

INDEPENDENT AUDIT REPORT


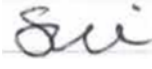
ALEXANDRIA PARK COMMUNITY SCHOOL – SSD 8373

NOVEMBER 2020

Revision History

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CONTENTS

Executive Summary	5
1. Introduction.....	6
1.1 Project overview	6
1.2 Approval requirements.....	7
1.3 The audit team	7
1.4 The audit objectives.....	8
1.5 Audit scope.....	8
2. Audit methodology	10
2.1 Audit process.....	10
2.2 Audit process detail	11
2.2.1 Audit initiation and scope development.....	11
2.2.2 Preparing audit activities	11
2.2.3 Site personnel involvement.....	12
2.2.4 Meetings.....	12
2.2.5 Interviews	13
2.2.6 Site inspection	13
2.2.7 Document review.....	13
2.2.8 Generating audit findings.....	13
2.2.9 Compliance evaluation	13
2.2.10 Evaluation of post approval documentation	14
2.2.11 Completing the audit.....	14
3. Audit findings.....	15
3.1 Approvals and documents audited and evidence sighted	15
3.2 Non-compliances, Observations and Actions.....	15
3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents.....	22
3.4 Summary of notices from agencies.....	22
3.5 Other matters considered relevant by the Auditor or DPIE.....	22
3.5.1 Issues raised by DPIE	22
3.6 Complaints	23

3.7 Incidents	23
3.8 Actual versus predicted impacts	23
4. Conclusions	25
5. Limitations	26
Appendix A – SSD 8373 Conditions of consent.....	27
Appendix B – Planning Secretary agreement of Independent Auditors	63
Appendix C – Consultation records	64
Appendix D – Meeting sign on sheet.....	66
Appendix E – Site inspection photographs	68
Appendix F – Declarations	73

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, State Significant Development (SSD) 8373, was granted on 11 February 2019, 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 Auditor notes that the Project has elected to adopt the 2020 revision of the *Independent Audit Post Approval Requirements* and, therefore, the timing, methodology and reporting requirements specified in that revision have been adopted for this Independent Audit.

This Audit Report presents the findings from the fourth Independent Audit for the construction period, covering the period from 1 June 2020 to 24 November 2020. Savills has been appointed as the client representative on behalf of School Infrastructure NSW. Richard Crookes Construction (RCC) is the principal contractor. Construction works began 29 April 2019. Works undertaken since the previous Independent Audit include completion of structure, fit out and landscaping of Phase 1 (stage 1). Phase 1 commenced operations in term 4 2020. Removal of the pop up school was underway during the on-site component of the audit with construction of Phase 2 scheduled to commence in December 2020.

The overall outcome of the Independent Audit indicated that compliance is being proactively tracked by Savills and RCC. Compliance records were very well organised and available during the Independent Audit. 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.

Detailed findings are presented in Section 3, along with actions to address each of the findings. The findings are summarized as follows:

- There were 108 CoCs assessed. A further 46 CoCs relate to requirements to be fulfilled prior to commencement of operations or during operations and were not triggered during the audit period.
- There were four new non-compliances identified against the CoCs. These relate to traffic movements, maintaining the Complaints Register on the project website, and submission of documentation.
- There were three new observations made in relation to the CoCs, relating to ongoing operational audits of Phase 1 of the Project, consultation and content of documentation.
- All actions from the May 2020 Independent Audit had been addressed and are considered closed.

The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the Independent Audit.

1. INTRODUCTION

1.1 Project overview

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, 2.75 km 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; and
- Operation of the upgraded school.

During 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.

An application to modify SSD 8373 was submitted on 3 April 2020 (Modification 1). The application sought to amend the construction phasing which will enable the staged construction and use of the first three levels of the high school component, and a delayed final construction phase of level 4, along with minor design changes. Modification 1 was approved 21 July 2020.

A second application to modify SSD 8373 was submitted on 2 June 2020 (Modification 2). The application seeks to expand the sports field over Park Road. This application is currently being assessed by the Department.

Savills has been appointed as the client representative on behalf of Schools Infrastructure NSW. Richard Crookes Construction (RCC) is the principal contractor. Construction works began 29 April 2019. Works undertaken since the previous Independent Audit include completion of structure, fit out and landscaping of Phase 1 (stage 1). Phase 1 commenced operations in term 4 2020. Removal of the pop up school was underway during the on-site component of the audit with construction of Phase 2 scheduled to commence in December 2020.

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 of Planning Industry and Environment (the Department) document entitled *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): Master 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 of approval is presented in Appendix B.

1.4 The audit objectives

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 Auditor notes that the Project has elected to adopt the 2020 revision of the IAPAR and, therefore, the timing, methodology and reporting requirements specified in that revision have been adopted for this IA.

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 Audit scope

This IA relates to the Project works from 1 June 2020 to 24 November 2020.

The scope of the IA, as per the 2020 revision of the IAPAR, comprises:

- an assessment of compliance with:
 - all conditions of consent applicable to the phase of the development that is being audited
 - all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and
 - all environmental licences and approvals applicable to the development excluding environment protection licences issued under the Protection of the Environment Operations Act 1997.
- a review 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

- 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; and
- feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any)
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

2. AUDIT METHODOLOGY

2.1 Audit process

The Independent Audit was conducted in a manner consistent with AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems and the methodology set out in the Department’s IAPAR. An overview of the audit activities, as specified in AS/NZS ISO 19011, is presented in Figure 2.

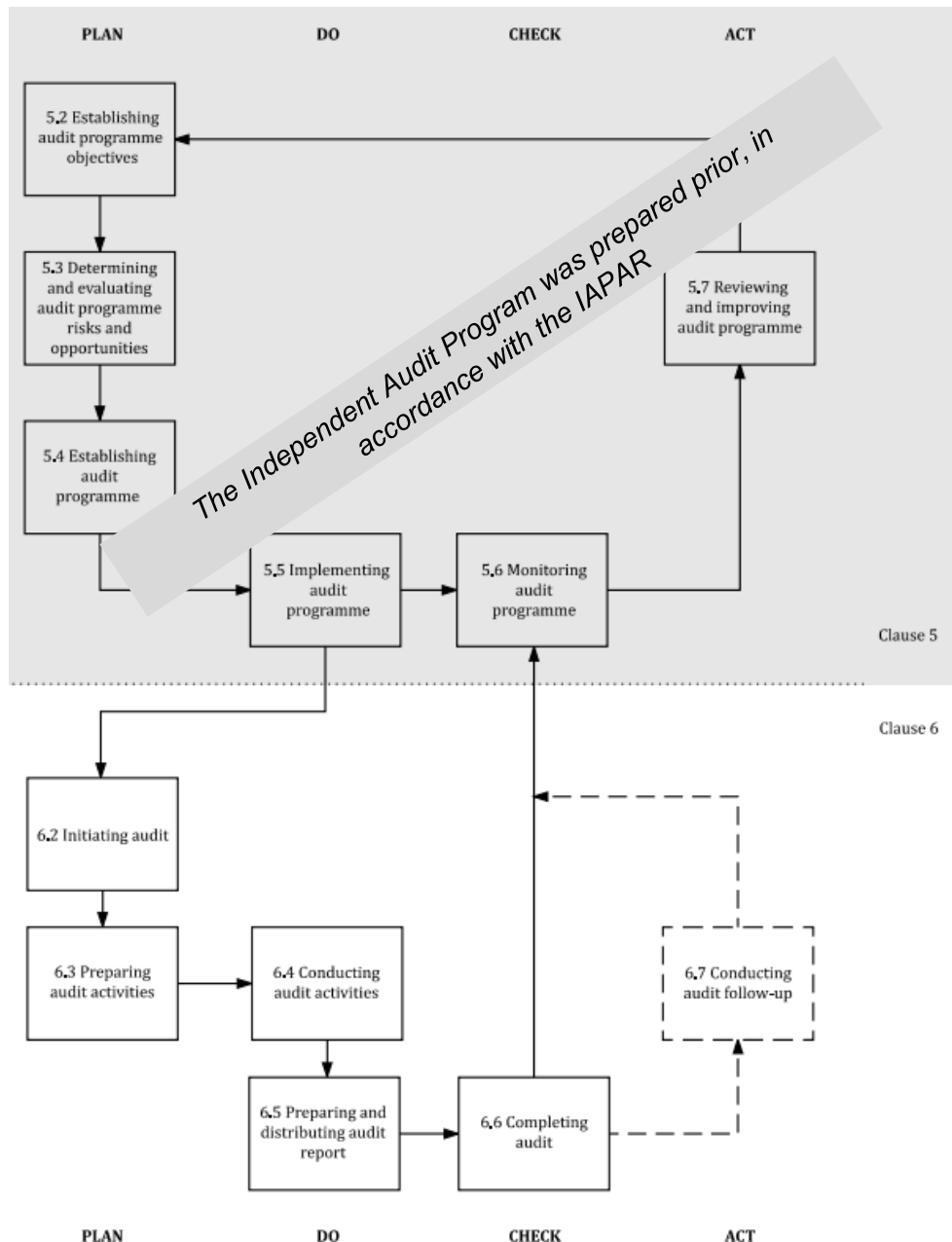


Figure 1 Audit activities overview (modified from AS/NZS ISO 19011). Subclause numbering refers to the relevant subclauses in the Standard.

2.2 Audit process detail

2.2.1 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 4 November 2020 WolfPeak consulted with the Department to obtain their input into the scope of the IA and confirmation on whether other stakeholders should be consulted, as per Section 3.2 of the IAPAR. The consultation records are presented in Appendix C.

A summary of the key issues and areas of focus raised by the stakeholders is presented in Table 1.

Table 1 Key issues and areas of focus raised during consultation

Stakeholder	Issues and Focus	How Addressed
Department of Planning, Industry, and Environment	<p>The IA should focus on</p> <ul style="list-style-type: none"> • Out of hours works • Compliance with archaeological requirements • Provision of play space per student was an assessment issue, however revised staging and amended plans were approved in a modification. As such, please also check if/how the revised staging / design has been incorporated into project management. 	Included in the scope. Refer Section 3.5 below.
	Please consult with any parties or agencies required under the Approval.	The Consent does not require consultation with any other stakeholders on the scope of the audit.

2.2.2 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 Independent Audit.

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
- *Development Consent SSD 8373*, 11 February 2019 (the Consent)
- *Community Communication Strategy Alexandria Park Community School*, April 2019 (CCS)
- *Alexandria Park Community School No. 1161 Construction Environmental Management Plan*, Richard Crookes Constructions, Rev 1, 14 March 2019 (CEMP)
- *Construction Traffic and Pedestrian Management Plan, Alexandria Park Community School K-12*, Sydney Traffic Control, [no date or revision] (CTPMSP)
- *Alexandria Park Community School Construction Noise Vibration Management Plan*, Acoustic Logic, 22 January 2020 (CNVMSP)
- *Construction Soil and Water Management Plan*, Rev F, SCP Engineers and Development Consultants, 26 July 2019 (CSWMSP)
- *Construction Waste Management Sub-Plan (CWMSP)*, Richard Crooks Construction, 10 November 2020
- *Richard Crookes Constructions Hazardous Materials Management Plan Alexandria Park Community School Buckland Street*, Alexandria NSW 2015, Coffey, 3 April 2019
- *Alexandria Park Community School- Complaints Register*, last updated 16 November 2020.

An audit checklist was reviewed and prepared comprising all conditions from Schedule 2 of SSD 8373.

2.2.3 Site personnel involvement

The on-site audit activities took place on 11 November 2020. The following personnel took part in the audit:

- Nicholas Clay – Senior Project Manager (Savills Project Management)
- Trent Scrivener – Senior Project Engineer (RCC)
- Sheron Musengi – Project Engineer (RCC); and
- Derek Low – Auditor (WolfPeak).

2.2.4 Meetings

Opening and closing meetings were held with the Auditor and Project personnel. The attendance sheet can be found in Appendix D.

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

2.2.5 Interviews

The Auditor conducted interviews during the site inspection with key personnel involved in Project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development. All other communication was conducted remotely, which included detailed request for information and auditee responses to the request.

2.2.6 Site inspection

The on-site audit activities took place on 11 November 2020. The on-site audit activities included an inspection of the construction site and work activities. Photos are presented in Appendix E.

2.2.7 Document review

The Independent Audit 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 within Appendices A and B.

2.2.8 Generating audit findings

Independent Audit 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.

2.2.9 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.

2.2.10 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.
- 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 was determined on the basis of whether:

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

2.2.11 Completing the audit

The Independent Audit 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 that relate to compliance:

- CEMP
- CTPMSP
- CNVMSP
- CWMSP; and
- CSWMP.

The evidence sighted against each requirement is detailed within Appendix A.

3.2 Non-compliances, Observations and Actions

This Section presents the non-compliances and observations from the third IA, along with the status of findings that remained open from the second IA. Actions in response to each of the findings are also presented. Detailed findings against each CoC are presented in Appendix A. In summary:

- There were 108 CoCs assessed. A further 46 CoCs relate to requirements to be fulfilled prior to commencement of operations or during operations and were not triggered during the audit period.
- There were four new non-compliances identified against the CoCs. These relate to traffic movements, maintaining the Complaints Register on the project website, and submission of documentation.
- There were three new observations made in relation to the CoCs, relating to ongoing operational audits of Phase 1 of the Project, consultation and content of documentation.
- All actions from the May 2020 IA had been addressed and are considered closed.

Table 2 Audit findings and actions

Item	Ref.	Type	Details of item	Proposed or completed action	By whom and by when	Status
ACTIONS OPEN FROM THE MAY 2020 AUDIT						
1	CoC B24	Non-compliance	<p>CoC B24 requires that a Construction Waste Management Sub-Plan (CWMSP) be prepared and must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; 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. <p>The approved CWMSP prepared for the project is a document prepared by the demolition and earthworks contractor (DECC) and does not address any works other than demolition and earthworks. Whilst the project has demonstrated that wastes are being tracked, recycled and disposed of correctly (as required by this condition and CoCs C32, C33 and C36), RCC's subsequent CWMSP had not been finalised or approved.</p>	A CWMSP is to be approved by the Certifier.	RCC 31/07/20	CLOSED The updated CWMSP has been approved by the Certifier and submitted to the Department.
2	CoC B36	Non-compliance	CoC B36 requires that Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018). The Project must also make each Compliance Report publicly available 60 days after submitting it to the Department and notify the	Ensure future Compliance Reports are submitted within the timeframes specified by the	SINSW Prior to next reporting round.	CLOSED The Project has adopted the 2020 Compliance

COMMERCIAL IN CONFIDENCE

Item	Ref.	Type	Details of item	Proposed or completed action	By whom and by when	Status
			<p>Department and the Certifying Authority in writing at least seven days before this is done.</p> <p>Evidence indicates that the Compliance Report submitted on 11/11/19 was not published until after 21/01/20, which is beyond the 60 days required by this condition. There is no evidence that indicates that the Certifier was notified of the publication.</p> <p>Evidence indicates that the Construction Compliance Report scheduled for submission on 11/05/20 was not submitted until 19/05/20.</p>	Compliance Monitoring and Reporting Program, that all parties are notified of publication, and that publication occurs within 60 days of submission.		Reporting Post Approval Requirements and, therefore, reporting during the construction period is no longer required.
3	CoC C6 and C16	Non-compliance	<p>CoC C6 states that construction, including the delivery of materials to and from the site, may only be carried out between the following hours:</p> <ul style="list-style-type: none"> (a) between 7 am and 6 pm, Mondays to Fridays inclusive; and (b) between 7:30 am and 3:30 pm, Saturdays. <p>No work may be carried out on Sundays or public holidays.</p> <p>CoC C7 sets out the terms on which works can be conducted outside of the hours specified in CoC C6.</p> <p>CoC C16 states that the Project 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 CoC C6.</p> <p>Construction works continued beyond 6pm on 28/11/19 due to a delay in concrete supplies impacting a concrete pour. Construction works commenced prior to 7 am 27/03/20 to facilitate a concrete pour. These works were not permissible under the out of hours works terms set out in</p>	<p>Provide regular training to project personnel and suppliers on permissible work hours.</p> <p>Identify future works that may extend beyond permissible work hours, and comply with CoC C7 where applicable.</p>	RCC 31/07/20	<p>CLOSED</p> <p>The Project provided evidence that permissible hours of work have been communicated to the work force. Refer to response to CoC C6 for the current audit period in Appendix A.</p>

Item	Ref.	Type	Details of item	Proposed or completed action	By whom and by when	Status
			<p>CoC C7. Both non-compliances were reported to the Department in accordance with CoC C45.</p> <p>The complaint register indicates that two complaints about noise outside of approved hours were verified to be as a result of construction works occurring out of hours. The works were not permissible under the out of hours works terms set out in CoC C7. The Auditees confirmed as part of the audit that the out of hours works were non-compliant with CoC C6, but had not been reported in accordance with CoC C45.</p>			
NOVEMBER 2020 AUDIT FINDINGS						
4	CoC A21`	Non-compliance	<p>CoC A21 requires that the Project must:</p> <p>(a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <p>viii) a complaints register, updated monthly;</p> <p>The Complaints Register sighted on the day of the audit had not been updated since late September 2020.</p>	The Complaints Register was updated on the website	NA	CLOSED
5	CoC C9	Non-compliance	<p>CoC C9 requires that the Project must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).</p> <p>Section 2.5 of the CTPMSP states that the largest vehicle expected and allowed to site is a Heavy Rigid Vehicles (HRV) which will be 12.5 metres long. 2 x semi-trailers that were longer than 12.5 metres were observed entering the site on the day of the site inspection. Also, Section 3.2 of the CTPMSP states that no demolition or construction vehicles will enter or exit the site from park Road / Power</p>	<p>Prohibit any vehicles over HRV 12.5m long from the Project.</p> <p>Prohibit the arrival / exit of heavy vehicles as set out in Section 3.2 of the CTPMSP.</p> <p>Recommunicate these requirements to</p>	<p>RCC</p> <p>31/12/20</p>	OPEN

Item	Ref.	Type	Details of item	Proposed or completed action	By whom and by when	Status
			Avenue between the times of 08:30 and 09:30 am. The two movements above occurred at approximately 08:30am.	the workforce and transport contractors.		
6	CoC C43	Observation	<p>CoC C43 states that 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.</p> <p>The Auditor considers there to be sufficient challenges and limited value in undertaking operational audits on Phase 1 of the school as part of the current audit program. This is due to many requirements being discharged to the Department of Education (in many cases the Principal of the school), rather than SINSW.</p>	Consider raising a request to the Department to exclude the audit of the operation of Phase 1 of the school.	<p>Savills / SINSW</p> <p>Prior to next audit.</p>	OPEN
7	CoC C40	Non-compliance	<p>CoC C40 requires that within three months of:</p> <ul style="list-style-type: none"> (a) the submission of a compliance report under condition B36; (b) the submission of an incident report under condition C44; (c) the submission of an Independent Audit under condition C41; (d) the issue of a direction of the Planning Secretary under condition A2 which requires a review, <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>There is no evidence to demonstrate that the Department was notified of the review undertaken in June 2020.</p>	Notify each of the stakeholders identified in this condition of the reviews of the strategies, plans and programs.	<p>Savills / SINSW</p> <p>Within 3 months of the next triggering event (defined under a) – d) of this condition.</p>	OPEN

Item	Ref.	Type	Details of item	Proposed or completed action	By whom and by when	Status
8	CoC D6	Observation	<p>CoC D6 requires that 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.</p> <p>Council is not the authority of the infrastructure under the Water Management Act, Sydney Water is. As such the compliance certificate was not obtained from Council.</p>	The Sydney Water compliance certificate was issued in July, prior to opening.	NA	CLOSED
9	CoC D25	Observation	<p>CoC D25 requires that 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"> (a) detail the type and quantity of waste to be generated during operation of the development; (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); (c) detail the materials to be reused or recycled, either on or off site; and (d) include the Management and Mitigation Measures included in RtS <p>The Operational Waste Management Plan identifies collection (i.e.: commercial waste transporter collection), not disposal at destination. The Operational Waste Management Plan identifies general classifications from typical commercial facilities or that defined by commercial waste operators rather than any specific classifications from the Waste Classification Guidelines. Whilst not necessarily inconsistent with the relevant legislation and</p>	NA	NA	CLOSED

Item	Ref.	Type	Details of item	Proposed or completed action	By whom and by when	Status
			subordinate guidelines, the Operational Waste Management Plan does not reference the POEO Act, Waste Regulation or Waste Classification Guidelines. The Auditor considers the Operational Waste Management Plan to be fit for purpose in its current form.			
10	CoC D26	Non-compliance	<p>CoC D26 requires that the Project must prepare a Validation Report for the development. The Validation Report must (among other things):</p> <p>(b) be submitted to EPA, the Planning Secretary and the Certifying Authority for information one month after the completion of remediation works</p> <p>The auditees were of the understanding that the Contaminated Sites Auditor submitted the validation report to the EPA. On 14/11/20 the Contaminated Sites Auditor advised the Project that it is the Applicant who has to send the Validation Report to the EPA. The Validation Report was not issued to the EPA until 17/11/20, more than one month after completion of remediation works.</p>	The Validation Report was submitted to the EPA on 17/11/20	NA	CLOSED

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

- CEMP
- CTPMSP
- CNVMSP
- CWMSPP; and
- CSWMSP.

The documents are generally adequate for the works being undertaken.

3.4 Summary of notices from agencies

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

3.5 Other matters considered relevant by the Auditor or DPIE

The Auditor has no additional matters to raise.

3.5.1 Issues raised by DPIE

The Department requested the audit focus on out of hours works, compliance with archaeological requirements, and the provision of play space per student and staging.

3.5.1.1 Out of Hours Works

According to the evidence there have been out of hours works in the audit period. There were several complaints about noise coming from the site during the night-time period. Investigations determined that these either did not relate to the Project, or were associated with fixed operational plant and equipment on the Phase 1 operation of the school (i.e.: not related to construction). Verification of operational plant and equipment noise emissions as per CoC E4 and E5 is pending.

3.5.1.2 Archaeological requirements

The audit period covered the completion of phase 1 of the school and commencement of removal of the pop up school for Phase 2. The audit period did not contain works with the potential to disturb heritage items. The only ground disturbing works were landscaping within areas already subject to disturbance and with no known archaeological potential. No unexpected finds were identified by the Project.

3.5.1.3 Play space per student and staging

The Department stated: *provision of play space per student was an assessment issue, however revised staging and amended plans were approved in a modification. As such, please also check if/how the revised staging / design has been incorporated into project management.* Assessing how this has been factored into project management is somewhat difficult to quantify. Evidence demonstrates the Staging Report is being implemented on the Project. As the Auditor was not able to access the operational parts of the school (due to it operating), verification as to whether Phase 1 play space per student cannot be confirmed. However the Certifier has issued the Crown Completion Certificate for this portion of the Project, and in doing so has confirmed that all design related elements have been delivered.

3.6 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/content/dam/infrastructure/projects/a/alexandria-park-community-school/november-2020/Alexandria_Park_CS_Complaints_Register_November_2020.pdf

A total of 13 complaints were recorded during the period covered by this IA. These related to work hours, noise, and light spill. It is understood these came from several complainants in close proximity to the works. All 13 were considered by the Project to be closed.

3.7 Incidents

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

3.8 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	The approved Project boundary is defined within the stamped plans listed under CoC A2.	The Project footprint is the same as that approved. To note is that a private light vehicle parking area has been established by the Project	Y

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
boundary and any potential off-site impacts		on Park Road. This has been done via a lease with Council.	
Biodiversity	The Project would result in the loss of 69 mature trees and protect those being retained	Tree removal had occurred prior to the audit period 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.	To note is that a private light vehicle parking area has been established by the Project on Park Road. This has been done via a lease with Council. Heavy vehicle movements are minor and using approved gates and routes. Refer to section 3.2 regarding heavy vehicle movements.	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 and are not insubstantial, but appear to be generally consistent with that predicted.	Y
Heritage	Further investigations are required as part of a full ACHA	Investigations for phase 1 works are complete. The Project advise that there were no heritage finds. The Report is pending.	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.	Remediation works are complete. Refer to finding in relation to CoC D26 0 D28.	Y

4. CONCLUSIONS

The overall outcome of the IA indicated that compliance is being proactively tracked by Savills and RCC, with some room for improvement in managing work hours and document distribution.

Compliance records were very well organised and available at the time of the site inspection and interview with Savills and RCC personnel on and following the site visit. 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.

Detailed findings are presented in Section 3, along with actions to address each of the findings. The findings are summarized as follows:

- There were 108 CoCs assessed. A further 46 CoCs relate to requirements to be fulfilled prior to commencement of operations or during operations and were not triggered during the audit period.
- There were four new non-compliances identified against the CoCs. These relate to traffic movements, maintaining the Complaints Register on the project website, and submission of documentation.
- There were three new observations made in relation to the CoCs, relating to ongoing operational audits of Phase 1 of the Project, consultation and content of documentation.
- All actions from the May 2020 IA had been addressed and are considered closed.

The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the IA.

5. 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																																																																																																																
Schedule 2																																																																																																																				
Part A Administrative conditions																																																																																																																				
Obligation to Minimise Harm to the Environment																																																																																																																				
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																																																																																																																
Terms of Consent																																																																																																																				
A2	<div>The development may only be carried out:<div><div>a) in compliance with the conditions of this consent;</div><div>b) in accordance with all written directions of the Planning Secretary;</div><div>c) generally in accordance with the EIS and Response to Submissions;</div><div>d) in accordance with the approved plans in the table below:</div></div><table><tr><th colspan="4">Architectural Drawings prepared by Tanner Kibble Denton Architects</th></tr><tr><th>Dwg No.</th><th>Rev.</th><th>Name of Plan</th><th>Date</th></tr><tr><td>AR.DA. 1001</td><td>P1</td><td>Existing Site Plan</td><td>08.12.17</td></tr><tr><td>AR.DA. 1101</td><td>P2 A</td><td>Proposed Site Plan – Completed Project</td><td>20.04.18 12.03.20</td></tr><tr><td>AR.DA. 1102</td><td>A</td><td>Proposed Site Plan – Phase 2 Completion</td><td>12.03.2020</td></tr><tr><td>AR.DA. 1201</td><td>P2 A</td><td>Existing and Proposed Site Plans</td><td>20.04.18 12.03.20</td></tr><tr><td>AR.DA. 1202</td><td>P2 A</td><td>Phase 1 – Construction Extent</td><td>20.04.18 12.03.20</td></tr><tr><td>AR.DA. 1203</td><td>P2 A</td><td>Phase 2 – Construction Extent</td><td>20.04.18 12.03.20</td></tr><tr><td>AR.DA. 1204</td><td>A</td><td>Phase 3 – Construction Extent</td><td>12.03.20</td></tr><tr><td>AR.DA. 1205</td><td>A</td><td>Existing and Proposed Site Plans - Phase 2 Completion</td><td>12.03.20</td></tr><tr><td>AR.DA. 2001</td><td>P5</td><td>Campus Plans- Ground and First Floors</td><td>28.11.18</td></tr><tr><td>AR.DA. 2002</td><td>P4</td><td>Campus Plans – Second and Third Floors</td><td>24.04.18</td></tr><tr><td>AR.DA. 2003</td><td>P4 A</td><td>Campus Plans – Fourth Floor and Roof</td><td>29.11.18-12.03.20</td></tr><tr><td>AR.DA. 2004</td><td>A</td><td>Roof Plan - Completed Project</td><td>12.03.20</td></tr><tr><td>AR.DA. 2010</td><td>P2 A</td><td>Key Plan</td><td>20.04.18 12.03.20</td></tr><tr><td>AR.DA. 2011</td><td>P2 A</td><td>Key Plan- Building References</td><td>20.04.18 12.03.20</td></tr><tr><td>AR.DA. 2101</td><td>P3</td><td>Ground Floor Plan – Northern Hubs</td><td>20.04.18</td></tr><tr><td>AR.DA. 2102</td><td>P3</td><td>Ground Floor Plan – Southern Hubs</td><td>20.04.18</td></tr><tr><td>AR.DA. 2201</td><td>P3</td><td>First Floor Plan – Northern Hubs</td><td>20.04.18</td></tr><tr><td>AR.DA. 2202</td><td>P4</td><td>First Floor Plan – Southern Hubs</td><td>24.04.18</td></tr><tr><td>AR.DA. 2301</td><td>P3</td><td>Second Floor Plan – Northern Hubs</td><td>20.04.18</td></tr><tr><td>AR.DA. 2302</td><td>P4</td><td>Second Floor Plan – Southern Hubs</td><td>24.04.18</td></tr><tr><td>AR.DA. 2401</td><td>P3</td><td>Third Floor Plan – Northern Hubs</td><td>20.04.18</td></tr><tr><td>AR.DA. 2402</td><td>P3</td><td>Third Floor Plan- Southern Hubs</td><td>20.04.18</td></tr><tr><td>AR.DA. 2501</td><td>P3 A</td><td>Fourth Floor Plan – Northern Hubs</td><td>20.04.18 12.03.20</td></tr><tr><td>AR.DA. 2504</td><td>A</td><td>Fourth Floor Plan - Level 04 as Temporary Roof</td><td>12.03.20</td></tr><tr><td>AR.DA. 2601</td><td>P2 A</td><td>Roof Plan- Northern Hubs</td><td>20.04.18 12.03.20</td></tr><tr><td>AR.DA. 2602</td><td>P2 A</td><td>Roof Plan- Southern Hubs</td><td>20.04.18 12.03.20</td></tr></table></div>	Architectural Drawings prepared by Tanner Kibble Denton Architects				Dwg No.	Rev.	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These are the basis for the IFC drawings.</div>	<div>Four non-compliances were identified during the audit. These relate to late submission or publication of documents (x3) and one contravention of the CTPMP. In all other respects the Project is complying with the consent. On this basis the Auditor is of the opinion that compliance with this condition is being achieved.</div> <div>There have been no written directions from the Planning Secretary.</div> <div>The project design and delivery is consistent with the EIS and RtS except where modified under Mod 1.</div> <div>These drawings are the plans being used for the development.</div>	Compliant
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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 11/11/20	No directions have been made by the Planning Secretary. No change.	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				These conditions of consent and documents referred to elsewhere in this audit table	This audit assesses compliance with the conditions of consent. No issues.	Not triggered																																																																
Design Amendments																																																																							
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.				TKD architects CC requirements item A5, 17/05/19 BCA CC2 190080/02, 01/07/19 BCA CC3 190080/03, 08/10/19 BCA CC3.1 Crown Certificate Requirements 06/11/19 BCA CC3.2 Crown Certificate CRO-20007, 10/02/20 BCA CC4 Crown Certificate CRO-20057, 30/07/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	The louvre design was approved by the Certifier on 01/07/19 and verified as built through the Crown Completion Certificate.	Compliant																																																																

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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	TKD architects CC requirements item A6, 17/05/19 BCA CC2 190080/02, 01/07/19 BCA CC3.1 Crown Certificate Requirements 06/11/19 BCA CC3.2 Crown Certificate CRO-20007, 10/02/20 BCA CC4 Crown Certificate CRO-20057, 30/07/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	The shade structure design was approved by the Certifier on 01/07/19 and verified as built through the Crown Completion Certificate.	Compliant
Limits of Consent				
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
Prescribed Conditions				
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 and 20/05/20. BCA CC1 190080/01, 24/4/19 BCA CC2 190080/02, 01/07/19 BCA CC3 190080/03, 08/10/19 BCA CC3.1 Crown Certificate Requirements 06/11/19 BCA CC3.2 Crown Certificate CRO-20007, 10/02/20 BCA CC4 Crown Certificate CRO-20057, 30/07/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	Part 6, Division 8A of the EPA Reg relates to prescribed conditions for: - compliance with the BCA - erection of signs - residential building work (not relevant) - entertainment venues (not relevant) - signage for max number of persons for entertainment purposes (not relevant) - shoring and adjoining properties (not relevant) The issue of CCs and the Crown Completion Certificate demonstrates compliance with the BCA to the extent of works that it covers. Signage observed complied with the requirements.	Compliant
Planning Secretary as Moderator				
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 11/11/20	No disputes identified	Not triggered
Long Service Levy				
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. 08/10/19 NSW Long Service Levy payment 08/10/19	Payments made.	Compliant
Legal Notices				
A11	Any advice or notice to the consent authority must be served on the Planning Secretary.	Interview with auditees 11/11/20	No notices being served were identified	Not triggered
Evidence of Consultation				

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"> a) consult with the relevant party prior to submitting the subject document for information or approval; and b) provide details of the consultation undertaken including: <ul style="list-style-type: none"> i. the outcome of that consultation, matters resolved and unresolved; and ii. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved. 	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.	Non-compliance from the first audit: 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. This has now been resolved refer response to CoC B22, B23, B25.	Compliant
Staging, Combining and Updating Strategies, Plans or Programs				
A13	With the approval of the Planning Secretary, the Applicant may: <ul style="list-style-type: none"> 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); 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 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). 	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20	The Staging of the Project was updated following modification 1 to establish 3 phases (stages). The Plans and Strategies already approved remain current for the stages.	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
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	Refer management plans evidence referred to elsewhere in this table.	All plans were prepared for Stage 1 in total. No staging of the plans was required. Minor changes were made to the management plans following findings in previous audits. These were implemented once finalised.	Not Triggered.
Demolition				
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	Interview with auditees 11/11/20 DECC demolition / dismantle HIRAC, 07/10/20	Methodology checking has been done in accordance with AS2601 and Safe Work NSW code of practice – demolition work – 2016.	Compliant
Structural Adequacy				
A17	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. <i>Notes:</i> <ul style="list-style-type: none"> • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. • 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 	Information submitted to Certifying Authority for granting of CC1. BCA CC1 190080/01, 24/4/19 BCA CC2 190080/02, 01/07/19 BCA CC3 190080/03, 08/10/19 BCA CC3.1 Crown Certificate Requirements 06/11/19 BCA CC3.2 Crown Certificate CRO-20007, 10/02/20 BCA CC4 Crown Certificate CRO-20057, 30/07/20	The issue of Construction Certificate and Crown Completion Certificate by Certifier demonstrates compliance with the BCA to the extent of works that it covers.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20		
External Walls and Cladding				
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. External wall elements table by TKD architects, 31/5/19. BCA CC1 190080/01, 24/4/19 BCA CC2 190080/02, 01/07/19 BCA CC3 190080/03, 08/10/19 BCA CC3.1 Crown Certificate Requirements 06/11/19 BCA CC3.2 Crown Certificate CRO-20007, 10/02/20 BCA CC4 Crown Certificate CRO-20057, 30/07/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	External wall specifications stated as being compliant by TKD and verified as-built by the Certifier through Crown Completion Certificate.	Compliant
Applicability of Guidelines				
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
Monitoring and Environmental Audits				
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&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 Coffeys asbestos clearance analysis reports Job No. 754-SYDEN228740 (various) This audit	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. No environmental monitoring was conducted (or required) for the audit period. The monitoring results referred to appear to be carried out consistent with the relevant Standards (NOHSC: 3003). This audit has been conducted in accordance with the Departments IAPAR.	Compliant
Access to Information				
A21	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:	Project website; https://www.schoolinfrastructure.nsw.gov.au/project/s/a/alexandria-park-community-school.html	a) (i), (ii), (iii) Required planning approval documentation, management plans and strategies found on website.	Non-compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<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"> i. the documents referred to in condition A2 of this consent; ii. all current statutory approvals for the development; iii. all approved strategies, plans and programs required under the conditions of this consent; 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; 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; vi. a summary of the current stage and progress of the development; vii. contact details to enquire about the development or to make a complaint; viii. a complaints register, updated monthly; 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; x. any other matter required by the Planning Secretary; and <p>b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>		<p>(iv) and (v) the management plans do not specify reporting arrangements to be published, the conditions do not require monitoring to be undertaken.</p> <p>(vi) Current staging information and project updates provided on website.</p> <p>(vii) Contact details provided for feedback, questions and comments [schoolinfrastructure@det.nsw.edu.au].</p> <p>(viii) Complaints register found on website.</p> <p>(ix) The audit report is available on the website.</p> <p>(x) it is understood that no directions have been received from the planning Secretary.</p> <p>b) The website appears be maintained with up to date information other than the Complaints register.</p> <p>Non-compliance: The Complaints Register sighted on the day of the audit had not been updated since late September 2020.</p>	
Compliance				
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	<p>APCS Site Induction (Rev 6).</p> <p>RCC Canvas online induction and inspection tracking system</p> <p>Induction records Phase 2</p> <p>Environmental inspection 15/07/20, 28/07/20, 29/07/20, 05/08/20, 10/11/20,</p> <p>TBT 22/08/20, 30/06/20, 27/07/20</p> <p>Prestart 02/11/20, 29/10/20, 09/11/20</p>	<p>The material presented communicates a number of requirements relevant to the Project, in particular the Trade Conditions of Subcontracts, which is quite comprehensive. The contract requirement align with the consent. A copy of the consent is also provided.</p> <p>The RCC Canvas system allows for a check of workers induction, tickets,</p> <p>RCC Canvas includes environmental inspections (weekly)</p> <p>The Induction includes information relevant to the tasks being undertaken by the people undertaking construction works. ~2100 x people have been inducted to site as at 11/11/20</p> <p>RCC toolbox talks and pre starts cover matters relating to community and environment are reviewed and discussed at regular intervals.</p>	Compliant
A23	The project may be constructed and operated in stages in accordance with the Staging Report prepared by Urbis dated June 2020. MOD-1	<p>Interview with auditees 11/11/20</p> <p>Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20</p> <p>DPIE approval of Staging Report, 25/08/20</p>	The Staging Report formed part of the modification application and was revised under CoC A24. This revised Staging Report is the basis of staging going forward. Based on works being undertaken and evidence referred to elsewhere in this table it appears as though the project is being staged as per the revised Staging Report.	Compliant
A24	Staging of the proposed development may be varied in accordance with a revised Staging Report (for either or both construction and operation as the case may be) submitted to and approved by the Planning Secretary. MOD-1	<p>Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20</p> <p>DPIE approval of Staging Report, 25/08/20</p>	The Staging Report was revised and approved by the Department in August 2020. This revised Staging Report is the basis of staging going forward.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A25	Any revised Staging Report prepared in accordance with condition A24 must: a) if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; b) if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant); c) specify how compliance with conditions will be achieved across and between each of the stages of the project; and d) set out mechanisms for managing any cumulative impacts arising from the proposed staging. MOD-1	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20	The Staging Report was revised and approved by the Department in August 2020. This revised Staging Report is the basis of staging going forward.	Compliant
A26	The project must be staged in accordance with the Staging Report approved under condition A23 or in accordance with a revised Staging Report approved under condition A24. MOD-1	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20	The Staging Report formed part of the modification application and was revised under CoC A24. This revised Staging Report is the basis of staging going forward. Based on works being undertaken and evidence referred to elsewhere in this table it appears as though the project is being staged as per the revised Staging Report.	Compliant
A27	The terms of this approval that apply or are relevant to the works or activities to be carried out in a specific stage set out in the Staging Report as approved under condition A23 or a revised Staging Report approved under condition A24, must be complied with at the relevant time for that stage. MOD-1	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20	The Staging Report formed part of the modification application and was revised under CoC A24. This revised Staging Report is the basis of staging going forward. Based on works being undertaken and evidence referred to elsewhere in this table it appears as though the project is being staged as per the revised Staging Report.	Compliant
ADVISORY NOTES				
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. There were no other licences approvals or consents required by the project during the audit period.	Not triggered
PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION				
Notification of Commencement				
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.	Letter SINSW to the Department 13/11/20.	On 13/11/20 SINSW provided written notification of commencement of Phase 2 construction (scheduled to commence 01/12/20).	Compliant
Certified Drawings				
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.	SCP structural engineer design compliance statement 17/09/19. BCA CC1 190080/01, 24/4/19 BCA CC2 190080/02, 01/07/19	Structural drawings were prepared to the satisfaction of the Certifier. The Certifier provided a letter to the architects in response to the modification application to remove level 4 from current scope (which at 4/6/20 was under assessment by the Department). The Certifier advise:we are satisfied that the proposed	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		BCA CC3.1 Crown Certificate Requirements 06/11/19 BCA CC3.2 Crown Certificate CRO-20007, 10/02/20 BCA CC4 Crown Certificate CRO-20057, 30/07/20 Certifier letter to TKD Architects, 23/03/20	<i>development, as modified, can still achieve compliance with the NCC Building Code of Australia (BCA) pursuant to s.6.28 of the Environmental Planning & Assessment Regulation 2000 (as applicable to Crown Building Works). In this regard, and as currently documented, compliance will be achieved by a combination of complying with the BCA deemed-to-satisfy and fire engineered Alternative Solutions satisfying the relevant BCA Performance Requirements.</i> No change from previous audit.	
External Walls and Cladding				
B3	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. 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.	External wall elements table by TKD architects, 31/5/19. CC2 01/07/19.	External wall specifications stated as being compliant by TKD and Certifier. No change from previous audit.	Compliant
Protection of Public Infrastructure				
B4	Before the commencement of construction, the Applicant must: <ul style="list-style-type: none"> 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; b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and c) submit a copy of the dilapidation report to the Certifying Authority and Council. 	Consultation Records March 19 with AusGrid, City of Sydney, Jemena, NBN Co, PIPE Networks, RMS, Sydney Water, Telstra NSW, TransGrid & Verizon Business. 24/9/18 Consultation with Sydney Water 5/4/19 Email BM+G, Crown Certificate List Requirements for Demolition 24/9/18 Sydney Water Approval for Building over/adjacent to Sydney Water Asset. Submission of documents to Sydney Water Dilapidations reports for school perimeter, Belmont Street, Buckland Street, Park Road and Amenities, Power Ave 4/4/19 APCS Dilapidation Reports cover letter to City of Sydney. 4/4/19 APCS Crown Certificate List of Requirements for Demolition to BM+G, Cover Letter. BCA CC1 190080/01, 24/4/19 BCA CC2 190080/02, 01/07/19 BCA CC3.1 Crown Certificate Requirements 06/11/19 BCA CC3.2 Crown Certificate CRO-20007, 10/02/20 BCA CC4 Crown Certificate CRO-20057, 30/07/20	Evidence provided of consultations with relevant service providers/owners. Dilapidation reports completed and submitted to Certifying Authority and Council. No change from previous audit.	Compliant
Aboriginal Cultural Heritage				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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 & Streat Archaeological Services.</p> <p>Dec 18 Arboricultural Impact Assessment & Tree Management Plan & Tree Protection Plan.</p> <p>BCA CC1 190080/01, 24/4/19</p> <p>BCA CC2 190080/02, 01/07/19</p> <p>BCA CC3 190080/03, 08/10/19</p> <p>Interviews with auditees 11/11/20</p> <p>10/7/19 email correspondence between APCS and the Department regarding complaint from Aboriginal representative.</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> <p>No change from previous audit.</p>	Compliant
Flooding				
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.	<p>Finished floor levels design statement by TKD architects, 10/5/19.</p> <p>CC2 01/07/19.</p>	<p>Floor levels were deemed to be compliant by TKD and Certifier.</p> <p>No change from previous audit.</p>	Compliant
Site Contamination				
B7	<p>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:</p> <ul style="list-style-type: none"> a) NSW EPA Sampling Design Guidelines; b) Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017; c) https://www.epa.nsw.gov.au/publications/contaminatedland/17p0269-guidelines-forthensw-site-auditor-scheme-third-edition d) Guidelines for Consultants Reporting on Contaminated Sites, 2011 www.epa.nsw.gov.au/resources/clm/20110650consultantsqlines.pdf e) The National Environment Protection (assessment of contamination) Measures 2013 as amended <p>Testing must include assessment of both the soil and groundwater profile</p>	<p>Coffey's Phase 1 and Phase 2 data gap investigation report 07/06/19.</p> <p>Remedial Works Plan 18/06/19</p> <p>ZOIC Site Auditor advice 03/06/20.</p>	<p>Further investigations were carried out after demolition. The existing contamination environmental management plan was deemed suitable, as was the capping method proposed. It informed the development of the RWP.</p> <p>The Contaminated Sites Auditor has directed the project to carry out further investigations under phase 2 (following removal of structures). These investigations are pending.</p> <p>The Remedial Works Plan (2019) includes details on these investigations and remains unchanged from that previously approved.</p>	Compliant.
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.	<p>Coffey's Phase 1 and Phase 2 data gap investigation report 07/06/19.</p> <p>ZOIC Site Auditor advice 20/06/19</p> <p>Remedial Works Plan 18/06/19</p> <p>Submission of Remedial works plan to the Department 28/06/19.</p> <p>ZOIC Site Auditor advice 03/06/20.</p>	<p>Site Auditor advises that RAP is appropriate and LTEMP to be developed on the title for residual contamination held on site.</p> <p>The Remedial Works Plan represents the updated RAP, and it and the RAP was submitted prior to commencement of remediation (19/07/19 start).</p> <p>The Contaminated Sites Auditor has directed the project to carry out further investigations under phase 2 (following removal of structures). These investigations are pending.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			The Remedial Works Plan (2019) includes details on these investigations and remains unchanged from that previously approved.	
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.	Site Auditor approval 20/5/19. Contamination EMP (Asbestos Management Plan) 16/5/19. Coffeys clearance certificates 07/11/19 Surveyors marker layer progress drawing 190726.7019.	The Contamination EMP was prepared, and approved by the auditor prior to remediation works. Coffeys clearance and surveyor marker layer inspections indicate implementation. No issues. The site is now fully capped and sealed. No change from previous audit.	Compliant
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).	Coffeys clearance certificates 07/11/19 Surveyors marker layer progress drawing 190726.7019.	Coffeys clearance and surveyor marker layer inspections indicate implementation. No issues. The site is now fully capped and sealed. Phase 2 investigations are yet to commence.	Compliant
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.	Site Audit Statement, SAS148-1, ZOIC Site Audit Report, ZOIC, 18/09/20	A Site Audit Statement and Site Audit Report was completed by the Contaminated Sites Auditor.	Compliant
B12	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: <ul style="list-style-type: none"> a) identify the location and requirements for ongoing management of asbestos impacted soil and other contaminated soil contained on the site; b) detail the expected limitations on the site land use; c) identify relevant environmental, and health and safety processes and procedures; d) identify management processes, procedures and responsibilities to be adopted by future site users within the site; 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. 	Long Term Environmental Management Plan Alexandria Park Community School (Phase 1) – Park Road, Alexandria NSW SYDEN224285-R03 21 June 2019 LTEMP submission to auditor 02/07/19 Site Audit Statement, SAS148-1, ZOIC Site Audit Report, ZOIC, 18/09/20	The LTEMP was prepared and submitted to the Contaminated Sites Auditor. A Site Audit Statement and Site Audit Report was completed by the Contaminated Sites Auditor.	Compliant
Unexpected Contamination Procedure				
B13	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.	Unexpected contamination finds procedure within the RCC CEMP and the Contamination EMP.	The unexpected finds procedure is developed and is part of the CEMP. Observation from the second audit: The unexpected finds procedure exists in the RCC CEMP, HMMP, the Contamination EMP and within DECC documentation. These should be reviewed to ensure they are in alignment. Where discrepancies exist, the documents should be updated so the unexpected finds procedure align. The Project advise that Coffey's Contamination EMP is the overarching document that applies when DECC are not completing civil works. This is now resolved.	Compliant
Utilities and Services				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B14	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	<p>DBYD applications and files provided from Ausgrid, Telstra, Verizon, Sydney Water, Jemena.</p> <p>NBN approval of telecoms 20/09/19</p> <p>Sydney Water approval 7/06/19 (case 175142)</p> <p>MGP (authorised service provider) approval notice for Sydney Water works 14/11/19.</p> <p>Ausgrid Preliminary Assessment letter 12/09/19 and certified design drawing (cert no: 3475099/20191017 for Kiosk, 6245409/20191031, for TDS).</p> <p>Jemena 28/10/19 email stating sufficient supply (relevant for Phase 2 only).</p>	<p>Approval for each utility has been obtained prior to the works being carried out.</p> <p>No change from previous audit. Phase 2 utility works yet to commence.</p>	Compliant
B15	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.	Refer to evidence sighted in CoC B14 above.	Refer to response to CoC B14 above.	Compliant
Community Communication Strategy				
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> <ol style="list-style-type: none"> identify people to be consulted during the design and construction phases; set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; set out procedures and mechanisms: <ol style="list-style-type: none"> through which the community can discuss or provide feedback to the Applicant; through which the Applicant will respond to enquiries or feedback from the community; and 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. <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>https://www.schoolinfrastructure.nsw.gov.au/projects/a/alexandria-park-community-school.html#category-reports</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> <p>The Project website contains community consultation information (project updates, work updates, complaints register, contact information) that indicates that the CCS is being implemented.</p>	Compliant
Ecologically Sustainable Development				
B17	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>Green star registration for 4 star 01/04/19.</p> <p>Submission to CA 27/06/19.</p>	Registration was completed and submitted to the Certifier prior to commencement of stage 2 as required by the condition.	Compliant
Outdoor Lighting				
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	<p>Electrical design statement 30/09/19</p> <p>CC3 granted 08/10/19.</p>	The design statement was prepared to the satisfaction of the Certifier prior to the relevant stage (stage 3).	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Access for People with Disabilities				
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.	Morris Glen access consultant statement of compliance 25/09/19 and access review (August 2019). CC3 granted 08/10/19.	The design was reviewed by specialist as being compliant and approved by Certifier prior to stage 3.	Compliant
Construction Environmental Management Plan				
B20	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: a) Details of: i. hours of work; ii. 24-hour contact details of site manager; iii. management of dust and odour to protect the amenity of the neighbourhood; iv. stormwater control and discharge; v. measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; vi. groundwater management plan including measures to prevent groundwater contamination; vii. external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting; ix. community consultation and complaints handling; b) Construction Traffic and Pedestrian Management Sub-Plan (see condition B22); c) Construction Noise and Vibration Management Sub-Plan (see condition B23); d) Construction Waste Management Sub-Plan (see condition B24); e) Construction Soil and Water Management Sub-Plan (see condition B25); f) an unexpected finds protocol for contamination and associated communications procedure; g) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and 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	Alexandria Park Community School No:1161 Construction Environmental Management Plan (CEMP) 14 March 2019 Reference of Heritage Management Plan, April 2019. Refer CoC B5. Construction Traffic and Pedestrian Management Sub-Plan, Craig Reeves (no date or revision number) Construction Noise Vibration Management Plan (CNVMSP), Acoustic Logic, January 2020. Refer CoC B23 Construction Soil and Water Management Plan, SCP Engineers and Development Consultants, 26 July 2019. Refer CoC 25 RCC Alexandria Park Community School 1161 Construction Waste Management Plan 10/11/2020 (CWMSPP)	CEMP includes: 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]. b) Construction Traffic and Pedestrian Management Sub-Plan [this plan addresses item vi of this condition] c). Construction Noise and Vibration Management Sub-Plan d). Construction Waste Management Sub-Plan e). Construction Soil and Water Management Sub-Plan f). Unexpected finds protocol – contamination g). unexpected finds protocol for Aboriginal and Non-Aboriginal Heritage, refer attached Heritage Management Plan CoC 5 h). Waste Classification and Validation, refer documents Asbestos Management plan Rev 1. Construction Waste Management Plan rev 1 and Hazardous Materials Management Plan. Refer to responses to CoC B22 – B25 regarding the adequacy of the sub-plans.	Compliant
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.	10/4/19 Schools Infrastructure NSW Submission APCS & SSD8373: Certifier approved CEMP to DPE. 8/4/19 BM+G Certifying Authority, accepted CEMP. 5/4/19 Email Crown Certificate List of Requirements for Demolition [BM+G] CEMP Plan, 14 March 2019.	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
		BCA CC1 190080/01, 24/4/19 BCA CC2 190080/02, 01/07/19 BCA CC3 190080/03, 08/10/19		
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"> a) be prepared by a suitably qualified and experienced person(s); b) be prepared in consultation with Council and RMS; 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; d) detail heavy vehicle routes, access and parking arrangements; e) include a Driver Code of Conduct to: <ul style="list-style-type: none"> i. minimise the impacts of earthworks and construction on the local and regional road network; ii. minimise conflicts with other road users; iii. minimise road traffic noise; and iv. ensure truck drivers use specified routes; f) a program to monitor the effectiveness of these measures; and g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes. 	<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>RMS correspondence of review 31/07/19</p> <p>Daily traffic control inspection</p> <p>Site inspection 11/11/20</p>	The CTPMSP adequately addresses requirements a), c), d), e), f), g) and remains unchanged from the previous audit. Refer to previous audits with regards to detailed assessment of the content of the document.	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"> a) be prepared by a suitably qualified and experienced noise expert; b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; d) include strategies that have been developed with the community for managing high noise generating works; e) describe the community consultation undertaken to develop the strategies in condition B23(d); and f) include a complaints management system that would be implemented for the duration of the construction. 	<p>Construction Noise Vibration Management Plan (CNVMSP), Acoustic Logic, January 2020.</p> <p>Consultant curriculum vitae</p> <p>Consultation records from SINSW to strata agents 05/07/19</p>	The CNVMSP adequately addresses requirements a), b), c), d) and f). and remains unchanged from the previous audit. Refer to previous audits with regards to detailed assessment of the content of the document.	Compliant
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"> (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; (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 	<p>Richard Crookes Constructions Hazardous Materials Management Plan Alexandria Park Community School Buckland Street, Alexandria NSW 2015, 3 April 2019 (HMMP)</p> <p>RCC Alexandria Park Community School 1161 Construction Waste Management Plan 10/11/2020 (CWMSP)</p> <p>Certifier acceptance of CWMSP update, June 2020.</p> <p>Post approval portal lodgment 18/06/20</p>	The CWMSP includes the information required by the condition for phase 1 and phase 2.	Compliant
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"> (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction; (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); (d) detail all off-Site flows from the Site; and (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) 	<p>Construction Soil and Water Management Plan, SCP Engineers and Development Consultants, 26/07/19 (CSWMSP)</p> <p>Author curriculum vitae</p> <p>Consultation with Council 22/7/19</p>	The CSWMSP adequately addresses requirements a) – e). Refer to previous audits with regards to detailed assessment of the content of the document.	Compliant
Construction Parking				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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	APCS Site Induction (Rev 6). Induction records Phase 2 Site inspection 11/11/20	Sufficient construction vehicle parking provided and requirements communicated to workforce. No issues observed.	Compliant
Stormwater Management System				
B27	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: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the EIS; (c) be in accordance with applicable Australian Standards; (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;	SCP stormwater management design certificate 13/9/19. CC3 granted 08/10/19.	The stormwater management system has been designed in accordance with this condition and approved by the Certifier.	Compliant
Operational Noise- Design of Mechanical Plant and Equipment				
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.	Acoustic design certificate, 6/9/19. CC3 granted 08/10/19.	The acoustic consultant and Certifier have verified that the design has incorporated the noise mitigations and performance specifications required by the condition.	Compliant
Construction and Demolition Waste Management				
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. No change.	Compliant
Operational Waste Storage and Processing				
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.	Operational Waste management plan swept path 21/5/19. Council agreement 18/06/19	Council has reviewed and approved the operational waste storage area design.	Compliant
Mechanical Ventilation				
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.	Design certificate 26/8/19 CC3 granted 08/10/19.	The ventilation specialist and the Certifier have verified that mechanical ventilation design complies with this requirement.	Compliant
Rainwater Harvesting				
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.	Sparks design certificate 12/9/19 CC3 granted 08/10/19.	The hydraulic engineer and Certifier have verified that the design complies with this condition.	Compliant.
Car Parking and Service Vehicle Layout				

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"> (a) all vehicles must enter and leave the Site in a forward direction; (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; (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 (d) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed. 	<p>TKD design certificate 31/5/19.</p> <p>CC2 01/07/19</p>	<p>The architect and Certifier have verified the car parking and vehicle layout plan complies with this requirement.</p>	Compliant
Bicycle Parking and End-of-Trip Facilities				
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"> (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; (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; (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; (d) details of any proposed staged delivery of bicycle parking spaces to ensure the demand generated during staged redevelopment is met; (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; (f) the provision of end-of-trip facilities for staff in accordance with the ESD Design & As Built rating tool, including a minimum 2 staff shower facilities; (g) appropriate pedestrian and cyclist advisory signs are to be provided; and (h) all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority. 	<p>TKD design certification 17/05/19</p> <p>CC2 01/07/19</p>	<p>The architect and Certifier have verified that the bike facilities comply with this requirement.</p>	Compliant.
Public Domain Works				
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>	<p>City of Sydney Stamped plans for public domain 10/07/20</p> <p>BCA CC4 Crown Certificate CRO-20057, 30/07/20</p>	<p>The stamped plans indicate acceptance from Council of the public domain design and submission of those documents as required by this condition.</p> <p>Issuance of CC4 from Certifier demonstrates their acceptance of compliance with this condition.</p>	Compliant
Compliance Reporting				
B36	<p>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.</p> <p>Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).</p> <p>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.</p>	<p>Compliance Reporting, Post Approval Requirements, May 2020</p> <p>Letter from Department, entitled Compliance Reporting and Independent Environmental Audit, 10/07/20</p>	<p>The project has adopted the 2020 revision of the Compliance Reporting Post Approval Requirements. No Compliance Reports were required under the revised PAR.</p>	Not triggered
B37	<p>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</p>	<p>Site inspection 11/11/20</p>	<p>Works are in construction.</p>	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Landscaping				
B38	<p>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:</p> <ul style="list-style-type: none"> (a) be generally in accordance with the approved landscape plan outlined in condition A2 prepared by Context Landscape Design Pty Ltd; (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); (c) detail the species to be planted on-site, including the 69 advanced compensatory trees 75 L to 100 L in size; (d) describe the monitoring and maintenance measures to manage revegetation and landscaping works; (e) be consistent with the Applicant's Management and Mitigation Measures in the EIS; (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. 	<p>Context Landscape Management Plan 27/6/19.</p> <p>CC2 01/07/19</p>	<p>The Landscape Management Plan has been prepared and verified by the Certifier as addressing this condition.</p>	Compliant
Unencumbered Outdoor Play Space				
B39	<p>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.</p>	<p>TKD design certificate and attached plan 21/5/19.</p> <p>CC2 01/07/19</p>	<p>The architect and Certifier have verified that the outdoor play space has been designed as required by this condition.</p>	Compliant
PART C DURING CONSTRUCTION				
Interpretation Strategy				
C1	<p>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.</p>	<p>Refer to response to CoC B1. Construction commenced 10/04/19.</p> <p>Aboriginal Cultural Overlay Strategy 15/11/19.</p> <p>Aboriginal Cultural heritage Interpretation strategy Benjamin Streat & Yolanda Pavincich Archaeological Management and Consulting Group & Streat Archaeological Services (18/09/19)</p> <p>Submission to Certifier 18/11/19.</p>	<p>The HIS was prepared by the qualified heritage consultant on 18/09/19 (within 6 months of commencement) and provided to the Certifier on 18/11/19.</p>	Compliant
Approved Plans to be On-site				
C2	<p>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.</p>	<p>The evidence referred to elsewhere in this Audit Table.</p> <p>Aconex files containing approved plans</p>	<p>Approved and certified plans and documents were readily available.</p>	Compliant
Site Notice				
C3	<p>A site notice(s):</p> <ul style="list-style-type: none"> (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. (b) is to satisfy all but not be limited to, the following requirements: <ul style="list-style-type: none"> 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; ii. the notice is to be durable and weatherproof and is to be displayed throughout the works period; 	<p>Site inspection 11/11/20</p>	<p>Site notice in place and compliant with the requirements</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	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 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.			
Operation of Plant and Equipment				
C4	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	Crane pre-work risk assessment 60T and 130T Permit to excavate 25/08/20 Plant equipment induction checklist, 19/10/20 (x2), 15/10/20, 14/10/20, 20/10/20 SWMS 20/09/20 and 21/08/20	Plant onboarding process includes inspections maintenance records, risk assessment (for high risk plant), lifting plans (for cranes) 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. SWMS / Risk assessment identify risks associated with plant, and required controls. These processes ensure proper and efficient maintenance and operation.	Compliant
Demolition				
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.	Interview with auditees 11/11/20 DECC demolition / dismantle HIRAC, 07/10/20	Methodology checking has been done in accordance with AS2601 and Safe Work NSW code of practice – demolition work – 2016.	Compliant
Construction Hours				
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 (Rev 6). RCC Canvas online induction and inspection tracking system Induction records Phase 2 Construction Noise Vibration Management Plan (CNVMSP), Acoustic Logic, January 2020. Complaints register to 16/11/20 Environmental Planning and Assessment (COVID-19 Development – Construction Work Days) Order 2020	Approved project hours are included in project documentation and communicated to the workforce. Section 10 of the CNVMSP recommends more stringent periods of work, for works predicted to exceed 75dB(A) at the nearest receiver. The project advises that extended construction hours on Saturdays and Sundays are being utilised pursuant to the COVID-19 Development – Construction Work Days Order 2020, which came into force from 31/03/20. No other OOHW were conducted during the audit period. There were no OOHW related complaints received during the audit period that were attributable to the construction of the project.	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.	APCS Site Induction (Rev 6). RCC Canvas online induction and inspection tracking system Induction records Phase 2 Construction Noise Vibration Management Plan (CNVMSP), Acoustic Logic, January 2020.	Approved project hours are included in project documentation and communicated to the workforce. Section 10 of the CNVMSP recommends more stringent periods of work, for works predicted to exceed 75dB(A) at the nearest receiver. The project advises that extended construction hours on Saturdays and Sundays are being utilised pursuant to the COVID-19 Development –	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	Notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	Complaints register to 16/11/20 Environmental Planning and Assessment (COVID-19 Development – Construction Work Days) Order 2020	Construction Work Days Order 2020, which came into force from 31/03/20. No other OOHW were conducted during the audit period. There were no OOHW related complaints received during the audit period that were attributable to the construction of the project.	
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 (Rev 6). RCC Canvas online induction and inspection tracking system Induction records Phase 2 Construction Noise Vibration Management Plan (CNVMSP), Acoustic Logic, January 2020. Site inspection 11/11/20	Approved project hours are included in project documentation and communicated to the workforce. There is currently no need for these activities on site.	Compliant
Implementation of Management Plans				
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).	Evidence referred to elsewhere in this Table. Site inspection 11/11/20 Environmental inspection 15/07/20, 28/07/20, 29/07/20, 05/08/20, 10/11/20, TBT 22/08/20, 30/06/20, 27/07/20 Prestart 02/11/20, 29/10/20, 09/11/20	The management plans appear to have been implemented during the audit period other than below. Non-compliance: Section 2.5 of the CTPMSP states that the largest vehicle expected and allowed to site is a Heavy Rigid Vehicles (HRV) which will be 12.5 metres long. 2 x semi-trailers that were longer than 12.5 metres were observed entering the site on the day of the site inspection. Also, Section 3.2 of the CTPMSP states that no demolition or construction vehicles will enter or exit the site from park Road / Power Avenue between the times of 08:30 and 09:30 am. The two movements above occurred at approximately 08:30am.	Non-compliant
Construction Traffic				
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.	APCS Site Induction (Rev 6). RCC Canvas online induction and inspection tracking system Induction records Phase 2 Site inspection 11/11/20	All staff are instructed to keep construction vehicles inside the site. 2 x heavy vehicles arrived on site during the site inspection. No issues observed.	Compliant
Road Occupancy Licence				
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 11/11/20	None required for the audit period.	Not triggered
SafeWork Requirements				

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>Site notice 11/11/20</p> <p>Site fencing and hoarding 11/11/20</p> <p>Crane pre-work risk assessment 60T and 130T</p> <p>Permit to excavate 25/08/20</p> <p>Plant equipment induction checklist, 19/10/20 (x2), 15/10/20, 14/10/20, 20/10/20</p> <p>SWMS 20/09/20 and 21/08/20</p> <p>Coffeys asbestos clearance analysis reports Job No. 754-SYDEN228740 (various)</p> <p>Incident register current to 10/11/20</p> <p>SafeWork improvement notice 10/06/20</p> <p>SafeWork confirmation of completion of improvement notice 12/06/20</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>Plant onboarding process includes inspections maintenance records, risk assessment (for high risk plant), lifting plans (for cranes) 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>SWMS / Risk assessment identify risks associated with plant, and required controls.</p> <p>Asbestos removal completed accordance with Remediation Works Plan. Clearance certificates are issued as each area is cleared.</p> <p>No incidents were identified in the project incident register for the audit period.</p> <p>SafeWork attended the site during an industrial dispute and walked the site with all parties. One issue was identified and RCC implemented corrective actions immediately SafeWork provided written acceptance 2 days after the inspection.</p>	Compliant
Hoarding Requirements				
C13	<p>The following hoarding requirements must be complied with:</p> <ul style="list-style-type: none"> (a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; (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 (c) the Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve. 	<p>Site inspection 11/11/20</p> <p>Photo 13/11/20</p>	<p>All hoarding is within project footprint (no Council approval required).</p> <p>Evidence shows that graffiti identified on the day of the audit was removed within 48 hrs.</p>	Compliant
No Obstruction of Public Way				
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 11/11/20	No obstruction of public way observed.	Compliant
Construction Noise Limits				
C15	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>APCS Site Induction (Rev 6).</p> <p>RCC Canvas online induction and inspection tracking system</p> <p>Induction records Phase 2</p> <p>Construction Noise Vibration Management Plan (CNVMSP), Acoustic Logic, January 2020</p> <p>Environmental inspection 15/07/20, 28/07/20, 29/07/20, 05/08/20, 10/11/20,</p>	<p>The Project has demonstrated that all reasonable and feasible steps are being undertaken to manage noise. The management measures are consistent with Sections 10 and 11 of the CNVMSP.</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>Communication with the school is ongoing. The works are scheduled to work around the HSC</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		TBT 22/08/20, 30/06/20, 27/07/20 Prestart 02/11/20, 29/10/20, 09/11/20Site inspection 11/11/20 Complaints register to 16/11/20 APCS examination schedule summary and communication to DECC, 27/10/20	exams. The exam schedule has been communicated to site teams. As with the previous audit findings, despite the Project demonstrating that reasonable and feasible controls are being implemented (other than contraventions of CoC C6 and C7), 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 (and are predicted in the CNVMSP), as are complaints. 10 x complaints have been received since June 2020 relating to noise (works running over time, music and personnel and the COVID-19 Development – Construction Work Days Order 2020).	
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.	APCS Site Induction (Rev 6). RCC Canvas online induction and inspection tracking system Induction records Phase 2 Alexandria Park Community School CNVMSP. Complaints register to 16/11/20 Environmental Planning and Assessment (COVID-19 Development – Construction Work Days) Order 2020	Approved project hours are included in project documentation and communicated to the workforce. Section 10 of the CNVMSP recommends more stringent periods of work, for works predicted to exceed 75dB(A) at the nearest receiver. The project advises that extended construction hours on Saturdays and Sundays are being utilised pursuant to the COVID-19 Development – Construction Work Days Order 2020, which came into force from 31/03/20. No other OOHW were conducted during the audit period. There were no OOHW related complaints received during the audit period that were attributable to the project.	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 11/11/20 Site inspection 11/11/20	There is only 1 x excavator and 1 x mobile crane on site. These were not moving during the inspection, however the crane does not have a beeper that operates at all times on site. Trucks are fitted with tonal beepers however these are only on site for a delivery or pick up and are not able to be enforced by the project.	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	Whilst there have been instances of works occurring outside of construction hours, the noise impacts are as predicted in the EIS and the CNVMSP.	Compliant
Vibration Criteria				
C19	Vibration caused by construction at any residence or structure outside the site must be limited to: (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 (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).	Site inspection 11/11/20 Interview with auditees 11/11/20	Works no longer involved vibration intensive plant or activities. No vibration related complaints were received during the audit period.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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	Site inspection 11/11/20 Interview with auditees 11/11/20	Works no longer involved vibration intensive plant or activities. No vibration related complaints were received during the audit period.	Not triggered
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.	The CNVMSP has been prepared so that it establishes a process whereby exceedances of the criteria are managed.	Compliant
Tree Protection				
C22	For the duration of the construction works: (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; (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; (c) all trees on the site must be suitably protected during construction as per (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 (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.	Dec 18 Arboricultural Impact Assessment & Tree Management Plan & Tree Protection Plan. Site inspection 11/11/20 Arboricultural Report, Redgum, 17/11/20	No street trees have been trimmed or removed. All trees at risk of being damaged have tree protection zones or other protection in place and no works have occurred within the tree protection zones. The Arborist provided written advice on 17/11/20 that controls throughout phase 1 were adequate and that required specimens were retained.	Compliant
Flora and Fauna Protection				
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.	Technical Studies: Flora & Fauna Survey for the Proposed Redevelopment of Alexandria Park Community School, Alexandria, prepared by UBM Ecological and dated 24 April 2018 Arboricultural report, Redgum, 27/6/19. Site inspection 11/11/20 Arboricultural Report, Redgum, 17/11/20	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. The Arborist provided written advice on 17/11/20 that controls throughout phase 1 were adequate and that required specimens were retained.	Compliant
Dust Minimisation				
C24	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Site inspection 11/11/20	The Project is now in a construction phase where dust generation is negligible. The site is sealed and temporary building removal is underway for phase 2. Phase 1 works were completed. The site was generally free of debris. No issues.	Compliant
C25	During construction, the Applicant must ensure that: (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Site inspection 11/11/20 Construction Soil and Water Management Plan, SCP Engineers and Development Consultants. Project ERSED Plans, SCP-CV-DWG-1500 and 1501	The Project is now in a construction phase where dust generation is negligible. The site is sealed and temporary building removal is underway for phase 2. Phase 1 works were completed. The site was generally free of debris. No issues. No material is being excavated, exposed, or loaded in or out.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			Public roadways were observed to be clean.	
Air Quality Discharges				
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
Erosion and Sediment Control				
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 11/11/20 Construction Soil and Water Management Plan, SCP Engineers and Development Consultants. Project ERSED Plans, SCP-CV-DWG-1500 and 1501	The erosion and sediment control plans are developed for phase 1 and phase 2. The site is sealed and temporary building removal is underway for phase 2. Phase 1 works were completed. Controls for phase 2 will be installed prior to the lifting of the slab which is pending.	Compliant
Imported Soil				
C28	The Applicant must: (a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Certifying Authority upon request.	Imported material register current to 11/11/20 VENM certificate, CS, 27/06/19 BORAL rail ballast VENM certificate, 28/06/18 Site Audit Statement, SAS148-1, ZOIC Site Audit Report, ZOIC, 18/09/20	The imported material register identifies what material was imported, the volumes, dates and intended use. The material records sighted demonstrate that the material was classified as VENM, ENM or covered under an EPA General Exemption and Order. The Contaminated Sites Auditor verifies material imported is fit for use and compliance with EPA requirements. This is confirmed through issue of the Site Audit Statement and Site Audit Report - Appendix F.	Compliant
Disposal of Seepage and Stormwater				
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.	Interview with auditees 11/11/20 Site inspection 11/11/20 Construction Soil and Water Management Plan, SCP Engineers and Development Consultants. Project ERSED Plans, SCP-CV-DWG-1500 and 1501	There are no sumps or basins on site that require discharge. All controls are passive and the slab is still intact. There is no need for pumping. 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. 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).	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 11/11/20 Site inspection 11/11/20	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. No unexpected finds to date.	Not triggered
Unexpected Finds Protocol- Historic Heritage				
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 11/11/20 Site inspection 11/11/20 Aboriginal Cultural Heritage Management Plan, Version 2 May 2019, AMAC & Streat Archaeological Services.	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. No unexpected finds to date.	Not triggered
Waste Storage and Processing				
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 11/11/20	Waste was observed to be segregated, secured and confined to the site	Compliant
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).	Waste register current to October 2020. Grasshopper monthly waste reports August, September 2019. Grasshopper waste disposal report October 20.	Demolition complete. All hazardous materials had gone to SUEZ Kemps Creek during previous audit periods. A waste register is being maintained by the project. It identifies waste types, volumes, dates removed and % recycled. All waste generated is classified as building and demolition waste which is pre-classified as GSW non-putrescible under the Waste Classification Guidelines. These wastes all go to EPL licenced premises which are identified in the CWMSP.	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.	Interview with auditees 11/11/20 Site inspection 11/11/20 Construction Soil and Water Management Plan, SCP Engineers and Development Consultants. Project ERSED Plans, SCP-CV-DWG-1500 and 1501	Refer response to CoC C24 and C25 No issues observed. No excavation occurred since the last audit.	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 or artificial watercourse.	Interview with auditees 11/11/20 Site inspection 11/11/20 Construction Soil and Water Management Plan, SCP Engineers and Development Consultants. Project ERSED Plans, SCP-CV-DWG-1500 and 1501	Washout trays available on site. Once cured they get sent off as GSW. No concrete washouts occurred during the audit period.	Compliant
Handling of Asbestos				

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 and for non-friable 29/07/19 – 20/06/2022, and for friable 01-02/05/20. Coffeys asbestos clearance analysis reports Job No. 754-SYDEN228740 (various)	ASP (asbestos removal licence 210968) registered removal with Safework. All asbestos removal was completed prior to the current audit period.	Compliant
Community Engagement				
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.	Website https://www.schoolinfrastructure.nsw.gov.au/project/s/a/alexandria-park-community-school.html Project works letterbox drops 10/08/20, 02/07/20 RCC to APCS, 30/10/20	The Project has demonstrated ongoing consultation with the school, the Department, and nearby properties as required. This includes: - submission of disruption notices (which include dates and times of works, what the works involve and endorsement from the schools of the disrupting works) - submission of documents to the Department (as referred to elsewhere in this audit table) - project updates and letterbox drops to surrounding receivers and on the website.	Compliant
Independent Environmental Audit				
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
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: (a) an initial construction Independent Audit must be undertaken within 8 weeks of the notified commencement date of construction; and (b) a subsequent Independent Audit of construction must be undertaken no later than 26 weeks from the date of the initial construction Independent Audit.	Independent Audit Program V1, 13/05/19	The schedule reflects this condition	Compliant
C41	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 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).	Independent Audit Report, V1, 15/06/20 Independent Audit Program V1, 13/05/19	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: (a) review and respond to each Independent Audit Report prepared under condition C41 of this consent; (b) submit the response to the Department and the Certifying Authority; and (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.	Independent Audit Report, V1, 15/06/20 Post approval portal lodgment 23/06/20 Savills email to Certifier, 24/06/20 Savills email to Certifier, 01/07/20 https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/a/alexandria-park-community-school/june-uploads-	The third audit report, along with the response, was submitted to the Department on 23/06/20 (this included notification of publication) and Certifier on 24/06/20. The responses are consistent with the actions identified in the audit report. The Certifier was notified of publication on 01/07/20.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		2020/AlexandriaParkCS Independent audit report.pdf	The Audit Report (which includes actions consistent with the response) was published > 7 days after notification to the stakeholders.	
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	Site inspection 11/11/20	Works are in construction. Observation: The Auditor considers there to be sufficient challenges and limited value in undertaking operational audits as part of the current audit program.	Not triggered.
Incident Notification, Reporting and Response				
C44	The Department must be notified in writing to compliance@planning.nsw.qov.au 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. Subsequent notification must be given, and reports submitted in accordance with the requirements set out in Appendix 1.	Incident register current to 10/11/20	No notifiable incidents identified in the audit period.	Not triggered
Non-Compliance Notification				
C45	The Department must be notified in writing to compliance@planning.nsw.qov.au within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Department in writing to compliance@planning.nsw.qov.au within seven days after they identify any non-compliance. 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. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Interview with auditees 11/11/20 Incident register current to 10/11/20 Non-compliance notification to the Department 17/06/20 (x2)	Non-compliance from previous audit: The complaint register indicates that two complaints about noise outside of approved hours were verified to be as a result of construction works occurring out of hours. The works were not permissible under the out of hours works terms set out in CoC C7. The Auditees confirmed as part of the audit that the out of hours works were non-compliant with CoC C6, but had not been reported in accordance with CoC C45. These were subsequently notified on 17/06/20. No new non-compliances were identified by the project.	Compliant
Revision of Strategies, Plans and Programs				
C46	Within three months of: (a) the submission of a compliance report under condition B36; (b) the submission of an incident report under condition C44; (c) the submission of an Independent Audit under condition C41; (d) the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Department and the Certifying Authority must be notified in writing that a review is being carried out.	CCR for reporting period 01/11/2019 until 30/04/2020, and submission letter to the Department 11/05/20. Incident register current to 10/11/20 Independent Audit Report, V1, 15/06/20 Post approval portal lodgment 23/06/20 Interview with auditees 11/11/20 Notification of review to Certifier 18/06/20	A Compliance Report was submitted on 11/05/20. No incidents were identified during the audit period. The Audit Report was submitted on 23/06/20 No directions were issued from the Planning Secretary. The Certifier was notified of the review on 23/06/20. Non-compliance: There is no evidence to demonstrate that the Department was notified of the review undertaken in June 2020.	Non-compliant
C47	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.	As above. RCC Alexandria Park Community School 1161 Construction Waste Management Plan 10/11/2020 Certifier acceptance of CWMS update, June 2020.	An update to the CWMS occurred following the previous audit. This was submitted to the Certifier (whom approved the change) and the Department in June 2020.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	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	Post approval portal lodgment 18/06/20		
PART D PRIOR TO OCCUPATION OR COMMENCEMENT OF USE				
Notification of Occupation				
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.	Post approval portal lodgment, 08/07/20	Term 4 was the first day of operations, which was 12/10/20.	Compliant
External Walls and Cladding				
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.	External wall elements table by TKD architects, 31/5/19. CC2 01/07/19. Certifier list of acceptance 17/09/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	External wall specifications stated as being compliant by TKD and Certifier.	Compliant
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	Certifier list of acceptance 17/09/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20 Post approval portal lodgment, 16/09/20	The information was provided to the Department at the same time as the Certifier accepted it.	Compliant
Post-construction Dilapidation Report				
D4	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: (a) to ascertain whether the construction created any structural damage to adjoining buildings or infrastructure. (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: i. compare the post-construction dilapidation report with the pre-construction dilapidation report required by these conditions; and ii. have written confirmation from the relevant authority that there is no adverse structural damage to their infrastructure and roads. (c) to be forwarded to Council.	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20 Interview with auditees 11/11/20	The auditees advise that the approved Staging Report designates this condition to be fulfilled prior to the operation of phase 2, that is: it will be completed prior to operation of phase 2, but cover both phase 1 and phase 2. This staging was approved by the department.	Not triggered
Protection of Public Infrastructure				
D5	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development. 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)	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20 Interview 11/11/20	There have been no directions from public utilities indicating damage and required repair for the audit period. Final dilapidation and repairs (if required) will be completed following construction.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Utilities and Services				
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.	Section 73 compliance certificate, Sydney Water, 31/07/20 Email RCC to Certifier, 03/08/20	The Sydney Water compliance certificate was issued in July, prior to opening. The certificate was provided to the Certifier in August. Observation: Council is not the authority of the infrastructure under the Water Management Act, Sydney Water is. As such the compliance certificate was not obtained from Council.	Compliant
Works as Executed Plans				
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.	WAE Stamped Plans, SCP, 27/07/20 Email RCC to Certifier, 09/09/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	The works as executed plans were signed by the registered surveyor verifying stormwater drainage and finished ground levels were constructed as per design. This was submitted to the Certifier. The Crown Completion Certificate demonstrates Certifier acceptance of receipt of the work as executed plans.	Compliant
Operational Transport and Access Management Plan				
D8	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: 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; b) the location of all car parking spaces on the school campuses and their allocation (i.e. staff, visitor, accessible, emergency, etc.); c) the location and operational management procedures of the pick-up and drop-off parking, including staff management/traffic controller arrangements; 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; e) delivery and services vehicle and bus access and management arrangements; f) management of approved access arrangements; g) potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing pick-up and drop-off parking; h) car parking arrangements and management associated with the proposed use of school facilities by community members; and i) a monitoring and review program. The OTAMP(s) must be submitted to the Secretary for approval prior to operation of the development. The OTAMP(s) (as revised from time to time) must be implemented by the Applicant for the life of the development	Post approval portal lodgment, 29/06/20 OTAMP, 27/06/20 Evidence of consultation, 12/06/20, 27/05/20. Department approval of OTAMP, 10/08/20	The OTAMP was prepared in consultation with the identified stakeholders and addresses the requirements of this condition. The Department approved the OTAMP on 10/08/20	Compliant
Green Travel Plan				
D9	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: a) be prepared by a suitably qualified traffic consultant in consultation with Council and Transport for NSW;	Green Travel Plan, Arup, 24/06/20 Council approval of GTP, 26/05/20 TfNSW approval, 07/07/20	The Green Travel Plan was prepared and addresses the requirements of this condition via: - consultation with and approval from the identified stakeholders	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	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; c) include specific tools and actions to help achieve the objectives and mode share targets; 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 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.	Post approval portal lodgment, 17/07/20	- requirements b) – e) addressed in sections 2, 3, 4 of the GTP. The GTP was submitted to the Department in July 2020.	
Parking Restrictions				
D10	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 to apply on a part-time basis on School Days only between 8 am to 9.30 am and 2.30 pm- 4 pm. 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. Evidence of approval and installation of relevant signage must be submitted to the Planning Secretary prior to the commencement of operations of Phase 1.	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20	The approved Staging Report identifies this requirement as being triggered in Phase 3. Which has yet to commence.	Not triggered
Evacuation and Emergency Management Plan				
D11	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: <ul style="list-style-type: none"> a) predicted flood levels; b) flood warning time and flood notification; c) assembly points and evacuation routes; d) shelter in place, evacuation and refuge protocols; and e) awareness training for employees and contractors. A copy of the Plan must be submitted to the NSW SES, Council and the Planning Secretary.	Operational Flood Evacuation and Emergency Management Plan (OFEMP), Woolacotts, 12/06/20 Email between Savills and Council, 11/06/20, 18/06/20 Emails between SES and Savills, 22/05/20 Post approval portal lodgment, 18/06/20	Council and SES did not provide any comments on the Operational Flood Evacuation and Emergency Management Plan (OFEMP). The OFEMP was submitted to the Department for information in June 2020. The OFEMP addresses the requirements from this conditions via: <ul style="list-style-type: none"> - preparation by a senior civil engineer (MIE No. 4192513) - a) identification of flood levels in section 2.6 - b) flood warning time and flood notification included in section 4 - c) assembly points and evacuation routes in Section 6 and Appendix B; - d) shelter in place, evacuation and refuge protocols in Section 6 - e) awareness training for employees and contractors in Section 5. 	Compliant
Mechanical Ventilation				
D12	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: <ul style="list-style-type: none"> a) the BCA; 	Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20 Mechanical Services, Installation Certificate, 31/08/20	The Installation Certificate states that the installation was completed in accordance with the BCA and relevant standards. The Certifier verified compliance via issue of the Crown Completion Certificate.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	b) AS 1668.2-2012 The use of air-conditioning in buildings- Mechanical ventilation in buildings and other relevant codes; c) the development consent and any relevant modifications; and d) any dispensation granted by the NSW Fire Brigade.			
Road Damage				
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.	Interview with auditees 11/11/20 Site inspection 11/11/20	No damage has been identified by the Project. No third parties have notified the Project of any damage.	Not triggered
Fire Safety Certification				
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.	Email RCC to Council, 24/09/20 Fire Safety Certificate, Buildings B, C, D, E (phase 1) Fire Certification Displayed in Main Reception.pdf	Schools infrastructure authorised the Fire Safety Certificate and it was submitted to Council. Evidence shows that it is prominently displayed in the building.	Compliant
Structural Inspection Certificate				
D15	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: <ul style="list-style-type: none"> 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 b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s. c) person/s authorised to, for the life of the development 	Structural Inspection Certificate, SCP, 16/09/20 Email RCC to Council, 24/09/20 Email RCC to Certifier, 17/09/20 Email Certifier to RC, 18/09/20 Post approval portal lodgment, 29/09/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	The Structural Inspection Certificates were prepared by SCP engineers and submitted to the Department, Council and the Certifier. Certifier provided approval on 18/09/20	Compliant
Compliance with Food Code				
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.	Kitchen Construction Compliance Certificate, 26/09/20 Email RCC to Certifier and acceptance, 08/09/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	The Kitchen Construction Compliance Certificate states that the facilities comply with the relevant standard. The Certifier confirmed satisfaction.	Compliant
Stormwater Quality Management Plan				
D17	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: <ul style="list-style-type: none"> a) maintenance schedule of all stormwater quality treatment devices; b) record and reporting details; c) relevant contact information; and d) Work Health and Safety requirements 	Alexandria Park Community School Hydraulic Services Operations & Maintenance Manual (Asbuilt), Planet Plumbing, 04/09/20	The Operations and Maintenance Manual includes: <ul style="list-style-type: none"> - maintenance schedules; - record and reporting details; - relevant contact information; and - Work Health and Safety requirements 	Compliant
D18	Details demonstrating compliance must be submitted to the Certifying Authority prior to occupation.	Alexandria Park Community School Hydraulic Services Operations & Maintenance Manual (Asbuilt), Planet Plumbing, 04/09/20	The Certifier has verified acceptance of D17 submission.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Email RCC to Certifier (and response), 02/09/20 and 08/09/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20		
Rainwater Harvesting				
D19	A signed works-as-executed Rainwater Re-use Plan must be provided to the Certifying Authority prior to occupation of the building.	Works as Executed Plans, Planet Plumbing, 16/09/20 Email RCC to Certifier, 16/09/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	The works-as-executed Rainwater Re-use Plan was signed and submitted to the Certifier.	Compliant
Outdoor Lighting				
D20	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: a) comply with the latest version of AS 4282-1997 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and 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. 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.	Installation Certificate, Pro Electrical, 11/06/20 Email Certifier to RCC, 26/08/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	The installation certificate confirms compliance with this condition and the standards and requirement within. The Certifier provided acceptance.	Compliant
Warm Water Systems and Cooling Systems				
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.	Installation Certificate Mechanical Water Cooling Water Systems, ARA Mechanical, 31/08/20	The installation certificate confirms compliance with this condition and the standards and requirement within. The Certifier provided acceptance.	Compliant
Signage				
D22	Way-finding signage and signage identifying the location of staff car parking must be installed prior to occupation.	Signage photo series IMG2299 – 2814 Installation certificate 18/09/20	Signage identifying the location of staff car parking and bicycle facilities and non-potable water. No issues.	Compliant
D23	Bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas prior to occupation.	Signage photo series IMG2299 – 2814 Installation certificate 18/09/20	Signage identifying the location of staff car parking and bicycle facilities and non-potable water. No issues.	Compliant
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.	Signage photo series IMG2299 – 2814 Installation certificate 18/09/20	Signage identifying the location of staff car parking and bicycle facilities and non-potable water. No issues.	Compliant
Operational Waste Management Plan				
D25	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: a) detail the type and quantity of waste to be generated during operation of the development; 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	Operational Waste Management Plan, Foresight Environmental, 12/09/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	The Operational Waste Management Plan was prepared and submitted to the Certifier. It addresses:	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>(Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009);</p> <p>c) detail the materials to be reused or recycled, either on or off site; and</p> <p>d) include the Management and Mitigation Measures included in RtS</p>		<ul style="list-style-type: none"> - a) type and quantity of waste to be generated during operation of the development is presented in section 2; - b) handling, storage and collection of all waste streams generated on site is in section 4, 5 and 6; - c) the materials to be reused or recycled, either on or off site; and - d) Management and Mitigation Measures included in same plan prepared as part of the RtS are included in Section 6 and 8 <p>Observation: The Operational Waste Management Plan identifies collection (i.e.: commercial waste transporter collection), not disposal at destination. The Operational Waste Management Plan identifies general classifications from typical commercial facilities or that defined by commercial waste operators rather than any specific classifications from the Waste Classification Guidelines. Whilst not necessarily inconsistent with the relevant legislation and subordinate guidelines, the Operational Waste Management Plan does not reference the POEO Act, Waste Regulation or Waste Classification Guidelines.</p>	
Validation Report				
D26	<p>The Applicant must prepare a Validation Report for the development. The Validation Report must:</p> <ul style="list-style-type: none"> a) be prepared by an appropriately qualified environmental consultant and reviewed by an EPA accredited Site Auditor; b) be submitted to EPA, the Planning Secretary and the Certifying Authority for information one month after the completion of remediation works; 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); d) include, but not be limited to: <ul style="list-style-type: none"> i. comment on the extent and nature of the remediation undertaken; ii. describe the location, nature and extent of any remaining contamination on site; 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; iv. results of any validation sampling, compared to relevant guidelines/criteria; v. discussion of the suitability the remediated areas for the intended land use; and vi. any other requirement relevant to the project 	<p>Validation Report, Coffey, 16/09/20</p> <p>Post approval portal lodgment, 28/09/20</p> <p>Email RCC to Certifier, 16/09/20</p> <p>Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20</p> <p>Site Audit Statement, SAS148-1, ZOIC</p> <p>Site Audit Report, ZOIC, 18/09/20</p> <p>EPA automated response to submission 17/11/20.</p>	<p>Remediation works were completed at the end of landscaping (which comprises installing capping and marker layers) in September 2020.</p> <p>The Validation Report was prepared by the Project contaminations consultants. The report identifies investigation results, remediation undertaken, validation results and suitability for future use subject to implementation of an LTEMP (to manage the presence of asbestos below the capping and maker layers).</p> <p>The Validation Report was submitted to the Department on 28/09/20. The Certifier confirmed acceptance via issue of the Crown Completion Certificate.</p> <p>The Contaminated Sites Auditor reviewed the Validation Report and accepted the information provided. The Site Audit Statement and Site Audit Report verified the findings from the Validation Report and deemed the site to be fit for its intended use (subject to implementation of the LTEMP which forms part of the Site Audit Statement).</p> <p>Non-compliance: The auditees were of the understanding that the Contaminated Sites Auditor submitted the validation report to the EPA. On 14/11/20 the Contaminated Sites</p>	Non-compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			Auditor advised the Project that it is the Applicant who has to send the Validation Report to the EPA. The Validation Report was not issued to the EPA until 17/11/20, more than one month after completion of remediation works.	
Site Audit Report and Site Audit Statement				
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).	Site Audit Statement, SAS148-1, ZOIC Site Audit Report, ZOIC, 18/09/20	The Contaminated Sites Auditor reviewed the Validation Report and accepted the information provided. The Site Audit Statement and Site Audit Report verified the findings from the Validation Report and deemed the site to be fit for its intended use (subject to implementation of the LTEMP which forms part of the Site Audit Statement).	Compliant
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).	Site Audit Statement, SAS148-1, ZOIC Site Audit Report, ZOIC, 18/09/20 Email Zoic to RCC, 18/09/20	The Contaminated Sites Auditor confirmed lodgment with the EPA on 18/09/20	Compliant
Landscaping				
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.	Context Landscape Management Plan 27/6/19. Landscape Management Plan, Landscape Solution, September 2020 Landscape Installation Certificate, Landscape Solutions, 17/09/20 Email, Context to RCC, 16/11/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	The landscapers provided written confirmation of completion of the landscape works for phase 1 as set out in the CoC B38 Landscape Management Plan. This was also verified as closed by the Certifier through issuance of the Interim Crown Completion Certificate.	Compliant
Ecologically Sustainable Development				
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	Post approval portal lodgment, 08/07/20	Term 4 was the first day of operations, which was 12/10/20.	Not triggered
PART E POST OCCUPATION				
Operation of Plant and Equipment				
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.	Mechanical plant Operation and Maintenance Manual, ARA Mechanical, 17/09/20 Electrical plant and equipment Operation and Maintenance Manual, Pro Electrical (no date) Hydraulic services Operation and Maintenance Manual, Planet Plumbing, 04/09/20 Lift services Operation and Maintenance Manual, OTIS, 31N10517-9	Operation commenced approx 4 weeks prior to the audit. Operation and Maintenance Manuals have been prepared for all plant and equipment on site to assist in proper operation and maintenance.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Community Communication Strategy				
E2	<p>The Community Communication Strategy, as approved by the Planning Secretary, must be implemented for a minimum of 12 months following the completion of construction.</p>	<p>2/4/19 APCS CCS, Dept Ed.</p> <p>https://www.schoolinfrastructure.nsw.gov.au/project/s/a/alexandria-park-community-school.html#category-reports</p> <p>Website https://www.schoolinfrastructure.nsw.gov.au/project/s/a/alexandria-park-community-school.html</p> <p>Project works letterbox drops 10/08/20, 02/07/20</p> <p>RCC to APCS, 30/10/20</p>	<p>Consistent with the Communications Strategy, the Project has demonstrated ongoing consultation with the school, the Department, and nearby properties as required. This includes:</p> <ul style="list-style-type: none"> - submission of disruption notices (which include dates and times of works, what the works involve and endorsement from the schools of the disrupting works) - submission of documents to the Department (as referred to elsewhere in this audit table) - project updates and letterbox drops to surrounding receivers and on the website. 	Compliant
Out of Hours Event Management Plan				
E3	<p>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:</p> <ol style="list-style-type: none"> the number of attendees, time and duration; arrival and departure times and modes of transport; where relevant, a schedule of all annual events; demonstrate measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport); measures to minimise localised traffic and parking impacts; and include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan. <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>	Interview with auditees 11/11/20	There are no events of this size planned. The OOHEMP has not yet been prepared.	Not triggered
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> <ol style="list-style-type: none"> the number of attendees, time and duration; arrival and departure times and modes of transport; where relevant, a schedule of all annual events; demonstrate measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport); measures to minimise localised traffic and parking impacts; and include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan. <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>	Interview with auditees 11/11/20	There are no events of this size planned. The OOHEMP has not yet been prepared.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Operational Noise Limits				
E5	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 the report titled Alexandria Park Community School Development Application Acoustic Assessment, prepared by Wilkinson Murray and dated 19 April 2018.	Interview with auditees 11/11/20 Post approval portal lodgment, 08/07/20	Term 4 was the first day of operations, which was 12/10/20. Commencement of operations occurred approximately 4 weeks prior to the audit. Verification of noise emissions from operational plant and equipment is scheduled to occur in the coming weeks.	Not triggered
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.	Interview with auditees 11/11/20 Post approval portal lodgment, 08/07/20	Term 4 was the first day of operations, which was 12/10/20. Commencement of operations occurred approximately 4 weeks prior to the audit. Verification of noise emissions from operational plant and equipment is scheduled to occur in the coming weeks.	Not triggered
After Hours Use of Outdoor Sports Courts and Playing Fields				
E7	The use of the outdoor sports courts and playing fields is restricted as follows: a) between 7:00 am and 10:00 pm, Mondays to Fridays for training and social recreation activities; b) between 8:00 am to 6:00 pm, Saturdays and Sundays for organised events and competitions; and c) no organised events on public holidays.	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20 Site inspection 11/11/20	These facilities are being developed as part of phase 2 and are yet to be constructed.	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.	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20 Site inspection 11/11/20	These facilities are being developed as part of phase 2 and are yet to be constructed.	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.	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20 Site inspection 11/11/20	These facilities are being developed as part of phase 2 and are yet to be constructed.	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 operation of the outdoor sports courts and playing fields revert to the hours as detailed in condition E7.	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20 DPIE approval of Staging Report, 25/08/20 Site inspection 11/11/20	These facilities are being developed as part of phase 2 and are yet to be constructed.	Not triggered
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	Construction & Operation Phasing (Staging) Report Alexandria Park Community School SSD-8373, Urbis, 11/08/20	These facilities are being developed as part of phase 2 and are yet to be constructed.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	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.	DPIE approval of Staging Report, 25/08/20 Site inspection 11/11/20		
Unobstructed Driveways and Parking Areas				
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.	Site inspection 11/11/20	No obstruction of driveways and parking areas associated with operation of the school.	Compliant
Green Travel Plan				
E13	The Green Travel Plan required by condition D9 of this consent must be updated annually and implemented.	Post approval portal lodgment, 08/07/20	Term 4 was the first day of operations, which was 12/10/20.	Not triggered
Outdoor Lighting				
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.	Installation Certificate, Pro Electrical, 11/06/20 Email Certifier to RCC, 26/08/20 Interim Crown Completion Certificate BCAC-20136 (phase 1), 09/10/20	The installation certificate confirms compliance with this condition and the standards and requirement within. The Certifier provided acceptance. There was one complaint in relation to internal lighting (not external) that was left on overnight. This was rectified by turning the internal lighting off.	Not triggered
Fire Safety Certificate				
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.	Post approval portal lodgment, 08/07/20	Term 4 was the first day of operations, which was 12/10/20.	Not triggered
Landscaping				
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.	Post approval portal lodgment, 08/07/20	Term 4 was the first day of operations, which was 12/10/20. Landscaping is brand new.	Not triggered

APPENDIX B – PLANNING SECRETARY AGREEMENT OF INDEPENDENT AUDITORS



**Planning &
Environment**

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Email: 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
AI/ Principal Compliance Officer (Social Infrastructure)
As nominee of the Secretary

APPENDIX C – CONSULTATION RECORDS

From: Laura Papoulias <Laura.Papoulias@planning.nsw.gov.au>
Sent: Tuesday, 10 November 2020 2:58 PM
To: Derek Low
Subject: Independent Audit of Alexandria Park Community School Redevelopment (SSD 8373)

Hi Derek,

Thank you for your email. In response to your queries regarding the audit proposed to be undertaken on 11 November 2020:

- If it any key issues it would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR
- Out of hours works
- Compliance with archaeological requirements
- Provision of play space per student was an assessment issue, however revised staging and amended plans were approved in a modification. As such, please also check if/how the revised staging / design has been incorporated into project management.

-If it recommends that other parties or agencies are to be consulted. If so I request that the Department identify those parties

- Please consult with any parties or agencies required under the Approval.

If you have any enquiries, please do not hesitate to contact me.

Kind regards,

Laura Papoulias
Compliance Officer

Planning & Assessment | Department of Planning, Industry and Environment
T 02 8289 6879 | M 0477 977 069 | E Laura.Papoulias@planning.nsw.gov.au
Locked Bag 5022 | PARRAMATTA NSW 2124
Please direct all email correspondence to compliance@planning.nsw.gov.au
www.dpie.nsw.gov.au



**Planning,
Industry &
Environment**

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

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

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

From: Derek Low <dlow@wolfpeak.com.au>
Sent: Wednesday, 4 November 2020 7:47 AM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Subject: Independent Audit of Alexandria Park Community School Redevelopment (SSD 8373)

Good morning,

I am one of the approved independent auditors on the Alexandria Park Community School Redevelopment (SSD 8373).

We are currently preparing to undertake the fourth independent audit on the Project. The audit is required to be conducted in accordance with SSD 8373 condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (or IAPAR). The proponent has elected to adopt the 2020 revision of the IAPAR and, as such, the 2020 revision will be applied to the audit process.

The consent is available at the following link: <https://www.planningportal.nsw.gov.au/major-projects/project/31021>
The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>

The on-site component of the audit is scheduled to commence on 11 November 2020 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the IAPAR, I am consulting with the Department on the scope of the audit and for confirmation as to whether other parties or agencies are to be consulted.

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. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request Department confirm:

- if it any key issues it would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR; or
- if it recommends that other parties or agencies are to be consulted. If so I request that the Department identify those parties.

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


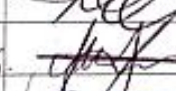

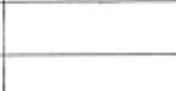



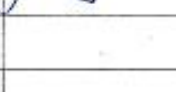
Kind regards

Derek Low
Principal Environmental Consultant



APPENDIX D – MEETING SIGN ON SHEET

INDEPENDENT AUDIT MEETING ATTENDANCE RECORD

PROJECT (NAME AND APPROVAL NUMBER)	ALEXANDRIA PSSE Cam Wood 8593		
DATE	11/11/20		
LOCATION	ALEXANDRIA		
OPENING MEETING			
NAME	POSITION / TITLE	ORGANISATION	SIGNATURE
KEEL LAU	AUDITOR	WOLFPEAK	
Nicholas Clay	Project Manager	Sauills	
RENE SCARVIER	Project Manager	RICHARD CROOKES	
Sheron Musengi	Site Engineer	Richard Crookes	
CLOSING MEETING			
NAME	POSITION / TITLE	ORGANISATION	SIGNATURE
KEEL LAU	AUDITOR	WOLFPEAK	
Nicholas Clay	Project Manager	Sauills	
Sheron Musengi	Site Engineer	Richard Crookes	
RENE SCARVIER	Project Manager	RCC	

APPENDIX E – SITE INSPECTION PHOTOGRAPHS



Photo 1: Completed Phase 1.



Photo 2: Removal of pop up school prior to commencement of construction of Phase 2.



Photo 3: Removal of pop up school prior to commencement of construction of Phase 2.

Project: 1161 Alexandria Park Community School
Address: 7-11 Park Road, Alexandria, 2015
Ref: SSD 8373

RICHARD CROOKES
CONSTRUCTIONS

SSDA KEYNOTIFICATION & REPORTING

In the event of breach or suspected non compliance with the following SSD conditions of consent, please ensure the below site specific contacts are notified and advised of circumstances leading to potential breach or non-compliance. All notifications and evidence of contact to be recorded formally.

- A28. The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au 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.
- A29. Subsequent notification must be given and reports submitted in accordance with the requirements set out in **Appendix 1**.
- C4. Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:
 - (a) between 7am and 6pm, 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.
- C5. Construction activities may be undertaken outside of the hours in condition C4 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 his nominee if appropriate justification is provided for the works.
- C6. Notification of such construction activities as referenced in condition C5 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.
- C7. Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:
 - (a) 9am to 12pm, Monday to Friday;
 - (b) 2pm to 5pm Monday to Friday; and
 - (c) 9am to 12pm, Saturday.
- C13. The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C4.
- C28. If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and the Heritage NSW 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 the Heritage NSW.

CONTACTS TO BE NOTIFIED

COMPANY: RCC	NAME: ANDREW BUCHANAN	PH: 0403 060 021	ROLE: PROJECT DIRECTOR
COMPANY: RCC	NAME: TRENT SCRIVENER	PH: 0481 465 597	ROLE: PROJECT MANAGER
COMPANY: SINISW	NAME: ROBERT CRESTANI	PH:	ROLE: PROJECT DIRECTOR
COMPANY: SAVILLS	NAME: NICHOLAS CLAY	PH: 0418 203 824	ROLE: PROJECT MANAGER

Photo 4: Toolbox talk on noise and hours of work



Photo 5: Site signage for removal of pop-up school.



Photo 6: Site access free of material

APPENDIX F – DECLARATIONS

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	27/11/20

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:

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

Name of auditor	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

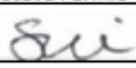
Project name	Alexandria Park Community School
Consent Number	8373
Description of Project	Redevelopment and operation of Alexandria Park Community School
Project Address	7 – 11 Park Road, Alexandria, NSW 2015
Proponent	NSW Department of Education
Title of Audit	Independent Audit
Date	27/11/20

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.

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- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of auditor	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