				
D19	A signed works-as-executed Rainwater Re-use Plan must be provided to the Certifying Authority prior to occupation of the building.			Not triggered
<b>Outdoor Lighting</b>				
D20	<p>The Applicant must ensure the installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers. Outdoor lighting must:</p> <ul style="list-style-type: none"> <li>a) comply with the latest version of AS 4282-1997 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and</li> <li>b) be mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.</li> </ul> <p>Upon installation of outdoor lighting, but before it is finally commissioned, the Applicant must submit to the Certifier evidence from a qualified practitioner demonstrating compliance in accordance with this condition.</p>			Not triggered
<b>Warm Water Systems and Cooling Systems</b>				
D21	The installation, 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 Parts 1 and 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
<b>Signage</b>				
D22	Way-finding signage and signage identifying the location of staff car parking must be installed prior to occupation.			Not triggered
D23	Bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas prior to occupation.			Not triggered
D24	'Do not drink' signage on non-potable water used for toilet flushing and to new hose taps and irrigation systems for landscaped areas must be installed within the site prior to occupation.			Not triggered
<b>Operational Waste Management Plan</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D25	<p>Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Certifying Authority. The Waste Management Plan must:</p> <ul style="list-style-type: none"> <li>a) detail the type and quantity of waste to be generated during operation of the development;</li> <li>b) 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);</li> <li>c) detail the materials to be reused or recycled, either on or off site; and</li> <li>d) include the Management and Mitigation Measures included in RtS</li> </ul>			Not triggered
<b>Validation Report</b>				
D26	<p>The Applicant must prepare a Validation Report for the development. The Validation Report must:</p> <ul style="list-style-type: none"> <li>a) be prepared by an appropriately qualified environmental consultant and reviewed by an EPA accredited Site Auditor;</li> <li>b) be submitted to EPA, the Planning Secretary and the Certifying Authority for information one month after the completion of remediation works;</li> <li>c) be prepared in accordance with the RAP, as required to be updated in accordance with condition B9 , and the Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites (OEH, 2011);</li> <li>d) include, but not be limited to: <ul style="list-style-type: none"> <li>i. comment on the extent and nature of the remediation undertaken;</li> <li>ii. describe the location, nature and extent of any remaining contamination on site;</li> <li>iii. results of sampling of treated material, compared with the treatment criteria in the report titled Detailed Site Investigation, Alexandria Park Community School, Park Road , Alexandria NSW, prepared by Coffey and dated 26 October 2017 or as agreed by the site auditor;</li> <li>iv. results of any validation sampling, compared to relevant guidelines/criteria;</li> </ul> </li> </ul>			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	v. discussion of the suitability the remediated areas for the intended land use; and vi. any other requirement relevant to the project			
<b>Site Audit Report and Site Audit Statement</b>				
D27	Prior to occupation of the building, the Applicant must obtain from an EPA accredited Site Auditor , a Site Audit Statement and a Site Audit Report which demonstrates that the site is suitable for its intended use(s).			Not triggered
D28	Within three months of submission of the Validation Report required by condition D26, the Applicant must demonstrate to the satisfaction of the Certifying Authority that the Site Auditor has submitted a Site Audit Report and Site Audit Statement to EPA in accordance with the requirements of EPA's Guidelines for the NSW Site Auditor Scheme (DEC, 2006).			Not triggered
<b>Landscaping</b>				
D29	Following completion of all demolition work, the Applicant must undertake all landscape works detailed in the Landscape Management Plan required by condition B38 to the satisfaction of the Certifying Authority.			Not triggered
<b>Ecologically Sustainable Development</b>				
D30	Within 6 months of commencement of operation, Green Star certification must be obtained demonstrating the development achieves a minimum 4 star Green Star As Built rating, unless otherwise agreed by the Planning Secretary. Evidence of the certification must be provided to the Certifying Authority and the Planning Secretary			Not triggered
<b>PART E POST OCCUPATION</b>				
<b>Operation of Plant and Equipment</b>				
E1	All plant and equipment used on site, or to monitor the performance of the development must be: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.			Not triggered
<b>Community Communication Strategy</b>				
E2	The Community Communication Strategy, as approved by the Planning Secretary, must be implemented for a minimum of 12 months following the completion of construction.			Not triggered
<b>Out of Hours Event Management Plan</b>				
E3	The Applicant is to prepare an Out of Hours Event Management Plan for out of hours events run by the school that involve 100 or more people. The plan must be prepared in consultation with Council, and include the following:			Not triggered



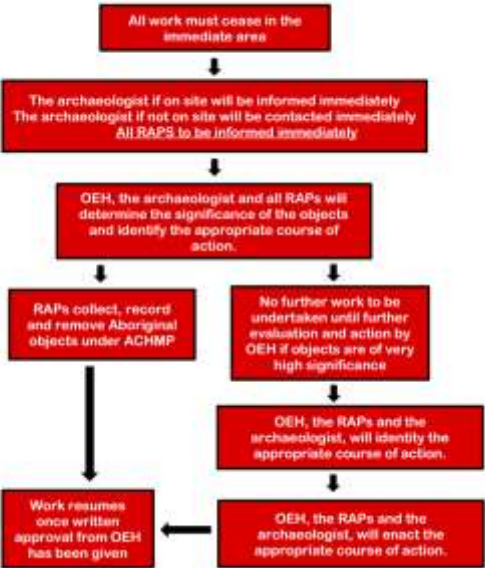
Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>a) the number of attendees, time and duration;</li> <li>b) arrival and departure times and modes of transport;</li> <li>c) where relevant, a schedule of all annual events;</li> <li>d) demonstrate measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport);</li> <li>e) measures to minimise localised traffic and parking impacts; and</li> <li>f) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.</li> </ul> <p>The Applicant must submit a copy of the Out of Hours Event Management Plan to the Department and to the Council, prior to commencement of the first event.</p> <p>The Out of Hours Event Management Plan must be implemented by the Applicant for the duration of the identified events or use.</p>			
E4	<p>The Applicant is to prepare an Out of Hours Event Management Plan for out of hours events run by external parties that involve 100 or more people. The plan must be prepared prior to each relevant event, in consultation with Council, and include the following:</p> <ul style="list-style-type: none"> <li>a) the number of attendees, time and duration;</li> <li>b) arrival and departure times and modes of transport;</li> <li>c) where relevant, a schedule of all annual events;</li> <li>d) demonstrate measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport);</li> <li>e) measures to minimise localised traffic and parking impacts; and</li> <li>f) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.</li> </ul> <p>The Applicant must submit a copy of the Out of Hours Event Management Plan to the Department and to the Council, prior to commencement of each relevant event.</p> <p>The Out of Hours Event Management Plan must be implemented by the Applicant for the duration of the identified community event or use.</p>			Not triggered
<b>Operational Noise Limits</b>				
E5	<p>The Applicant must ensure that noise generated by operation of the development does not exceed the project noise trigger levels established based on the more conservative Rating Background Noise levels as detailed in</p>			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	the report titled Alexandria Park Community School Development Application Acoustic Assessment, prepared by Wilkinson Murray and dated 19 April 2018.			
E6	The Applicant must undertake short term noise monitoring in accordance with the Noise Policy for Industry 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 to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in the report titled Alexandria Park Community School Development Application Acoustic Assessment, prepared by Wilkinson Murray and dated 19 April 2018. 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.			Not triggered
<b>After Hours Use of Outdoor Sports Courts and Playing Fields</b>				
E7	The use of the outdoor sports courts and playing fields is restricted as follows: <ul style="list-style-type: none"> <li>a) between 7:00 am and 10:00 pm, Mondays to Fridays for training and social recreation activities;</li> <li>b) between 8:00 am to 6:00 pm, Saturdays and Sundays for organised events and competitions; and</li> <li>c) no organised events on public holidays.</li> </ul>			Not triggered
E8	Notwithstanding E7 above, the outdoor sports courts and playing fields may operate between 6.00 pm to 10.00 pm, Saturdays and 6.00 pm to 8.00 pm on Sundays and public holidays for training and social recreation activities for a trial period of 6 months from the date of commencement of school operations. Notification of the commencement of use is to be submitted in writing to the Planning Secretary.			Not triggered
E9	Use of the outdoor sports courts and playing fields must be undertaken in accordance with the recommended noise mitigation measures detailed in the report titled Alexandria Park Community School Development Application Acoustic Assessment prepared by Wilkinson Murray and dated 19 April 2018.			Not triggered
E10	If investigation of complain(s), through appropriate noise testing, establishes that offensive noise has occurred or use of the outdoor sports courts and playing fields is in breach of conditions E7 to E9, and the complaint is justified, the Department may require by notice to the applicant, that the use and			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	operation of the outdoor sports courts and playing fields revert to the hours as detailed in condition E7.			
E11	A further application may be lodged to continue the operating hours in E8 above, before the end of the trial period. The Department's consideration of a proposed continuation of the hours permitted by the trial will be based on, among other things, performance of the school in managing the use of the outdoor courts and playing fields in relation to compliance with development consent conditions and any substantiated complaints.			Not triggered
<b>Unobstructed Driveways and Parking Areas</b>				
E12	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.			Not triggered
<b>Green Travel Plan</b>				
E13	The Green Travel Plan required by condition D9 of this consent must be updated annually and implemented.			Not triggered
<b>Outdoor Lighting</b>				
E14	Notwithstanding Condition D20, 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.			Not triggered
<b>Fire Safety Certificate</b>				
E13	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
<b>Landscaping</b>				
E14	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition B38 for the duration of occupation of the development.			Not triggered

## Appendix B. CEMP and Sub-plans

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Aboriginal Cultural Heritage Management Plan (CoC B5)</b>				
6.2.1	<ul style="list-style-type: none"> <li>Test excavation units will be located across the site in appropriate areas in order to maximise information about the site and to minimise impact to any historic archaeological deposits that remain in situ, where possible.</li> <li>Test excavation units must be excavated using hand tools only..</li> <li>Photographic and scale-drawn records of the stratigraphy/soil profile, features and informative Aboriginal objects must be made for each single excavation point.</li> <li>Following test and open area excavation, an Aboriginal Site Impact Recording form will be completed and submitted to the AHIMS Registrar as soon as practicable,</li> <li>Post settlement fills that do not contain either historic occupation deposits shall be removed with a machine excavator using a flat edged (mud) bucket under the direct supervision of an archaeologist.</li> <li>Machine excavation shall cease when intact pre - settlement soil horizons are encountered.</li> <li>All excavations of intact pre - settlement soil horizons including features shall be excavated with hand tools</li> </ul>	Interview with auditees	<b>Investigations were proceeding in accordance with the plan. The report presenting the findings of the report will be completed following completion of investigations and analyses.</b>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
8.1	<p><b>8.1 FLOW CHART FOR THE DISCOVERY OF UNEXPECTED ABORIGINAL ARCHAEOLOGICAL MATERIAL</b></p> 	<p>Interview with auditees</p> <p>Site inspection 04/06/19</p> <p>Aboriginal Cultural Heritage Management Plan, Version 1 March 2019 and Version 3 May 2019, AMAC &amp; Streat Archaeological Services.</p>	<p>Only demolition has occurred. The Aboriginal Heritage Management Plan pg 51 concludes that demolition of building including slabs to not disturb any archaeological remains.</p> <p>No unexpected finds to date.</p>	Not triggered
<b>Community Communications Strategy (CoC B16)</b>				
Table 4: 1300 community information line	The free call 1300 482 651 number is published on all communication materials and is manned by SINSW. The number will be available throughout the life of the project and accessible for 12 months post completion	Test phone call made by the auditor 06/06/19	The number was manned by SINSW personnel	Compliant
Table 4: Advertising (print)	Advertising in local newspapers is undertaken with at least 7 days' notice of significant construction activities, major disruptions and opportunities to meet the project team or find out more at a face to face	Extract of newspaper advert	Newspaper advertising was being used.	Compliant
Table 4: Information booths	Information booths are held locally and staffed by a project team member to answer any questions, concerns or complaints on the project. Info booths are scheduled from the early stages of project delivery through to project completion. Information booths are to be held both at the school/ neighbouring school, as well for the broad community:	<p>Information booth presentation material 14/05/19</p> <p>Photos of information booth 14/5/19</p>	<b>information booths are being deployed.</b>	Compliant


Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>School information booths are held at school locations at times that suit parents and caregivers, with frequency to be aligned with project milestones and as required.</li> <li>Community information booths are usually held at local shopping centres, community centres and places that are easily accessed by the community. They are held at convenient times, such as out of work hours on weekdays and Saturday's.</li> </ul>			
Table 5: Engagement Timeline – Site establishment works	For March 2019: <ul style="list-style-type: none"> <li>Information booth:               <ul style="list-style-type: none"> <li>Handout including FAQs and project update</li> <li>Display boards</li> <li>Information pack</li> </ul> </li> <li>Works notification to schools community and local residents</li> <li>Website update</li> </ul>	Project update for inclusion in school monthly newsletter  Project updates for April and May 2019.  <a href="https://www.schoolinfrastructure.nsw.gov.au/projects/a/alexandria-park-community-school.html">https://www.schoolinfrastructure.nsw.gov.au/projects/a/alexandria-park-community-school.html</a>	Refer above regarding information booth.  Works notifications and website updates occurring.	Compliant
<b>Construction Environmental Management Plan (CoC B20)</b>				
Toolbox talks	The Principal Contractor will also conduct weekly toolbox meetings with all personnel to review management procedures and identify / discuss daily site conditions and potential hazards. Site inductions and toolbox talks will highlight specific environmental requirements and activities being undertaken at the worksite each day. A record of issues covered in weekly toolbox meetings should be maintained for future audit.	General toolboxes 28/5/19, 21/5/19, 7/5/19, 24/9/19, 16/4/19  Task specific toolboxes 18/5/19 (drilling), 17/5/19 (asbestos air monitor detection), 16/5/19 (plant operations), 14/5/19 (demolition engineering brief), 3/5/19 (working around services)	Toolboxes talks are occurring frequently and include content describing project risks, controls and rules. All sighted have had the team sign on.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Air quality management actions	<p>Appropriate methods of dust suppression will be implemented, such as ensuring earthworks materials remain moist to ensure dust is minimised during works.</p> <p>Evaluate weather conditions prior to works commencing and during any change in wind direction.</p> <p>Covering of any stockpiles that are to remain for greater than two days (Waste reclassification or ENM stockpiles, ACM demolition stockpiles), or if weather forecasts predict strong winds; with plastic, Hessian or Geotechnical fabric material.</p>	<p>23/05/19 Toolbox Talks</p> <p>DECC SWMS 14/05/19</p> <p>RCC inspection reports 03/06/19, 29/05/19, 22/05/19, 10/05/19, 30/04/19, 17/04/19, 10/04/19</p> <p>DECC daily environmental inspection checklists 24/04/19 – 03/06/19.</p> <p>Site inspection 04/06/19</p> <p>CCTV footage</p>	<p>The Project is using hoses and sprinklers to manage dust.</p> <p>The toolbox talks and prestarts cover weather.</p> <p>The inspections carried out include checks of dust emissions.</p> <p>Covered stockpiles were observed in the field.</p>	Compliant
Asbestos dust management actions	<p>Use of water spray (onsite in close proximity of the earthworks and at the site boundary/fences) is required for dust suppressant during earthworks. Water sprays might be used during demolition works on the removal of ACM within the current buildings on the site (this is up to the discretion of the Project Manager and the environmental consultant)</p>	As above	As above	Compliant
Asbestos dust monitoring	<p>The air quality will be evaluated by the Project Manager and assessed by a suitably qualified environmental consultant. Continuous exclusion zone boundary monitoring during excavation works using asbestos air monitoring equipment is required. The air pumps should be calibrated to the required flow rate in accordance with Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2<sup>nd</sup> Edition [NC&gt;HSC:3003(2005)].</p> <p>Fence line sampling for Asbestos. Four (1) samples/day, airborne fibres testing in accordance with the NOHSC: 3003 (2005) method. Action level is 0.1 fibres/mL (with air monitoring filters to be situated within 10m of the location of asbestos removal work)</p>	<p>24/4/19 CCTV image &amp; 16/4/19 site photos.</p> <p>DECC Asbestos Management Removal Plan, Alexandria Park Community School, Rev1 (AMP)</p>	<p>Monitoring occurring daily. A single hit of fibres triggered a review of works and investigation (consistent with SafeWork Code of Practice). Analysis of sample showed the detection was not asbestos.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p>Richard Crookes Constructions Hazardous Materials Management Plan Alexandria Park Community School Buckland Street, Alexandria NSW 2015, 3 April 2019 (HMMP)</p> <p>Asbestos air monitoring results 17/4/19 – 03/06/19</p> <p>Air quality monitoring detection &gt;0.01 &lt;0.02fml investigation 25/5/19 (analysis later showed not asbestos).</p>		
Asbestos dust reporting	Maintenance of records on site of visual dust and Asbestos monitoring must be undertaken by a suitably qualified environmental consultant. Daily asbestos air monitoring results should be made available 24hr after collection and notification of the results made available at the site lunch shed.	<p>24/4/19 CCTV image &amp; 16/4/19 site photos.</p> <p>DECC Asbestos Management Removal Plan, Alexandria Park Community School, Rev1 (AMP)</p> <p>Richard Crookes Constructions Hazardous Materials Management Plan Alexandria Park Community School</p>	<p>Monitoring being managed by Coffeys Hygienist.</p> <p>Monitoring occurring daily. A single hit of fibres triggered a review of works and investigation (consistent with SafeWork Code of Practice). Analysis of sample showed the detection was not asbestos.</p> <p>Results were available.</p>	Compliant



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p>Buckland Street, Alexandria NSW 2015, 3 April 2019 (HMMP)</p> <p>Asbestos air monitoring results 17/4/19 – 03/06/19</p> <p>Air quality monitoring detection &gt;0.01 &lt;0.02fml investigation 25/5/19 (analysis later showed not asbestos).</p>		
<b>Construction Traffic and Pedestrian Management Plan (CoC B22)</b>				
c) vi) Pedestrians and cyclists	<p>Public access to footpaths, the bus bay, school entry points, and surrounding roads will be maintained at all times.</p> <p>For all areas surrounding the project site, where temporary impacts on public access are unavoidable, Richard Crookes Constructions will provide appropriate notice, communications, barriers, and traffic management to ensure safe alternative access arrangements.</p>	<p>Interview with auditees</p> <p>Site inspection 04/06/19</p>	Access is being maintained. No works have occurred beyond project boundary.	Compliant
d) ii) and iii) Heavy vehicle ingress and egress routes	Access to and egress from the site during phase 1 will be from Belmont Street.	Site inspection 04/06/19	Belmont Street is the access and egress for Stage 1	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	 <p>Phase 1, Ingress Route 1</p>			
f) TCP monitoring and reporting	<ul style="list-style-type: none"> <li>The traffic control plan will be numbered and a register maintained as a part of the CTMP;</li> <li>All traffic control devices and traffic control arrangements will be inspected daily to ensure the adequacy of such devices and arrangements as per the TCWS Manual;</li> </ul>	<p>Appendix D of the CTPMSP</p> <p>Traffic controller authorisation – 0040529982</p>	No long term traffic control arrangements so far during works. Traffic control arrangements are temporary signage and controllers during movements only.	Compliant
<b>Construction Noise and Vibration Management Plan (CoC B23)</b>				
10.1	<p>The following respite periods are to be adopted:</p> <ul style="list-style-type: none"> <li>0730 – 0800 Monday to Friday</li> <li>1200 – 1300 Monday to Friday</li> </ul>	<p>APCS Site Induction.</p> <p>Example Site Induction Record.</p>	<p>The Project team indicated that they do a delayed start and break at lunch.</p> <p>Refer response to CoC C8 with respect to further</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Interview with auditees	respite hours for high noise impact activities.	
10.2	<p>It is recommended that surrounding receivers are consulted on the process of demolition. Management processes will include:</p> <ul style="list-style-type: none"> <li>• Substituting rock breaking during demolition for alternative measures such as sawing and lifting slab pieces entailing</li> <li>• Making saw cuts to break up slab</li> <li>• Using muncher or pulveriser to break up slab pieces, where practically feasible.</li> </ul>	<p>Induction</p> <p>CNVMSP</p> <p>Noise monitoring results report May 2019</p> <p>Notice from RCC to DECC (31/05/19) regarding noise monitoring results and mitigation measures to be put in place.</p> <p>DECC SWMS 14/05/19</p> <p>Site inspection 04/06/19</p>	<p>The Project has demonstrated that all reasonable and feasible steps are being undertaken to manage noise</p> <p>Training of personnel on ways to reduce noise impact (respite periods, choice of plant etc) as communicated via directions, induction and TBT has occurred.</p> <p>The use of hammers has been avoided, with demolition of concrete instead occurring via cutting and pulverising. Respite periods are being applied.</p> <p>The site is being set up so that site sheds will provide screening on the western boundary (the layout of the site does not allow for this on the southern boundary).</p> <p>Communication with the school is ongoing.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			Monitoring has been undertaken, with results and response occurring.  Refer response to CoC C15.	
10.3	Excavators should not be operated during the nominated respite periods above (referring to section 10.1).	APCS Site Induction.  Example Site Induction Record.  Interview with auditees	The Project team indicated that they do a delayed start and break at lunch.  Refer response to CoC C8 with respect to further respite hours for high noise impact activities.	Compliant
10.4	Attended noise monitoring should be undertaken from time to time.	Noise monitoring results report May 2019	Monitoring has been undertaken, with results and response occurring.  RCC also conduct noise monitoring spot checks to help inform the acoustic consultant	Compliant
<b>Construction Waste Management Plan (CoC B24) (including Asbestos Management Plan and Hazardous Materials Management Plan)</b>				
CoC B24 a)	detail the quantities of each waste type generated during construction and the proposed reuse , recycling and disposal locations;	DECC waste register	The DECC waste register details the information specified in this commitment.  The majority of wastes are pre-classified as building and demolition waste (GSW), asbestos waste. These are being recorded in the waste register which identifies the material type, volume, load date,	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			tip site (all licenced waste facilities – no development sites attracting s143 cert). Hazardous materials are all going to SUEZ Kemps Creek. 4 x loads of asbestos and 6 x loads of SMF have been sent to date. Tip docket dates and volumes match the waste register.	
AMP Section 5 – General Asbestos Removal Process	Notification: Legislation requires notification to the relevant state regulator in writing prior to asbestos removal. 5 days notices for asbestos removal 24hrs notice for less than 10m2 of bonded asbestos Within 24hrs of an unexpected find	SafeWork notice for removal of asbestos (friable and non-friable) 16/04/19 – 02/05/22	ASP (asbestos removal licence 210968) registered removal with SafeWork.	Compliant
	Environmental management: The removal of ACM from a construction site is subject to: <ul style="list-style-type: none"> <li>Transport and final disposal will be conducted in a manner, which prevents the release of fibres.</li> <li>Waste being disposed of at an approved waste disposal facility, under a permit from the relevant local authority and/or EPA.</li> <li>Identifying that the transport of such waste is subject to the Australian Dangerous Goods Code.</li> <li>Noting that the transport of non-domestic waste in quantities of more than 250kg in a load is an Environmentally Relevant Activity and requires that the transport vehicle be licensed by a regulatory authority (i.e. EPA).</li> <li>Ensuring that subcontractor completing the works, provides verification to DECC (by return receipt of waste disposal receipt) that the material has been disposed of at an approved waste disposal facility</li> </ul>	DECC waste register  4 x Transport Certificates for liquid waste (solvents, acids, bases, paints)  EPA Online Waste Tracking Tool registration (disposal to EPL 20696).  Tip dockets 16/05/19, 29/04/19  EPA Consignment Authorisation 29/04/19	The majority of wastes are pre-classified as building and demolition waste (GSW), asbestos waste. These are being recorded in the waste register which identifies the material type, volume, load date, tip site (all licenced waste facilities – no development sites attracting s143 cert). Hazardous materials are all going to SUEZ Kemps Creek. 4 x loads of asbestos and 6 x loads of SMF have been sent to date. Tip docket dates and volumes match the waste register.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			<p>The Project is using the EPA online Waste Tracking Tool for disposal of hazardous and liquid wastes. This requires hold and release by the EPA system and provides a report that can be used to verify appropriate disposal.</p> <p>Payment to waste transporter is only made on dockets after verification.</p>	
	<p>Exclusion Zone: Prior to set up of any exclusion zones and commencement of asbestos removal works, an assessment of air conditioning units and/or other air intakes services of adjacent buildings will be undertaken to determine if filters may be required to be installed. Where total enclosure of the removal area is not practicable, an exclusion area of at least 10 metres around the work area must be implemented.</p> <ul style="list-style-type: none"> <li>The boundary of the exclusion area should be defined by barrier, rope or rails.</li> <li>Signage, indicating that the area is an asbestos removal area, must be erected.</li> </ul> <p>Note: Friable asbestos removal requires a solid barricade to be used.</p>	<p>Site inspection 04/06/19</p> <p>ASP (Lic 210968) Asbestos Removal Control Plan</p> <p>Interview with auditees</p> <p>Photos of exclusion zone tent 6/5/19.</p>	<p>All removal has &gt;10m exclusion . Internal removals have been conducted under sealed conditions (windows and doors sealed prior to internal removal).</p> <p>Friable asbestos was identified within gaskets. For this material the gasket housing was opened and the material bagged in place.</p>	Compliant
AMP Section 7 – Air monitoring regime	<p>Daily asbestos air monitoring will be conducted by others for the Alexandria Park Community School demolition project during all asbestos removal works until a final clearance inspection and report is issued prior to structural demolition works.</p> <p>All asbestos air monitoring results will be kept and updated in an air monitoring register, as well as on site, and to be issued on a weekly or biweekly basis to the Client.</p>	<p>Asbestos air monitoring results 17/4/19 – 03/06/19</p>	<p>Monitoring occurring daily and reports available to workforce</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	Air monitoring are required be installed on asbestos removal, exclusion zone, boundaries as a minimum. Air monitors may also be installed on site (perimeter) boundaries when asbestos removal works are in progress.			
HMMP 15.1	<p>Lead containing dust was identified throughout Alexandria Park Community School, see Appendix B Asbestos and Hazardous Materials Register.</p> <ul style="list-style-type: none"> <li>Confirmed lead containing dust should be removed prior to demolition works in accordance with AS 4361.2- 2017 Guide to Lead Paint Management, Part 2: Residential and Commercial Buildings.</li> <li>If any activities are likely to involve disturbance of dust within ceilings where access was unable to be gained, these works should be undertaken with caution in accordance with AS 4361.2- 2017 Guide to Lead Paint Management, Part 2: Residential and Commercial Buildings.</li> <li>Any work processes involving lead-containing dust must be undertaken in a manner to ensure that no worker is exposed to lead at concentrations above occupational exposure standard (OES) of 0.15mg/m<sup>3</sup> over an eight-hour day. Furthermore, the levels should not exceed 0.03mg/m<sup>3</sup> at the boundary of the regulated area, i.e. boundary of area surrounding a lead removal worksite, where it can be reasonably expected not to exceed the OES.</li> <li>Lead-containing dust removal works should include the use of High Efficiency Particulate Air (HEPA) filtered vacuum cleaners and wet wiping techniques by a licensed contractor under controlled lead-containing dust conditions.</li> </ul>	<p>DECC waste register</p> <p>Working hazmat register 31/5/19, 17/5/19, 15/5/19, 6/5/19, 5/5/19</p>	<p>The lead dust was identified in ducting. The materials was removed during May. The working hazmat register shows identification and removal of hazardous materials.</p> <p>The waste register shows offsite disposal.</p> <p>Refer also response to CoC C33</p>	Compliant
<b>Construction Soil and Water Management Plan (CoC B25)</b>				
2.1.b	<p>Any temporary sediment basins must be constructed and in service prior to the start of bulk excavation and earthworks, where disturbed earthworks area exceeds 2,500 m<sup>2</sup> at any one time.</p> <p>A temporary sediment basin suitable for 149 m<sup>3</sup> of storage and minimum 0.6m depth will be required for stage 1 construction, where more than 7,000 m<sup>2</sup> of area is anticipated to be disturbed. This basin is to remain until the disturbed area has had slab construction commence or stabilised. SCP</p>	<p>Site inspection 04/06/19</p> <p>CSWMSP Appendix A ESCP</p> <p>Explanatory note from author, CSWMSP sediment basin</p>	<p>No basins were required on the Project during the audit period (slab still intact – limited ground disturbance).</p>	Not triggered.

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	Consulting can provide advice on most suitable location when final works schedule has been established	requirements, 14/6/19.		
3	<p>A regular site maintenance program shall be established for the site based upon:</p> <ul style="list-style-type: none"> <li>Daily site walk-over by site foreman/manager to ensure adequate condition of erosion control measures;</li> <li>A weekly site audit of erosion control measures during periods of dry weather; and</li> <li>A site audit of all erosion control measures following a rainfall event.</li> </ul>	<p>RCC inspection reports 03/06/19, 29/05/19, 22/05/19, 10/05/19, 30/04/19, 17/04/19, 10/04/19</p> <p>DECC daily environmental inspection checklists 24/04/19 – 03/06/19.</p>	The inspections carried out include checks of erosion and sediment controls and include pre- and post-rainfall checks.	Compliant



## **Appendix C.**      **Planning Secretary agreement of Independent Auditors**



## Planning & Environment

Department of Education  
ATTN: Mr Robert Crestani  
Project Director, Infrastructure Projects  
Level 8, 259 George Street,  
Sydney, NSW 2000

Contact: Khalid Abubaker  
Phone: 02 8572 1096  
Email: [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Dear Mr Crestani

**Alexandria Park Community School (SSD 8373)  
Condition C38**

Reference is made to a submission, dated 5 April 2019, seeking the agreement of the Secretary of the Department of Planning and Environment (the Department) of a suitability of qualified, experienced and independent audit team to undertake independent audits of the Alexandria Park Community School (SSD 8373) ("Project").

In accordance with Schedule 2, Part C, Condition C38 and the *Independent Audit Post Approvals Requirements* (Department 2018), the Secretary has agreed to the following audit team:

- Steve Fermio; and
- Derek Low.

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* (Department 2018). Failure to meet these requirements will require revision and resubmission.

If you have any questions, please contact Khalid Abubaker on the details listed above.

Yours sincerely

01/05/2019

Kate Moore

**A/ Principal Compliance Officer (Social Infrastructure)**

As nominee of the Secretary

## **Appendix D. Consultation records**

## Derek Low

---

**From:** Derek Low  
**Sent:** Tuesday, 21 May 2019 10:37 AM  
**To:** council@cityofsydney.nsw.gov.au  
**Subject:** Independent Audit of Alexandria Park Community School Redevelopment (SSD 8373)

Hi there.

I am one of the Independent Auditors on the Alexandria Park Community School Redevelopment (SSD 8373).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8373 Sch2 3 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

[http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=8373](http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8373)

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf>

The audit is scheduled to occur in early June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the City of Sydney on the scope of the audit. I understand the City of Sydney provided advice during the assessment phase with regards to access, design, flooding, noise, contamination and biodiversity. These were considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Consent along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

In providing input to the scope, I kindly request City of Sydney confirm if it any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. I look forward to hearing from you.

Derek Low

Principal Environmental Consultant



E: [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au)

P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)



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## Derek Low

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**From:** City of Sydney <council@cityofsydney.nsw.gov.au>  
**Sent:** Tuesday, 21 May 2019 10:37 AM  
**To:** Derek Low  
**Subject:** Automatic reply: Independent Audit of Alexandria Park Community School Redevelopment (SSD 8373)

Thank you for contacting the City of Sydney.

We aim to respond to enquiries within 10 working days, however response times may vary depending on the nature of the request.

If the matter is causing an immediate risk to public health and safety please call us on 9265 9333.

---

456 Kent Street  
GPO Box 1591  
Sydney NSW 2001  
Telephone: 02 9265 9333  
[council@cityofsydney.nsw.gov.au](mailto:council@cityofsydney.nsw.gov.au)  
[cityofsydney.nsw.gov.au](http://cityofsydney.nsw.gov.au)

Did you know that you can now report all issues and requests for service including parking, waste, graffiti and household collections online? Simply visit this [link](#) to log your request.

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## Derek Low

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**From:** Derek Low  
**Sent:** Tuesday, 21 May 2019 10:20 AM  
**To:** compliance@planning.nsw.gov.au  
**Subject:** SSD 8373 Sch2 3 Condition C41 - Independent Audit - Attn: Kate Moore

Hi Kate.

As per voicemail. I am currently preparing to undertake the independent audit on the Alexandria Park Community School Redevelopment in accordance with SSD 8373 Sch2 3 Condition C41.

The on-site component of the audit is scheduled to occur in early June 2019.

In accordance with Section 3.2 of the Department's Independent Audits Post Approval Requirements (2018), I am consulting with the Department on the scope of the audit.

Can you please advise on any specific matters the Department would like included in the audit?

I look forward to hearing back from you.

Any questions please let me know.

**Derek Low**

Principal Environmental Consultant



E: [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au)

P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)



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## Derek Low

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**From:** DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>  
**Sent:** Tuesday, 21 May 2019 10:21 AM  
**To:** Derek Low  
**Subject:** Automatic Response

Thank you for contacting the NSW Department of Planning and Environment's Compliance Team. We have received your email which will be forwarded to the appropriate officer for attention.

If your matter relates to a complaint, we will contact you within 14 days seeking further information or to provide you with the status/outcome of our investigation.

Kind regards,

Compliance Team  
NSW Department of Planning and Environment  
320 Pitt Street | GPO Box 39 | Sydney NSW 2001  
T 1300 305 695  
E [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)



## Derek Low

---

**From:** Derek Low  
**Sent:** Tuesday, 21 May 2019 10:47 AM  
**To:** info@epa.nsw.gov.au  
**Subject:** Independent Audit of Alexandria Park Community School Redevelopment (SSD 8373)

Hi there.

I am one of the DPE approved Independent Auditors on the Alexandria Park Community School Redevelopment (SSD 8373).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8373 Sch2 3 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

[http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=8373](http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8373)

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf>

The audit is scheduled to occur in early June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the EPA on the scope of the audit. I understand the EPA provided advice during the assessment phase with regards to contamination and associated risks. These were considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Consent along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. I note that it will not look at matters being examined by the EPA accredited Contaminated Site Auditor, as they are best placed to consider and advise on issues falling under their remit.

In providing input to the scope, we kindly request EPA confirm if it any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. I look forward to hearing from you.

Derek Low  
Principal Environmental Consultant



E: [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au)


P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)



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## Derek Low

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**From:** Environment Line <info@environment.nsw.gov.au>  
**Sent:** Tuesday, 21 May 2019 10:49 AM  
**To:** Derek Low  
**Subject:** Thank you for your email. Your Reference Id is 00852029 (ref:\_00D7F6iTix.\_5007FIN9ih:ref)



---

Thank you for your enquiry. The Office of Environment and Heritage (OEH) and the NSW Environment Protection Authority (EPA) will respond to simple requests and enquiries within 5 working days. For enquiries or requests that are more involved or technical, a longer response time may be necessary. If you have not already visited our websites and wish to do so, please go to [www.environment.nsw.gov.au](http://www.environment.nsw.gov.au) or [www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

**If you are emailing to report an urgent pollution incident, please call 131 555 (press option 1).**

Please note that in sending us an email, we will record your email address for the purpose of responding to your enquiry. If your email requires a transaction or another more detailed service, we may record the personal details you supply, or request further details from you in order to provide the service you have requested. Where this is not necessary you can request your details remain anonymous or confidential. Details of our Privacy information can be found on the website at [www.environment.nsw.gov.au/whoweare/privacy.htm](http://www.environment.nsw.gov.au/whoweare/privacy.htm).

When sending further emails about this topic (Independent Audit of Alexandria Park Community School Redevelopment (SSD 8373)), please ensure the following extended Reference Id appears anywhere in the email subject or body:

ref:\_00D7F6iTix.\_5007FIN9ih:ref

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## Derek Low

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**From:** Derek Low  
**Sent:** Tuesday, 21 May 2019 10:34 AM  
**To:** info@environment.nsw.gov.au; HERITAGEMailbox@environment.nsw.gov.au  
**Subject:** Independent Audit of Alexandria Park Community School Redevelopment (SSD 8373)

Hi there.

I am one of the Independent Auditors on the Alexandria Park Community School Redevelopment (SSD 8373).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8373 Sch2 3 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

[http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=8373](http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8373)

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf>

The audit is scheduled to occur in early June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the OEH on the scope of the audit. I understand the OEH provided advice during the assessment phase with regards to biodiversity, Aboriginal cultural heritage and flooding. These were considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Consent along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

In providing input to the scope, we kindly request OEH confirm if it any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. I look forward to hearing from you.

Derek Low

Principal Environmental Consultant



E: [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au)

P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)



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## Derek Low

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**From:** OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>  
**Sent:** Tuesday, 21 May 2019 10:35 AM  
**To:** Derek Low  
**Subject:** Automated Response  
**Attachments:** image001.png

Thank you for your email to the Heritage Division of the Office of Environment and Heritage. We will respond to your request as soon as possible.

If you have submitted an application under the *Heritage Act 1977*, it will be checked for completeness and allocated to the appropriate assessment team. An officer will contact you if any additional information is required. Completeness checks are generally completed within 7 days.

The Heritage Division aims to process applications within the timeframes below, which will commence once an application is considered complete.

Application Type	Timeframe
Development application referrals	28 days
Integrated Development Applications (IDAs)	21 days (following receipt of submissions from local council, or advice that no submissions were received)
Planning proposals	21 days
Section 57(2) Exemption Notification	14 days
Section 60 / 65A	40 days (or 60 days if advertised)
s4.55 modification (formerly Section 96)	21 days (following receipt of submissions from local council)
Section 139 Exceptions	21 days
Section 140	21 days

If your email relates to Aboriginal cultural heritage, or biodiversity, you will need to forward your email to the Communities and Greater Sydney Delivery Division at [gs.ach@environment.nsw.gov.au](mailto:gs.ach@environment.nsw.gov.au).

Alternatively, the postal address for Aboriginal Cultural Heritage is:

Communities and Greater Sydney Division  
Office of Environment and Heritage  
PO Box 644  
Parramatta NSW 2124

Further information is also available at [www.environment.nsw.gov.au/heritage/](http://www.environment.nsw.gov.au/heritage/).

Sincerely



Office of  
Environment  
& Heritage

Customer Strategies  
Heritage Division

Locked Bag 5020, Parramatta 2124  
T 02 9873 8500

-----  
-----  
This email is intended for the addressee(s) named and may contain confidential and/or privileged information.  
If you are not the intended recipient, please notify the sender and then delete it immediately.  
Any views expressed in this email are those of the individual sender except where the sender expressly and with  
authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

## Derek Low

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**From:** Environment Line <info@environment.nsw.gov.au>  
**Sent:** Tuesday, 21 May 2019 10:35 AM  
**To:** Derek Low  
**Subject:** Thank you for your email. Your Reference Id is 00852022 (ref:\_00D7F6iTix.\_5007FIN9dN:ref)



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Thank you for your enquiry. The Office of Environment and Heritage (OEH) and the NSW Environment Protection Authority (EPA) will respond to simple requests and enquiries within 5 working days. For enquiries or requests that are more involved or technical, a longer response time may be necessary. If you have not already visited our websites and wish to do so, please go to [www.environment.nsw.gov.au](http://www.environment.nsw.gov.au) or [www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

**If you are emailing to report an urgent pollution incident, please call 131 555 (press option 1).**

Please note that in sending us an email, we will record your email address for the purpose of responding to your enquiry. If your email requires a transaction or another more detailed service, we may record the personal details you supply, or request further details from you in order to provide the service you have requested. Where this is not necessary you can request your details remain anonymous or confidential. Details of our Privacy information can be found on the website at [www.environment.nsw.gov.au/whoweare/privacy.htm](http://www.environment.nsw.gov.au/whoweare/privacy.htm).

When sending further emails about this topic (Independent Audit of Alexandria Park Community School Redevelopment (SSD 8373)), please ensure the following extended Reference Id appears anywhere in the email subject or body:

ref:\_00D7F6iTix.\_5007FIN9dN:ref

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## **Appendix E.      Independent Audit Declaration Form(s)**

# Independent Audit Declaration Form

## Independent Audit Declaration Form


Project name	Alexandria Park Community School
Consent Number	8373
Description of Project	Redevelopment and operation of Alexandria Park Community School
Project Address	7 – 11 Park Road, Alexandria, NSW 2015
Proponent	NSW Department of Education
Title of Audit	Independent Audit
Date	09/06/19

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:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2018);
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- 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;
- 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;
- 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;
  - I declared prior to the audit that I had been engaged to prepare the Independent Audit Program
- 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:

- 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
- 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	Derek Low
Signature	
Qualification	Master of Environmental Engineering Management Exemplar Global Auditor Number 114283
Company	WolfPeak Pty Ltd
Company address	Suite 2, Level 10, 189 Kent Street Sydney NSW 2000

# Independent Audit Declaration Form

## Independent Audit Declaration Form

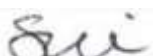
Project name	Alexandria Park Community School
Consent Number	8373
Description of Project	Redevelopment and operation of Alexandria Park Community School
Project Address	7 – 11 Park Road, Alexandria, NSW 2015
Proponent	NSW Department of Education
Title of Audit	Independent Audit
Date	09/06/19

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:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2018);
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- 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;
- 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;
- 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;
  - I declared prior to the audit that I had been engaged to prepare the Independent Audit Program
- 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:

- 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
- 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	Steve Fermio
Signature	
Qualification	Bachelor of Science (Honours) Exemplar Global Auditor Number 110498
Company	WolfPeak Pty Ltd
Company address	Suite 2, Level 10, 189 Kent Street Sydney NSW 2000

## **Appendix F. Site inspection photographs.**



**Photo 1: Belmont Street entry / egress. There were no obstructions to public way, no material tracking and Project signage was installed.**



Photo 2: Erosion and sediment control





Photo 3: Environment notice board



**Photo 4: Noise barrier on boundary with existing school.**



**Photo 5: Material segregation. Note proximity of works to receivers on western (right of shot) and southern (centre) boundaries**



**Photo 6: Site sheds are being installed to provide extra privacy and noise attenuation for properties on western boundary**





**Photo 7: Material segregation and proximity of adjacent receivers**



**Photo 8: Vibration monitoring and drain protection**





**Photo 9: Tree protection on southern boundary**



**Photo 10: Material segregation**



**Photo 11: Hazardous material removal exclusion zone**



**Photo 12: GSW stockpile stabilization**





**Photo 13: Spill kit**



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