



ARMIDALE HIGH SCHOOL – SSD 9095

**INDEPENDENT AUDIT REPORT**

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Revision	Date	Prepared By	Reviewed By	Description
V0	16/07/19	S Fermio	Client	Factual information & response to findings review
V1	28/7/19	S Fermio	D Low	FINAL REPORT
V2	17/9/19	S Fermio	D Low	Revised in response to DPIE comments

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<b>Date</b>	17/9/19	<b>Date</b>	17/9/19

## Executive Summary

The NSW Department of Education – Schools Infrastructure NSW (SINSW) is responsible for delivering the Armidale High School Redevelopment (the Project). The Project involves an upgrade to the school to accommodate a total of up to 1,580 students and up to 110 full-time equivalent staff.

Consent to the Project was granted on 29 May 2019 under section 4.38 of the *Environmental Planning and Assessment Act 1979* (SSD 9095) subject to a number of conditions of consent (CoC). The notified date of commencement of construction was 1 June 2019.

The objective of this Independent Audit is to satisfy SSD 9095 Schedule 2, CoC C41. It requires that Independent Audits of the development be carried out in accordance with Project's Independent Audit Program and the *Independent Audit Post Approval Requirements* (Department 2018). The Independent Audit seeks to verify compliance with the relevant CoCs and assess the effectiveness of environmental management on the Project.

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

GHD have been appointed as the client representative on behalf of SINSW. Richard Crookes Constructions are the principal contractor. Demolition works were commenced in February 2019 (under a separate Review of Environmental Factors) and have been largely completed. Main construction works covered under SSD 9095 began on 1 June 2019. Works undertaken to date include:

- Demolition and remediation work
- Bulk earthworks
- Brickwork and concrete crushed and recycled for reuse in temporary internal roads and retaining walls
- Inground services and foundation works
- Ground floor slab pours have commenced
- Works to the heritage building are continuing with roof replacement and internal refurbishment commenced.

The overall outcome of the Independent Audit was positive. Compliance records were well organised and available at the time of the site inspection and interview with SINSW, GHD and Richard Crookes personnel on 9 July 2019. Relevant environmental and compliance monitoring records are being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements.

There were 117 CoCs and 21 CEMP and Sub-plan mitigation measures assessed. Six non-compliances were identified against the CoCs<sup>1</sup>.

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<sup>1</sup> Two of these non-compliances relate to the same incident triggering non-compliances under two separate conditions that impose similar requirements

There were two observations identified in relation to the CoCs and the Construction Soil and Water Management Sub-Plan. Neither of these observations were considered to be non-compliances.

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

The overall outcome of the Independent Audit was indicative of a commitment to compliance and environmental performance by SINSW, GHD and Richard Crookes Constructions. The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the Independent Audit.

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## 1. Introduction

### 1.1 The Project

Armidale High School (AHS) is situated within the Armidale Regional Council Local Government Area in the NSW Northern Tablelands. The site is located at 185-182 Butler Street, approximately 1km south west of the Armidale Town Centre. The project location is presented in Figure 1.



**Figure 1:** Project location (Source: modified from Google Earth and SSD 9095 Assessment Report, Department of Planning and Environment, 2019)

The AHS redevelopment project (the Project) involves an upgrade to the school to accommodate a total of up to 1,580 students and up to 110 full-time equivalent staff. The Project comprises:

- Construction of three new buildings consisting of two and three storeys in height linked by an undercroft
- A single-storey addition to the gymnasium
- Consolidation of agricultural facilities in a new building
- Alterations and additions to the existing car parking areas
- Landscaping works and installation of new utilities, drainage and communications infrastructure
- Operation of the upgraded school.

Demolition of former school buildings has been undertaken through a separate approval pathway. The proposed school would accommodate students and staff from the existing AHS (currently

decamped to Duval High School) and from Duval High School and would become Armidale Secondary College.

The Project was granted consent under Section 4.38 of the *Environmental Planning and Assessment Act 1979* on 29 May 2019 (State Significant Development 9095) subject to a number of conditions. The notified date of commencement of construction was 1 June 2019.

## 1.2 Approval requirements

Conditions of Consent (CoC) C38 – C43 of Schedule 2 of SSD 9095 set out the requirements for undertaking Independent Audits (IAs or audits). The CoCs give effect to the Department's *Independent Audit Guideline Post Approval Requirements*, 2018 (IAPAR).

## 1.3 The audit team

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

The Audit Team comprises:

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

Approval of the Audit Team was provided by the Department on 7 June 2019. The letter is presented in Appendix C.

## 1.4 The objectives of the audit

The objective of this IA is to satisfy SSD 9095 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 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. The IA Program (and CoC C40) specifies that the first IA must be undertaken within eight weeks of the notified commencement date of construction.

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



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

### 1.5 The audit scope

This IA relates to the Project works from the granting of consent (29 May 2019) through to July 2019.

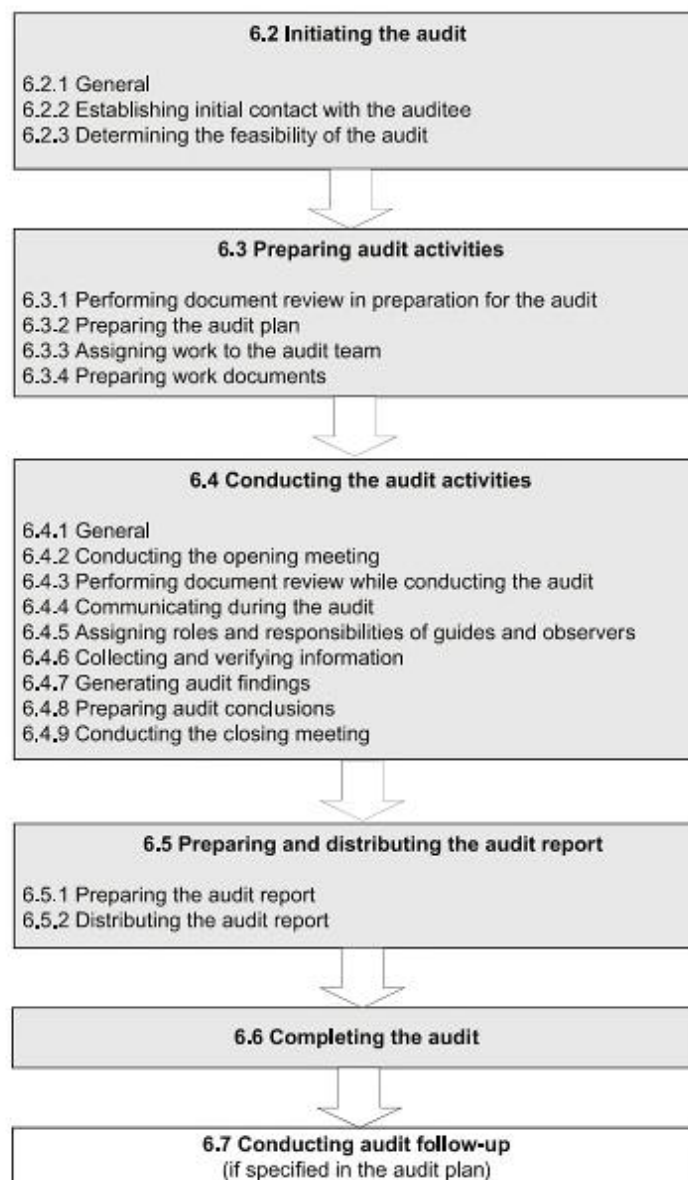
The scope of the IA comprises:

- an assessment of:
  - CoCs applicable to the phase of the development that is being audited
  - post approval documents prepared to satisfy the CoCs, including an assessment of the implementation of Environmental Management Plans and Sub-plans
  - all environmental licences and approvals applicable to the development (excluding environmental protection licences issued under the *Protection of the Environment Operations Act 1997*).
- an assessment of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - actual impacts compared to predicted impacts documented in the environmental impact assessment.
  - the physical extent of the development in comparison with the approved boundary, and any potential off-site impacts
  - incidents, non-compliances and complaints that occurred or were made during the audit period
  - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
  - feedback received from the Department, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period
- a review of the status of implementation of previous Independent Audit findings, recommendations and actions (if any)
- a high-level review of the project's environmental management systems, including assessment of any third-party certification of them, the type, nature and scope of the systems having regard to the nature and scale of the development, and the implementation of the systems.
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- details of any other matters considered relevant by the Auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

## 2. Audit methodology

### 2.1 Audit process

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



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

### 2.1.1 Audit initiation and scope development

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

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

On 2 July 2019 WolfPeak consulted with the Department, Transport for NSW, the Office of Environment and Heritage, the Environment Protection Authority and Armidale Regional Council, to obtain their input into the scope of the IA in accordance with Section 3.2 of the IAPAR. The consultation records are presented in Appendix D.

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

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

Stakeholder	Issues and areas of focus	How addressed
Department of Planning and Environment	No issues identified	NA
Transport for NSW	No response	NA
Office of Environment and Heritage	<p>We have no particular comment as the heritage conditions in this consent are standard unexpected finds conditions.</p> <p>However, in general terms, when considering unexpected finds protocols for historical archaeology it is important that the procedure makes reference to s146 of the <i>Heritage Act 1977</i> (notification of discovery of relics). Further, if your audit finds that relics have been discovered then it is important that the proponent has notified the Heritage Council of NSW.</p>	NA
Environment Protection Authority	<p>EPA North Branch has previously provided comments on this EIS during November 2018 (refer to DOC18/922247). EPA's recommendations was that '<i>Consideration may also be given to engaging an EPA accredited site auditor.</i>' Further information regarding our site auditor program is available at: <a href="https://www.epa.nsw.gov.au/your-environment/contaminated-land/site-auditor-scheme">https://www.epa.nsw.gov.au/your-environment/contaminated-land/site-auditor-scheme</a>.</p>	<p>Noted.</p> <p>There are no CoCs requiring the appointment of an accredited site auditor.</p>
	The development consent conditions relevant to contaminated land matters are Conditions B7 and B20 which pertain to preparation of an unexpected	Noted.

Stakeholder	Issues and areas of focus	How addressed
	<p>finds protocol (Condition #B7) and its incorporation into the CEMP (Condition B20).</p> <p>Normally, the content of this unexpected finds protocol is reviewed by an <b>EPA accredited site auditor</b> rather than by a DPE approved independent auditor. Please Note that Independent auditors are different from site auditors accredited by the NSW EPA under the <i>Contaminated Land Management Act</i>.</p>	<p>Refer above.</p> <p>The scope of this Audit includes implementation of the unexpected finds protocol.</p>
	Site auditors accredited under the CLM Act are on web page <a href="https://www.epa.nsw.gov.au/your-environment/contaminated-land/site-auditor-scheme/accredited-site-auditors">https://www.epa.nsw.gov.au/your-environment/contaminated-land/site-auditor-scheme/accredited-site-auditors</a>	Noted
	This site doesn't come up as a CLM regulated or notified site database.	Noted
	The site does not hold an Environment Protection Licence (EPL). The EPA's regulatory role is only as ARA for public authority.	Noted
	Confirmation of appropriate waste classification, treatment, disposal pathways and documentation that ALL waste is being taken to a lawful facility. Particularly the asbestos waste taken to Qld is being tracked appropriately.	This Audit has reviewed the implementation of the Construction Waste Management Plan for the Project
Armidale Regional Council	No response	NA

### 2.1.2 Preparing audit activities

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

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

- *Environmental Impact Statement, State Significant Development Armidale Secondary College 158-182 Butler Street, Armidale, DFP Planning Consultants, November 2018 (the EIS)*
- *Development Consent SSD 9095, 29 May 2019 (the Consent)*
- *Armidale Secondary College No:1155 Environmental Management Plan (EMP) & Construction Environmental Management Plan (CEMP), Richard Crookes Constructions, 30 May 2019 (the CEMP)*
- *Armidale Secondary College 1155 Community Consultation and Engagement Plan, Richard Crookes Constructions, 5 February 2019 (the Community Consultation Strategy, or CCS)*

- *Construction Traffic & Pedestrian Management Sub-Plan Armidale Secondary College*, TTM Consulting, 3 June 2019 (Construction Traffic and Pedestrian Management Sub-Plan, or CTPMSP)
- *Construction Noise & Vibration Management Plan Redevelopment of Armidale Secondary College Butler Street, Armidale, NSW*, Day Design Pty Ltd, 7 June 2019 (Construction Noise and Vibration Management Sub-Plan, or CNVMSP)
- *Waste and Recycling Management Plan Armidale Secondary College Armidale NSW*, MEtech Consulting, 30 May 2019 (the Construction Waste Management Sub-Plan, or CWMSP)
- *Armidale Secondary College 1155 Asbestos Management Plan*, Richard Crookes Constructions, 5 February 2019
- *Construction Soil and Water Management Report Armidale Secondary College Armidale NSW*, Birzulis Associates Pty Ltd, 27 May 2019 (Construction Soil and Water Management Sub-Plan, CSWMP)
- *Unexpected Finds Procedure (Asbestos) Armidale High School*, SERS, 1 May 2019
- *Armidale College Upgrade Archaeological Watching Brief*, Apex Archaeology, February 2019
- *Remedial Action Plan for Redevelopment Works, Armidale High School Butler Street, Armidale NSW 2350*, WSP, September 2018

Audit checklists were reviewed and prepared. These comprised:

- Schedule 2 of SSD 9095 CoCs
- Select environmental management and mitigation measures as set out in the Project's CEMP, Sub-plans and CCS.

### **2.1.3 Site personnel involvement**

The on-site audit activities took place on 9 July 2019. The following personnel took part in the audit:

- Steve Fermio – Auditor (WolfPeak)
- Joel Davie – Project Manager (RCC)
- Sam Lyons – Site Engineer (RCC)
- Mitchell McManus – Site Manager (RCC)
- Harry Los'e – WHS Coordinator (RCC)
- Roger Lee – Assistant Project Manager (GHD)
- Tyler Kratzer – Project Officer (SINSW).

## Meetings

Opening and closing meetings were held with the Auditor and Project personnel listed above on 9 July 2019.

During the opening meeting the objectives and scope of the IA, the resources required and methodology to be applied were discussed. At the closing meeting, preliminary audit findings were presented, additional information needed was identified and timeframes for completion of the audit report confirmed.

## Interviews

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

### 2.1.4 Site inspection

The on-site audit activities took place on 9 July 2019. The on-site audit activities included an inspection of the site and work activities being undertaken at the time. Photos are presented in Appendix F.

### 2.1.5 Document review

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

### 2.1.6 Generating audit findings

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

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

## Compliance evaluation

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

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

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

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

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

The Auditor assessed whether post approval documents:

- have been developed in accordance with the CoCs (there are no other environmental licences or approvals applicable to the Project) and their content is adequate; and
- have been implemented in accordance with the CoCs.

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; and
- whether there are any opportunities for improvement.

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

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

### 3. Audit findings

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

The documents audited comprised all the conditions from Schedule 2 of SSD 9095 applicable to the works being undertaken, and selected mitigation measures and commitments from the following plans:

- Community Consultation Strategy (CCS)
- Construction Environmental Management Plan (CEMP)
- Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP)
- Construction Noise and Vibration Management Sub-Plan (CNVMSP)
- Construction Waste Management Sub-Plan (CWMSP)
- Construction Soil and Water Management Sub-Plan (CSWMP).

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

#### 3.2 Compliance Status

This Section presents the findings of the July 2019 IA.

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

##### 3.2.1 Summary

There were 117 CoCs and 21 CEMP and Sub-plan mitigation measures assessed.

Six non-compliances were identified against the CoCs.

There were two observations made against a compliant CoC and a non-conformance with one of the mitigation measures in a section of the CSWMP.

##### 3.2.2 Details

###### Non-compliance against CoC A23

CoC A23 requires that, from at least 48 hours before the commencement of construction until the completion of all works under the consent, the proponent must make specified information and documents relating to the Project publicly available on its website. The website must be kept up to date.

At the time of the site inspection on 9 July 2019, the website did not make available the approved CEMP and up to date Complaints Register as required by CoC A23(a)(iii) and (viii) respectively.



### **Non-compliance against CoC B7**

CoC B7 requires, prior to the commencement of construction, the proponent must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. That procedure must form part 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.

At the time of the inspection on 9 July 2019, the auditor was made aware of several loads of contaminated material having been disposed to landfill on various dates in May and June 2019, information about which was not submitted to the Planning Secretary in accordance with the requirements of CoC B7. Details of the disposal of this material was retrospectively advised to the Planning Secretary on 16 July 2019.

### **Non-compliance against CoC C5**

CoC C5 requires that 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 8am and 1pm, Saturdays.

No work may be carried out on Sundays or public holidays

A complaint recorded in the complaints register dated 13 June indicated that a delivery of material to site occurred prior to 7am on this date. The truck involved was immediately demobilised and returned to its depot. A non-conformance was raised with the delivery sub-contractor via the Project's contract management system process.

### **Non-compliance against CoC C16**

CoC C16 requires 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 C5. As per CoC 5 above the complaint received on 13 June indicates that this requirement was not met. A non-conformance was raised with the delivery sub-contractor via the Project's contract management system process.

### **Non-compliance in relation to CoC C25**

CoC C25 requires that during construction, among other things, trucks associated with the development do not track dirt onto the public road network and that public roads used by these trucks are kept clean. During the site inspection tracking of dirt from Gates 1 and 2 onto Butler Street was observed (Plates 1 & 2).

Subsequent to the audit the following photos were provided by the auditee demonstrating cleaning of Butler Street.



### **Non-compliance in relation to CoC C32**

CoC C32 requires that waste be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties. During the site inspection litter was noted in places throughout site (Plates 4 & 5). In response the Project team has focused on reducing litter across the site and provided more bins. Toolbox Talk given on 24 July included housekeeping issues.

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

There were two observations identified in relation to the CoC and the CSWMSP.

#### **Observation in relation to CoC C27**

CoC C27 requires that 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. During the site inspection maintenance issues were noted around the base of large soil stockpile where soil boulders had rolled over silt fence (Plate 3) (this was being addressed at the time of the inspection however). A documented record of erosion and sediment controls (e.g. plan or map) and in particular any changes to these over time is recommended as an observation from this audit. The changes to the original approved erosion and sediment control plan can be marked up by hand if needed.



Following the audit, the following photos were provided by the auditee demonstrating maintenance of the erosion and sediment controls had been satisfactorily completed.



### **Observation in relation to CSWMP Sections 6.2.**

Implementation of erosion and sediment controls within the site was generally appropriate and provided evidence of the implementation of the CSWMP.

Section 6.2 of the CSWMP requires, as one of the specific mitigation measures, that any fuel, oil or other liquids stored onsite would be stored in an appropriately sized impervious bunded area.

During the site inspection while the storage of waste oil, fuels and chemicals was observed within appropriately bunded containers there was some minor storage of such materials noted outside designated bunded storage areas (Plates 6 & 7).

### **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

- CCS
- CEMP
- CTPMSP
- CNVMSP
- CWMSMP
- CSWMSP.

The documents are generally adequate, other than the implementation matters identified in Sections 3.2.2 and 3.2.3.

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

RCC operates under its own environmental management system developed to the requirements and guidelines of the AS/NZS ISO 14001:2016 Environmental Management Systems. In carrying out the audit, it was evident that the elements of AS/NZ ISO 14001:2016 Environmental Management Systems are being implemented through the CEMP and Sub Plans for the Project. Evidence to support this include the documents sighted during the audit (detailed in Appendices A and B) and controls observed in the field.

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

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

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

There are no other specific items to raise at this stage as a result of the audit.

#### 3.6.1 Issues raised by stakeholders during consultation on the audit scope

Issues raised by stakeholders during consultation on the audit scope and how these have been addressed are identified in Table 1 above. The issues raised were of a generic nature and did not result in any specific areas of focus for the audit itself.

### 3.7 Complaints

A complaints register is being maintained by the Project. The register is published on the Project website at

[https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/a/armidale-secondary-college/ASC Complaints Register - May 2019.pdf](https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/a/armidale-secondary-college/ASC_Complaints_Register_-_May_2019.pdf)

At the time of the site audit on 9 July, no complaints were recorded on the public complaints register available on the project's website. However, the complaints register provided to the independent auditor included one complaint dated 13 June 2019. This is not compliant with the requirements of CoC A23(a)(viii) which requires a complaints register to be made publicly available and be updated monthly.

### 3.8 Incidents

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

### 3.9 Actual versus predicted impacts

The audit considered the actual impacts arising from the carrying out of the Project and whether they are consistent with the relevant impacts predicted in the EIS. A summary of the assessment is presented in Table 2.

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

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
Physical extent of the development in comparison with the approved boundary and any potential off-site impacts	The approved Project boundary is defined within the stamped plans listed under CoC A2.	The construction boundary is situated well inside the approved Project boundary	Y
Biodiversity	A total of 44 trees are to be removed as part of the Project. The Project does not have any Serious and Irreversible	Project team has confirmed no additional trees are to be removed.	Y

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
	Impacts, and there are no impacts within the Development Site that require offset for native vegetation. No ecosystem/species credits are required for the Project.	Tree protection measures observed around trees to be retained.	
Traffic and access	Minor and temporary disruptions to parking, traffic and access. No heavy vehicles to be parked beyond the Project boundaries.	No heavy vehicles observed to be parked on local streets. No complaints have been made regarding access issues to date	Y
Noise and vibration	Moderate short-term construction noise and vibration impacts on nearby receivers above the relevant Noise Management Levels and vibration criteria.	No complaints have been made regarding construction noise. Rock breaking is not required	Y
Soil and water	Minor and temporary impacts associated with construction erosion and sedimentation.	Some mud tracking offsite noted on day of site inspection. Minor impact which was cleaned up on the day with additional controls to be installed to further minimise impacts	Y
Heritage	Negligible impact on aboriginal heritage items.	No unexpected finds have been reported to date	Y
Contaminated land	There is no unacceptable risk associated with contamination and future land use, noting that asbestos containing materials and other hazardous materials are present or likely to be present and should be removed or further investigated.	Contaminated materials have been managed in accordance with the CWMP	Y
Flooding	Negligible flood risk	No flooding of site reported	Y
Waste	The construction of the Project would generate general demolition and construction waste, green waste, contaminated fill, excess soils and office waste	Demolition and green wastes are being reused on site. Some contaminated fill disposed of offsite in accordance with CWMP.	Y
Bushfire	The Project is subject to a low bushfire risk	Noted	Y

#### 4. Actions

Item	Cond No	Type	Details of item	Proposed or completed action by the auditee	By whom and by when	Status
<b>JULY 2019 AUDIT FINDINGS</b>						
<b>Conditions of Consent SSD 9095 Schedule 2</b>						
1	CoC A23	Non-compliance	<p>CoC A23 requires that, from at least 48 hours before the commencement of construction until the completion of all works under the consent, the proponent must make specified information and documents relating to the Project publicly available on its website. The website must be kept up to date.</p> <p>At the time of the site inspection on 9 July 2019, the website did not make available the specified documents and information required by CoC A23(a)(iii) and (viii).</p>	Project website has been updated to include all documents and information required under A23 on 24 July 2019.	SINSW	Closed
2	CoC B7	Non-compliance	<p>CoC B7 requires, prior to the commencement of construction, the proponent must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. That procedure must form part of the of the CEMP in accordance with condition B20 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.</p> <p>At the inspection on 9 July 2019, the auditor was made aware that several loads of contaminated material had been disposed of to landfill, information about which was not submitted to the Planning Secretary in accordance with the requirements of CoC B7. Details subsequently provided as follows:</p> <ul style="list-style-type: none"> <li>Contaminated Topsoil Disposed to Swanbank Landfill on 18/5/19, 20/5/19, 21/5/19 and 22/5/19</li> <li>Contaminated Material Removal Request 2 - Soil West of Building B Disposed to Swanbank Landfill on 13/6/19, 14/6/19 and 20/6/19</li> <li>Contaminated Material Removal Request 3 - Ag Zone Disposed to Swanbank Landfill on 24/5/19, 25/6/19, 28/6/19 and 29/6/19</li> </ul>	Details of contaminated material and disposal site retrospectively advised to DPE by SINSW in letter dated 16 July 2019	SINSW	Closed



3	CoC C5	Non-compliance	<p>CoC C5 requires 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"> <li>(a) between 7am and 6pm, Mondays to Fridays inclusive; and</li> <li>(b) between 8am and 1pm, Saturdays.</li> </ul> <p>No work may be carried out on Sundays or public holidays</p> <p>A complaint recorded in the complaints register dated 13 June indicates that a delivery of material to site occurred prior to 7am on this date</p>	Communication to relevant sub-contractor via project management system (Aconex) advising them of no deliveries outside hours	Principal Contractor	Closed
4	CoC C16	Non-compliance	<p>CoC C16 requires 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 C5.</p> <p>As per CoC 5 above the complaint received on 13 June indicates that this requirement was not met</p>	Communication to relevant sub-contractor via project management system (Aconex) advising them of no deliveries outside hours	Principal Contractor	Closed
5	CoC C25	Non-compliance	<p>CoC C25 requires that during construction, the Applicant ensures that:</p> <ul style="list-style-type: none"> <li>(a) exposed surfaces and stockpiles are suppressed by regular watering;</li> <li>(b) all trucks entering or leaving the site with loads have their loads covered;</li> <li>(c) trucks associated with the development do not track dirt onto the public road network;</li> <li>(d) public roads used by these trucks are kept clean; and</li> <li>(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</li> </ul> <p><b>Note:</b> While items (a) (b) &amp; (e) were being implemented, mud tracking onto Butler Street was observed on the day of the site audit.</p>	<p>Sweeper to be deployed.</p> <p>Entry gates to be shut so vehicles can't use to exit</p> <p>Routine sweeper deployed.</p> <p>Rumble drains to be installed at light vehicle exit</p>	Principal Contractor. Rumble drain to be installed by 31 July 2019	Closed
6	CoC C32	Non-compliant	<p>CoC C32 requires that waste be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.</p> <p><b>Note:</b> Construction wastes generally well sorted into separate receptacles, however litter was noted in places throughout site (Plates 4 &amp; 5)</p>	Project team has focused on litter across the site and provided more bins. Toolbox Talk on 24 July included	Contractor. To be monitored and on a regular basis.	Closed





				housekeeping issues		
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## 5. Conclusions

The overall outcome of the IA was positive. The majority of compliance records were organised and available at the time of the site inspection and interview with Project personnel on 9 July 2019.

There were 117 CoCs and 21 CEMP and Sub-plan mitigation measures assessed. Six non-compliances were identified against the CoCs (two of these non-compliances relate to the same incident triggering non-compliances under two separate conditions that impose similar requirements).

There were two observations identified in relation to the CoCs and the Construction Soil and Water Management Sub-Plan (neither of these were considered to be non-compliances).

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

The overall outcome of the Independent Audit was indicative of a commitment to compliance and environmental performance by SINSW, GHD and Richard Crookes Constructions (RCC).

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

## 6. Limitations

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

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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.

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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 9095 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 provided below	Reasonable and feasible measures being implemented with some improvements to these noted below	C																																																																
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 Plans prepared by NBRS Architecture</th></tr><tr><th>Dwg No.</th><th>Rev</th><th>Name of Plan</th><th>Date</th></tr><tr><td>17352-NBRS-DA-082</td><td>3</td><td>Site Circulation, Vehicle and Pedestrian Plan</td><td>12/04/2019</td></tr><tr><td>17352-NBRS-DA-005</td><td>2</td><td>Building Envelope 3D</td><td>20/02/2019</td></tr><tr><td>17352-NBRS-DA-012</td><td>4</td><td>Proposed Site Plan</td><td>12/04/2019</td></tr><tr><td>17352-NBRS-DA-100</td><td>3</td><td>Site General Arrangement Plan – Lower Ground</td><td>20/02/2019</td></tr><tr><td>17352-NBRS-DA-101</td><td>4</td><td>Site General Arrangement Plan – Ground floor</td><td>20/02/2019</td></tr><tr><td>17352-NBRS-DA-102</td><td>3</td><td>Site General Arrangement Plan – Upper Ground</td><td>20/02/2019</td></tr><tr><td>17352-NBRS-DA-103</td><td>3</td><td>Site General Arrangement Plan – First Floor</td><td>20/02/2019</td></tr><tr><td>17352-NBRS-DA-104</td><td>3</td><td>Site General Arrangement Plan – Second Floor</td><td>20/02/2019</td></tr><tr><td>17352-NBRS-DA-105</td><td>2</td><td>Site Roof Plan</td><td>20/02/2019</td></tr><tr><td>17352-NBRS-DA-300</td><td>2</td><td>Elevations - Orthographic</td><td>20/02/2019</td></tr><tr><td>17352-NBRS-DA-301</td><td>2</td><td>Elevations and sections Zone 1 and O Block</td><td>20/02/2019</td></tr><tr><td>17352-NBRS-DA-400</td><td>2</td><td>Elevations and Site Sections</td><td>20/02/2019</td></tr><tr><td>17352-NBRS-DA-401</td><td>2</td><td>New Build Sections</td><td>20/02/2019</td></tr><tr><td>NBRS-AR-DWG-DA-1051</td><td>1</td><td>Site Signage Plan</td><td>12/04/2019</td></tr></table></div>	Architectural Plans prepared by NBRS Architecture				Dwg No.	Rev	Name of Plan	Date	17352-NBRS-DA-082	3	Site Circulation, Vehicle and Pedestrian Plan	12/04/2019	17352-NBRS-DA-005	2	Building Envelope 3D	20/02/2019	17352-NBRS-DA-012	4	Proposed Site Plan	12/04/2019	17352-NBRS-DA-100	3	Site General Arrangement Plan – Lower Ground	20/02/2019	17352-NBRS-DA-101	4	Site General Arrangement Plan – Ground floor	20/02/2019	17352-NBRS-DA-102	3	Site General Arrangement Plan – Upper Ground	20/02/2019	17352-NBRS-DA-103	3	Site General Arrangement Plan – First Floor	20/02/2019	17352-NBRS-DA-104	3	Site General Arrangement Plan – Second Floor	20/02/2019	17352-NBRS-DA-105	2	Site Roof Plan	20/02/2019	17352-NBRS-DA-300	2	Elevations - Orthographic	20/02/2019	17352-NBRS-DA-301	2	Elevations and sections Zone 1 and O Block	20/02/2019	17352-NBRS-DA-400	2	Elevations and Site Sections	20/02/2019	17352-NBRS-DA-401	2	New Build Sections	20/02/2019	NBRS-AR-DWG-DA-1051	1	Site Signage Plan	12/04/2019	<div>Approved plans stamped 29 May 2019</div> <div>Notice of Determination of Application Armidale High School (SSD-9095) dated 29 May 2019</div> <div>MBC is the CA Earthworks certificate issued 3 June</div> <div>Structural works certificate issued 28 June</div> <div>Southern carpark certificate issued 28 June</div>	These drawings are the plans being used for the development.	C
Architectural Plans prepared by NBRS Architecture																																																																				
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17352-NBRS-DA-082	3	Site Circulation, Vehicle and Pedestrian Plan	12/04/2019																																																																	
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Unique ID	Compliance requirement				Evidence collected	Independent Audit findings and recommendations	Compliance Status
	Landscape Plans prepared by <i>NBRS Architecture</i>						
	Dwg No.	Rev	Name of Plan	Date			
	17352-NBRS-L-002	Q	Landscape Demolition Plan	15/04/2019			
	17352-NBRS-L-003	O	Proposed Landscape Site Plan	15/04/2019			
	17352-NBRS-L-004	N	Proposed Landscape Detail Plan	15/04/2019			
	17352-NBRS-L-005	L	Landscaping Fencing Plan	15/04/2019			
	17352-NBRS-L-100	I	Hardscape and Materials Palette	15/10/2018			
	17352-NBRS-L-101	O	Hardscape and Materials Plan – Sheet One	12/04/2019			
	17352-NBRS-L-102	I	Hardscape and Materials Plan – Sheet Two	15/10/2018			
	17352-NBRS-L-103	O	Hardscape and Materials Plan – Sheet Three	12/04/2019			
	17352-NBRS-L-104	L	Hardscape and Materials Plan – Sheet Four	15/02/2019			
	17352-NBRS-L-105	I	Hardscape and Materials Plan – Sheet Five	15/10/2018			
	17352-NBRS-L-106	L	Hardscape and Materials Plan – Sheet Six	11/04/2019			
	17352-NBRS-L-107	L	Hardscape and Materials Plan – Sheet Seven	15/02/2019			
	17352-NBRS-L-108	N	Hardscape and Materials Plan – Sheet Eight	11/04/2019			
	17352-NBRS-L-200	I	Planting Palette	15/10/2018			
	17352-NBRS-L-300	I	Landscape Sections/Elevations 01	15/10/2018			
	17352-NBRS-L-301	I	Landscape Sections/Elevations 02	15/10/2018			
	17352-NBRS-L-302	I	Landscape Sections/Elevations 03	15/10/2018			
	17352-NBRS-L-400	I	Landscape Details 01	15/10/2018			
	17352-NBRS-L-401	I	Landscape Details 02	15/10/2018			
	17352-NBRS-L-402	I	Landscape Details 03	15/10/2018			
	Civil Drawings prepared by <i>Birzulis</i>						
	Dwg No.	Rev	Name of Plan	Date			
	707-BRIZ-C-100	8	Overall Site Plan	15/04/2019			
	707-BRIZ-C-102	9	Part Site Plan	15/04/2019			
	707-BRIZ-C-104	7	Part Site Plan	25/02/2019			
	707-BRIZ-C-106	8	Part Site Plan	25/02/2019			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: <ul style="list-style-type: none"> <li>(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</li> <li>(b) the implementation of any actions or measures contained in any such document referred to in (a) above.</li> </ul>	DPE comments on Dilapidation report under B6 have been addressed and Council satisfied as per their email of 4 July  Similar process for B15 and CEMP to address DPE comments on plans		C
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	-	Noted	C
<b>Limits of Consent</b>				
A5	This consent lapses five years after the date of consent unless the works associated with the development have physically commenced.		Works commenced 1 June 2019	C
<b>Prescribed Conditions</b>				
A6	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	This is assessed by certifying authority as works progress	Compliance being assessed by PCA	C
<b>Planning Secretary as Moderator</b>				
A7	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.			NT
<b>Long Service Levy</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A8	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.	NSW Long Service Corporation receipt no 00371804 dated 5 March 2019  NSW Long Service Corporation determination of levy dated 25 February 2019	Payment made	C
<b>Legal Notices</b>				
A9	Any advice or notice to the consent authority must be served on the Planning Secretary.			NT
<b>Evidence of Consultation</b>				
A10	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document for information; and (b) provide details of the consultation undertaken including: (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.	Evidence of consultation with relevant parties in relation to the CEMP and sub plans was sighted in the documents published on the Project website Also refer response to CoC B9	Compliant	C
<b>Staging</b>				
A11	The project may be constructed and operated in stages. Where staged construction or operation is proposed, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted for the approval of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation) unless otherwise agreed to by the Planning Secretary.	Not applicable as project is not being staged		NT

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A12	<p>The Staging Report must:</p> <ul style="list-style-type: none"> <li>(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;</li> <li>(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);</li> <li>(c) specify how compliance with conditions will be achieved across and between each of the stages of the project; and</li> <li>(d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.</li> </ul>	Not applicable as project is not being staged		NT
A13	The project must be staged in accordance with the Staging Report, as submitted to the Planning Secretary.	Not applicable as project is not being staged		NT
A14	Where staging is proposed, the terms of this approval that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	Not applicable as project is not being staged		NT
<b>Staging, Combining and Updating Strategies, Plans or Programs</b>				
A15	<p>With the approval of the Planning Secretary, the Applicant may:</p> <ul style="list-style-type: none"> <li>(a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</li> <li>(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</li> <li>(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</li> </ul>	Not applicable as project is not being staged		NT
A16	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.			NT



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A17	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.			NT
<b>Structural Adequacy</b>				
A18	<p>All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>• <i>Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</i></li> </ul>	This requirement needs to be certified by the PCA for the Project. We note that a Structural works certificate no 17194S109R04 was issued by the PCA (Metro Building Consultancy) on 28 June 2019	Compliance being assessed by PCA	NT
<b>External Walls and Cladding</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A19	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	<p>This requirement needs to be certified by the PCA for the Project.</p> <p>We note that a 23/05/2019 letter from NBRS Architects, stating that “the external wall materials meet the requirements of Clause C1-9 for the non-combustibility of the external walls.”</p> <p>BCA compliance review “issue for 90% CC” prepared by NBRS Architecture dated 24 May 2019</p> <p>Structural design certificate issued by Birzulis Associates Pty Ltd on 31 May 2019</p> <p>CSR test report NR-18006</p> <p>Bradford Gold Wall Batts technical datasheet</p>	Compliance being assessed by PCA	NT
<b>Applicability of Guidelines</b>				
A20	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.		Noted	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A21	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.			NT
<b>Monitoring and Environmental Audits</b>				
A22	<p>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&amp;A Act. This includes conditions in respect of incident notification, reporting and response, noncompliance notification, Site audit report and independent auditing.</p> <p><b>Note:</b> For the purposes of this condition, as set out in the EP&amp;A Act, “monitoring” is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an “environmental audit” is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</p>		Noted	C
<b>Access to Information</b>				

A23	<p>At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <p>(a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <ul style="list-style-type: none"> <li>(i) the documents referred to in condition A2 of this consent;</li> <li>(ii) all current statutory approvals for the development;</li> <li>(iii) all approved strategies, plans and programs required under the conditions of this consent;</li> <li>(iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;</li> <li>(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</li> <li>(vi) a summary of the current stage and progress of the development;</li> <li>(vii) contact details to enquire about the development or to make a complaint;</li> <li>(viii) a complaints register, updated monthly;</li> <li>(ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;</li> <li>(x) any other matter required by the Planning Secretary; and</li> </ul> <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>	<p>Website  <a href="https://www.schoolinfrastructure.nsw.gov.au/projects/a/armidale-secondary-college.html">https://www.schoolinfrastructure.nsw.gov.au/projects/a/armidale-secondary-college.html</a></p> <p>(a)(i) Documents available on  <a href="https://www.planningportal.nsw.gov.au/major-projects/project/10171">https://www.planningportal.nsw.gov.au/major-projects/project/10171</a>  (link on project website)</p> <p>(a)(ii) SSD Approval available on  <a href="https://www.planningportal.nsw.gov.au/major-projects/project/10171">https://www.planningportal.nsw.gov.au/major-projects/project/10171</a>  (link on project website)</p> <p>(a)(vi) brief summary available</p> <p>(a)(vii) general schools infrastructure email address</p> <p>(a)(viii) complaints register last undated 29/05/2019 (no complaints)</p> <p>(a)(ix)- not applicable at this stage</p>	<p>No evidence of compliance with (a)(iii), (viii)</p> <p>The CEMP was approved by the certifying authority and submitted to DPE for information on 31 May 2019 but was not available on the project website at the time of the audit.</p> <p>The Complaints Register available on the website at the time of the audit did not include the details of a complaint received on 13 June</p>	Non-compliant
Compliance				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A24	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.	Contracts issued to its sub-contractors by RCC mention SSD conditions for example Metal Roofing ITT dated 15 June	Evidence of compliance sighted	C
<b>ADVISORY NOTES</b>				
AN1	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.			NT
<b>PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION</b>				
<b>Notification of Commencement</b>				
B1	The Department must be notified in writing of the dates of commencement of physical work and operation at least 48 hours before those dates.	Notification of commencement of works issued to DPE on 31 May 2019. Letter sighted	Evidence of compliance sighted	C
B2	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.	Not triggered		NT
<b>Demolition</b>				
B3	Prior to the commencement of construction, demolition work plans required by AS 2601-2001 <i>The demolition of structures</i> (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifying Authority.	Letter from Demex (subcontractor) dated 24 May 2019 confirming structures demolished in accordance with AS2601-2001	Evidence of compliance sighted	C
<b>Certified Drawings</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B4	<p>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:</p> <ul style="list-style-type: none"> <li>(a) the relevant clauses of the BCA; and</li> <li>(b) this development consent.</li> </ul>	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619.	Assessed as compliant by PCA	C
<b>External Walls and Cladding</b>				
B5	<p>Prior to the commencement of construction (excluding earthworks), the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use or used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the BCA. The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it.</p>	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619.	Assessed as compliant by PCA	C
<b>Protection of Public Infrastructure</b>				
B6	<p>Before the commencement of construction, the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;</li> <li>(b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</li> <li>(c) submit a copy of the dilapidation report to the Planning Secretary, Certifying Authority and Council.</li> </ul>	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619.	Assessed as compliant by PCA	C
<b>Unexpected Contamination Procedure</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B7	Prior to the commencement of construction, 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.	Construction Environmental Management Plan, Ch 15 Environmental Management Measure Element 8: Unexpected Finds; Ch 16 Unexpected Contamination Procedure. 24 June Aconex advice sent by RCC to GHD details of material to be disposed offsite but not able to provide evidence of forwarding to DPE prior to material being removed from site	Not compliant at time of audit. Details of contaminated material and disposal site have been retrospectively advised to DPE by SINSW in letter dated 16 July 2019	Not compliant
<b>Utilities and Services</b>				
B8	Prior to commencement of construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Letters of consultation with several utility service providers sighted Refer response to CoC B9	Evidence of compliance sighted	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B9	Prior to the commencement of construction of any utility works associated with the development, written advice must be obtained from the electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.	<p>13/05/2019 Letter from Marline Newcastle Pty to NBRS (proponent contractor) "We certify that the current documented conduit is suitable for the expected communications connection"</p> <p>21/05/2019 letter from Marline re energy "we believe the above satisfies the requirements of the SSDA conditions"- attaches letters from essential energy</p> <p>21/05/2019 letter from Marline re natural gas- not available in Armidale</p> <p>21/05/2019 letter from Marline – "water and sewer will be provided to the site from existing mains external to the site".</p>	Evidence of compliance sighted	C
Community Communication Strategy				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B10	<p>A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication between the Applicant, the relevant Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction.</p> <p>The Community Communication Strategy must:</p> <ul style="list-style-type: none"> <li>(a) identify people to be consulted during the design and construction phases;</li> <li>(b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development;</li> <li>(c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development;</li> <li>(d) set out procedures and mechanisms: <ul style="list-style-type: none"> <li>(i) through which the community can discuss or provide feedback to the Applicant;</li> <li>(ii) through which the Applicant will respond to enquiries or feedback from the community; and</li> <li>(iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation.</li> </ul> </li> </ul>	<p>Document titled 'Community Communication Strategy' dated May 2019.</p> <p>B10(a)- see section 5 'Stakeholders', which sets out the people to be consulted during the design and construction phase</p> <p>B10(b)- see:</p> <ul style="list-style-type: none"> <li>- section 6 engagement approach</li> <li>- section 7 engagement delivery timetable</li> <li>- section 8 protocols</li> </ul> <p>B10(c)- see section 4 project governance, which provides for the formation of project reference groups</p> <p>B10(d)- see section 4 project governance and section 8 protocols</p>	Compliant	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B11	The Community Communication Strategy must be submitted to the Planning Secretary for information no later than 48 hours before the commencement of any work.	Letter dated 29 May 2019 from School Infrastructure NSW to Planning Secretary submitting the Community Communication Strategy for the Armidale Secondary College	Community Consultation Strategy was submitted to the Planning Secretary for information more than 48 hours before the commencement of works on 1 June 2019	C
<b>Ecologically Sustainable Development</b>				
B12	Prior to the commencement of construction (excluding earthworks), the Applicant must register for a minimum 4-star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifying Authority, unless an alternate certification process is agreed to by the Planning Secretary.	Greenstart confirmation of project registration on 14 June 2019 sighted This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619.	Evidence of compliance sighted	C
<b>Outdoor Lighting</b>				
B13	The Applicant must ensure that the design of all outdoor lighting associated with the operation of the school complies 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 of the lighting design with these requirements must be submitted to the satisfaction of the Certifying Authority prior to commencement of construction (excluding earthworks).	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619.	Compliant as assessed by PCA.	C
<b>Access for People with Disabilities</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B14	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 (excluding earthworks), 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.	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619.	Assessed as compliant by PCA	C
<b>Environmental Management Plan Requirements</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B15	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> <li>(a) detailed baseline data;</li> <li>(b) details of: <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(ii) any relevant limits or performance measures and criteria; and</li> <li>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> </li> <li>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</li> <li>(d) a program to monitor and report on the: <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the development;</li> <li>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</li> </ul> </li> <li>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</li> <li>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>(g) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</li> <li>(ii) complaint;</li> <li>(iii) failure to comply with statutory requirements; and</li> </ul> </li> <li>(h) a protocol for periodic review of the plan.</li> </ul> <p><b>Note:</b> The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	<p>EMP and CEMP dated 30/05/2019</p> <p>Demolition and Construction Risk Assessment/Management Plan (CoC B16)</p> <p>Construction Traffic and Pedestrian Management Sub-Plan (CoC B22)</p> <p>Construction Noise and Vibration Management Sub-Plan (CoC B23)</p> <p>Construction Waste Management Sub-Plan (CoC B24)</p> <p>Construction Soil and Water Management Sub-Plan (CoC B25);</p> <p>All plans approved by the PCA as per Aconex</p>	Evidence of compliance sighted	C
Rail Corridor				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B16	Prior to the commencement of works within and adjacent to the rail corridor, a Demolition and Construction Risk Assessment/Management Plan and Safe Work Method Statement be submitted to John Holland Rail for review and to the Planning Secretary for information.	No works have occurred within or adjacent to rail corridor		NT
B17	If excavation in, above, below, or adjacent to rail corridors is to be undertaken, a Geotechnical Assessment is required to be undertaken and confirming no adverse impact would be had on the stability of the rail corridor during construction.	No works have occurred within or adjacent to rail corridor		NT
B18	Prior to the commencement of works within and adjacent to the rail corridor, a safety assessment of any potential intrusion works necessary for the proposal on the Danger Zone be undertaken and submitted to John Holland Rail for review and to the Planning Secretary for information.	No works have occurred within or adjacent to rail corridor		NT
B19	No works shall commence within the Danger Zone until the safety assessment has been submitted to John Holland Rail and the Planning Secretary. Any works be undertaken in the Danger Zone are to be done by a qualified Protection Officer.	No works have occurred within or adjacent to rail corridor		NT
<b>Construction Environmental Management Plan</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B20	<p>Prior to the commencement of construction, the Applicant must prepare a Construction Environmental Management Plan (CEMP) and it must include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>(a) Details of: <ul style="list-style-type: none"> <li>(i) hours of work;</li> <li>(i) 24-hour contact details of site manager;</li> <li>(ii) management of dust and odour to protect the amenity of the neighbourhood;</li> <li>(iii) stormwater control and discharge;</li> <li>(iv) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;</li> <li>(v) groundwater management plan including measures to prevent groundwater contamination;</li> <li>(vi) external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting;</li> <li>(vii) community consultation and complaints handling;</li> </ul> </li> <li>(b) Construction Traffic and Pedestrian Management Sub-Plan (see condition B21);</li> <li>(c) Construction Noise and Vibration Management Sub-Plan (see condition B23);</li> <li>(d) Construction Waste Management Sub-Plan (see condition B24);</li> <li>(e) Construction Soil and Water Management Sub-Plan (see condition B25);</li> <li>(f) an unexpected finds protocol for contamination and associated communications procedure;</li> <li>(g) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and</li> <li>(h) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site.</li> </ul>	<p>EMP and CEMP dated 30/05/2019</p> <p>(a)(i)- CEMP section 4.2 (a)(i)- CEMP Appendix E, section 4 (pp 5 and 6) (a)(ii)- CEMP section 7 (a)(iii)- CEMP Appendix I, CSWMP, (a)(iv)- CEMP section 11 (a)(v)- not separate groundwater management plan, but groundwater management measures included at CEMP section 11 (a)(vi)- CEMP Appendix D (a)(vii)- CEMP Appendix E (b)- CEMP Appendix F (c)-CEMP Appendix G (d)-CEMP Appendix H (e)- CEMP Appendix I (f)- CEMP sections 15 and 16, Appendix J (g)- CEMP Appendix K (h)- CEMP Appendix L, remedial action plan for redevelopment works, Armidale High School</p>	<p>The CEMP addresses (a)(i), (i), (ii), (iii), (iv), (vi), (vii); (b), (c), (d), (e), (f), (g), (h)</p>	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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.	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619. 31/05/2019 letter from proponent (School Infrastructure NSW) to the Planning Secretary submitting CEMP as "generally in accordance with the requirements of B20 and associated B22, B23, B24 and B25".	Assessed as compliant by PCA.  Construction commenced 1 June 2019.	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B22	<p>The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s);</li> <li>(b) be prepared in consultation with Council;</li> <li>(c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services;</li> <li>(d) detail heavy vehicle routes, access and parking arrangements;</li> <li>(e) include a Driver Code of Conduct to: <ul style="list-style-type: none"> <li>(i) minimise the impacts of construction on the local and regional road network;</li> <li>(ii) minimise conflicts with other road users;</li> <li>(iii) minimise road traffic noise; and</li> <li>(iv) ensure truck drivers use specified routes;</li> </ul> </li> <li>(f) include a program to monitor the effectiveness of these measures; and</li> <li>(g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.</li> </ul>	<p>Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP), TTM Consulting Pty Ltd, 03/06/2019 (Rev 6)</p> <p>31/05/2019 email Metro Building Consultancy to RCC (proponent contractor) stating “MBC confirm that all parts of the CEMP (except for those parts highlighted in the Aconex below) have been satisfactorily addressed and is approved” (excludes, relevantly, B22(b); B22(c); B22(e)(ii) and(iii); B22(f)).</p> <p>31/05/2019 email from TTM to RRC re updated CTPMSP (addressing the Metro Building email of the same date) and included in revision 6</p>	The CTPMSP (Rev 6) addresses requirements the requirements of this condition	C



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B23	<p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced noise expert;</li> <li>(b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);</li> <li>(c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</li> <li>(d) include strategies that have been developed with the community for managing high noise generating works;</li> <li>(e) describe the community consultation undertaken to develop the strategies in condition B24(b); and</li> <li>(f) include a complaints management system that would be implemented for the duration of the construction.</li> </ul>	<p>31/05/2019 email Metro Building Consultancy to RCC (proponent contractor) stating "MBC confirm that all parts of the CEMP (except for those parts highlighted in the Aconex below) have been satisfactorily addressed and is approved" (excludes, relevantly, B23(d)and(e)). Subsequent MBC correspondence indicates that all aspects of CEMP addressed</p>	<p>Evidence of compliance sighted</p>	C
B24	<p>The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>(a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations;</li> <li>(b) removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines.</li> </ul>	<p>Construction Waste Management Sub-Plan 30 May 2019 addresses the requirements of this condition</p>	<p>Evidence of compliance sighted</p>	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B25	<p>The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following:</p> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified expert, in consultation with Council;</li> <li>(b) describe all erosion and sediment controls to be implemented during construction;</li> <li>(c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site);</li> <li>(d) detail all off-Site flows from the Site; and</li> <li>(e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI).</li> </ul>	Construction Soil and Water Management Plan Rev 6 addresses the requirements of this condition	Evidence of compliance sighted	C
<b>Construction Parking</b>				
B26	Prior to the commencement of construction, the Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.	30/05/2019 letter from TTM Consulting Pty Ltd to proponent setting out parking facilities and that "It is our advice that condition B26 in the draft condition of consent (SSD 9095) has been satisfied". Parking on site satisfactory	Per 30/05/2019 letter, expectation for 10 heavy vehicles and 180 cars, with heavy vehicle parking area and 206 on-site car parking spaces.	C
<b>Road Design and Traffic Facilities</b>				
B27	All roads and traffic facilities must be designed to meet the requirements of Council or RMS (whichever is applicable). The necessary permits and approvals from the relevant road authority must be obtained prior to the commencement of road or pavement construction works.	Not triggered yet		NT
<b>Infrastructure Works</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B28	<p>Within six months of the commencement of construction, the Applicant must provide written evidence to the satisfaction of the Planning Secretary demonstrating that approval pursuant to Section 138 of the <i>Roads Act 1993</i> has been obtained from Armidale Regional Council for the detailed design and construction of the following infrastructure works:</p> <ul style="list-style-type: none"> <li>(a) replacement footpath along the entire length of the western side of Butler Street and partially along Mann Street with a minimum width of 1500mm;</li> <li>(b) align the pedestrian crossing kerb ramps on the northern and southern sides of Kentucky Street west of Butler Street;</li> <li>(c) enhance the pedestrian refuge in Kentucky Street for visibility;</li> <li>(d) crown the lower area of the tree on the north western corner of Butler and Kentucky Street to improve vehicle/pedestrian visibility;</li> <li>(e) removal of concrete blisters on Butler Street between Manns Street and Hargrave Street;</li> <li>(f) redesign of pedestrian facilities on Butler Street to best suit pedestrian access to the school;</li> <li>(g) redesign of pedestrian crossing at Butler/Mann Street intersection; and</li> <li>(h) assessment and installation of appropriate Street lighting for pedestrian crossing facilities in Butler Street and at the Butler/Mann Street intersection.</li> </ul>	Not triggered yet		NT
<b>Stormwater Management System</b>				
B29	<p>Prior to the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifying Authority. The system must:</p> <ul style="list-style-type: none"> <li>(a) be designed by a suitably qualified and experienced person(s);</li> <li>(b) be generally in accordance with the conceptual design in the EIS;</li> <li>(c) be in accordance with applicable Australian Standards;</li> <li>(d) ensure that the system capacity has been designed in accordance with <i>Australian Rainfall and Runoff</i> (Engineers Australia, 2016) and <i>Managing Urban Stormwater: Council Handbook</i> (EPA, 1997) guidelines;</li> <li>(e) divert existing clean surface water around operational areas of the site; and</li> <li>(f) prevent cross-contamination of clean and sediment or leachate laden water.</li> </ul>	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619	Assessed as compliant by PCA	C
<b>Operational Noise – Design of Mechanical Plant and Equipment</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B30	Prior to commencement of construction (excluding earthworks), the Applicant must incorporate the noise mitigation recommendations in the Environmental Noise Assessment prepared by Day Design Pty Ltd dated 16 October 2018, 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 recommended operational noise levels identified in the Environmental Noise Assessment Noise Assessment prepared by Day Design Pty Ltd dated 16 October 2018.	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619	Assessed as compliant by PCA	C
<b>Construction and Demolition Waste Management</b>				
B31	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.	30/05/2019 email from RCC (proponent's construction contractor) to <a href="mailto:roadopening@rms.nsw.gov.au">roadopening@rms.nsw.gov.au</a> demonstrating "where there may be an increase in truck movement due to trucks coming to site" and advising of phone call of same date with Transport Management Centre that no need to notify the TMC  Notification from RCC on 13 June to TMC provides evidence of notification. 3 notifications issued thus far	Evidence of compliance sighted	C
<b>Operational Waste Storage and Processing</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B32	Prior to the commencement of construction (excluding earthworks), the Applicant must obtain agreement from Council for the design of the operational waste storage area where waste removal is undertaken by Council.	Email chain from 13/05/2019-27/05/2019, including Kristene Croft (at det.nsw.edu.au) stating that "ARC do not collect rubbish from ASC Duval Campus" In effect this condition is not relevant, as the school has their own waste contractor	Evidence of compliance sighted	C
<b>Mechanical Ventilation</b>				
B33	All mechanical ventilation systems must be designed in accordance with Part F 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 (excluding earthworks).	<p>This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619</p> <p>Plans for Mechanical Services for Armidale Secondary College</p>	Assessed as compliant by PCA	C
<b>Rainwater Harvesting</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B34	Prior to the commencement of construction (excluding earthworks), the Applicant must ensure that a rainwater reuse/harvesting system for the development is designed for the site. A rainwater re-use plan must be prepared and certified by an experienced hydraulic engineer.	<p>Rainwater reuse plan for Armidale High School, prepared by Marline Newcastle Pty Ltd</p> <p>21/05/2019, letter from Marline to NBRIS (proponent contractor) stating that "a rainwater reuse system has been designed for the site in accordance with NCC 2016, AS3500.1:2015 requirements and in line with the Stormwater Management Report – Rev D prepared by Birzulis Associates"</p> <p>Water from onsite dam being used for dust suppression.</p>	A rainwater reuse system has been designed for the site. Designs for a rainwater reuse plan have been prepared by an experienced hydraulic engineer	C
<b>Roadworks and Access</b>				
B35	Prior to the commencement of construction (excluding earthworks), the Applicant must submit design plans to the satisfaction of the relevant roads authority which demonstrate that the proposed accesses to the development are designed to accommodate the turning path of an 8.8m medium rigid vehicle.	22/05/2019 Email from Armidale Regional Council noting the proposed design is considered suitable by ARC as roads authority.	Design plans submitted to the satisfaction of Armidale Regional Council as the relevant roads authority (with the proviso that there is suitable pedestrian ramping either side of the kerb access)	C
<b>Car Parking and Service Vehicle Layout</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B36	<p>Compliance with the following requirements must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction (excluding earthworks):</p> <ul style="list-style-type: none"> <li>(a) all vehicles must enter and leave the Site in a forward direction;</li> <li>(b) minimum of 185 on-site car parking spaces for use during operation of the development and designed in accordance with the latest version of AS2890.1;</li> <li>(c) the swept path of the longest vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the Site, must be in accordance with AUSTROADS; and</li> <li>(d) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed.</li> </ul>	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619	Assessed as compliant by PCA	C
<b>Bicycle Parking and End-of-Trip Facilities</b>				
B37	<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 (excluding earthworks):</p> <ul style="list-style-type: none"> <li>(a) the provision of a minimum 100 bicycle parking spaces;</li> <li>(b) the layout, design and security of bicycle facilities must comply with the minimum requirements of AS 2890.3:2015 <i>Parking facilities - Bicycle parking</i>, and be located in easy to access, well-lit areas that incorporate passive surveillance;</li> <li>(c) the provision of end-of-trip facilities for staff in accordance with the ESD Design &amp; As Built rating tool;</li> <li>(d) appropriate pedestrian and cyclist advisory signs are to be provided; and</li> <li>(e) all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority.</li> </ul>	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619 "	Assessed as compliant by PCA	C
<b>Public Domain Works</b>				
B38	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. The Applicant must submit documentation of approval for each stage from Council to the Certifying Authority.	Not triggered yet		NT
<b>Compliance Reporting</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B39	No later than 48 hours 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.	29 May 2019 SINISW letter to DPE providing compliance monitoring program sighted  This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619	Evidence of compliance sighted	C
B40	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).	PCCR compliance report 29 May 2019 sighted	Evidence of compliance sighted	C
B41	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.	Not triggered at time of audit		NT
B42	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.	Not triggered		NT
<b>PART C DURING CONSTRUCTION</b>				
<b>Approved Plans to be On-site</b>				
C1	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.	Sighted in C1 folder kept at site office	Evidence of compliance sighted	C
<b>Site Notice</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C2	<p>A site notice(s):</p> <ul style="list-style-type: none"> <li>(a) must be prominently displayed at the boundaries of the site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifying Authority and Structural Engineer.</li> <li>(b) is to satisfy all but not be limited to, the following requirements: <ul style="list-style-type: none"> <li>i. minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size;</li> <li>ii. the notice is to be durable and weatherproof and is to be displayed throughout the works period;</li> <li>iii. the approved hours of work, the name of the site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and</li> <li>iv. the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the site is not permitted.</li> </ul> </li> </ul>	Signs on perimeter including at Gate 3 and 4 (Plate 8)	Evidence of compliance sighted during site audit	C
<b>Operation of Plant and Equipment</b>				
C3	<p>All plant and equipment used on site, or to monitor the performance of the development must be:</p> <ul style="list-style-type: none"> <li>(a) maintained in a proper and efficient condition; and</li> <li>(b) operated in a proper and efficient manner</li> </ul>	Observed during site inspection	Evidence of compliance sighted during site audit	C
<b>Demolition</b>				
C4	Demolition work must comply with Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001).	Demolition works completed by time of audit		NT
<b>Construction Hours</b>				
C5	<p>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"> <li>(a) between 7am and 6pm, Mondays to Fridays inclusive; and</li> <li>(b) between 8am and 1pm, Saturdays.</li> </ul> <p>No work may be carried out on Sundays or public holidays.</p>	This is communicated to site personnel through the General Induction. Two complaints received in May and June regarding deliveries were not compliant with this requirement.	Communication to relevant sub-contractor in Aconex on 18 June sighted advising them of no deliveries outside hours	NC

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C6	Activities may be undertaken outside of the hours in condition C5 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.	Not triggered yet		NT
C7	Notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	Not triggered yet		NT
C8	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	Not triggered or likely to be due to softness of rock		NT
<b>Implementation of Management Plans</b>				
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	Appendix B provides evidence of the implementation of the CEMP and selected sub plans reviewed as part of this audit	Effective implementation of a sample of measures from the CEMP, Community Communications Strategy, CTAMP, CSWMP, CWMP & CNVMP was observed.  Certain elements of the requirements of section 6.2 of the CSWMP were not being fully implemented at the time of the audit. These have been identified as non-compliances against the relevant conditions of approval	C
<b>Construction Traffic</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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.	Observed during site inspection	Evidence of compliance sighted	C
<b>Road Occupancy Licence</b>				
C11	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	Not triggered		NT
<b>SafeWork Requirements</b>				
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.	Site well fenced with access gates closed except for site vehicle access. 24/7 Security on site during demolition phase.	Evidence of compliance sighted	C
<b>Hoarding Requirements</b>				
C13	The following hoarding requirements must be complied with: <ul style="list-style-type: none"> <li>(a) no third-party advertising is permitted to be displayed on the subject hoarding/fencing;</li> <li>(b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application; and</li> <li>(c) the Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.</li> </ul>	At site inspection, no third party advertising or graffiti observed on hoarding, no hoarding over Council footways or road reserve.	Evidence of compliance sighted during site inspection	C
<b>No Obstruction of Public Way</b>				
C14	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances unless agreed to by the relevant roads' authority.	No public way obstructions noted on day of site inspection. These requirements are also included in the Site Induction & Site Rules presentation dated February 2019	Evidence of compliance sighted during site inspection	C
<b>Construction Noise Limits</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C15	The development must be constructed to achieve the construction noise management levels detailed in <i>the Interim Construction Noise Guideline</i> (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.	Non tonal reversing alarms were heard on mobile plant being used on site. No shouting or loud radios were heard on site. Mobile plant was turned off when not in use. Toolbox Talk given on 29 May 2019 includes advice regarding minimisation of noise impacts during construction work	Evidence of compliance at time of site inspection sighted	C
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 C5.	Complaints register recorded an incident of early morning delivery (prior to 7am) on 13 June 2019 that generated a complaint. Non-conformance issued to relevant sub-contractor in Aconex on 18 June sighted advising them of no deliveries outside hours.  Site Induction & Site Rules February 2019 includes reference to approved hours of work	Non-compliance with this requirement was addressed by issue of non-conformance to delivery contractor via Project management system procedure	NC

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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.	Non tonal reversing alarms were heard on mobile plant and equipment during the site inspection. Rev D of the CNVMP requires that consideration be given to the selection of acoustically treated mobile plant during consideration of tenders.	Evidence of compliance at time of site inspection sighted	C
C18	Any noise generated during construction of the development must not be offensive noise within the meaning of the <i>Protection of the Environment Operations Act 1997</i> or exceed approved noise limits for the site.	Noted Refer response to CoCs C15, C17 and C46. No offensive noise within the meaning of the <i>Protection of the Environment Operations Act 1997</i> heard on site at time of site inspection.	Compliant	C
C19	The Applicant must schedule intra-day 'respite periods' for construction activities identified in the <i>Interim Construction Noise Guideline</i> (Department of Environment and Climate Change, 2009) as being particularly annoying or intrusive to noise sensitive receivers. These activities are to be carried out after 8 am only and over continuous periods no exceeding three hours (with at least a one hour respite every three hours).	Not applicable currently		NT
<b>Vibration Criteria</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C20	Vibration caused by construction, at any residence or structure outside the site, must be limited to: (a) for structural damage, the latest version of <i>DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures</i> (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the <i>Environmental Noise Management Assessing Vibration: a technical guideline</i> (DEC, 2006) (as may be updated or replaced from time to time).	Separation distances are large and vibration impacts at nearest residences highly unlikely	Compliant	C
C21	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 C20.	Smooth drum and pad foot rollers used but these are more than 30m from residences	Compliant	C
C22	The limits in conditions C20 and C21 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B20 of this consent.	Noted  CNVMP, section 4.5 vibration criteria from the EPA	CNVMP does not outline limits on vibration other than those at C20 and C21 Compliant	C
<b>Tree Protection</b>				
C23	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 that are not approved for removal must be suitably protected during construction as per recommendations of the Tree Assessment Report prepared by McArdle and Sons Pro Tree Services dated 16 October 2018; and (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.	Some tree trimming requested by Council, but this will be done in consultation with arborist. Otherwise no impacts. Evidence of tree protection on site noted (Plate 16)	Evidence of compliance sighted	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Dust Minimisation</b>				
C24	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	1 water cart available on site. Haul roads were well compacted clay and damp at time of inspection. Use of polymer to be assessed if and when needed but not required currently	Evidence of compliance sighted	C
C25	During construction, the Applicant must ensure that: <ul style="list-style-type: none"> <li>(f) exposed surfaces and stockpiles are suppressed by regular watering;</li> <li>(g) all trucks entering or leaving the site with loads have their loads covered;</li> <li>(h) trucks associated with the development do not track dirt onto the public road network;</li> <li>(i) public roads used by these trucks are kept clean; and</li> <li>(j) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</li> </ul>	Mud tracking offsite through Gates 1 & 2 noted on day of inspection. A street sweeper was deployed to clean up mud and Gate 1 shut so vehicles can't use to exit (Plates 1 & 2)	Non-compliant with C25(h) & (i).  Agreed response: Rumble grid to be installed at Gate 2 to reduce mud tracking onto Butler Street.	NC
<b>Air Quality Discharges</b>				
C26	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	Asbestos particle monitoring done during demolition and earthworks.	No air quality monitoring required for main construction stage (other than visual observation)	C
<b>Erosion and Sediment Control</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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.	Good controls in place. Maintenance issues noted base of large soil stockpile (Plate 3) were being addressed on day of site audit. Any changes to the ERSED plan go back to Birzulis for approval.  <i>It was observed that additional controls are implemented on site (e.g. stockpile silt fences) but these are not recorded anywhere.</i>	Compliant.  As opportunity for improvement contractor agreed routine maintenance to be implemented by RCC resource. Logged back to Site Manager every second day for verification.	C
<b>Imported Soil</b>				
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 Department and Certifying Authority upon request.	Not triggered		NT
<b>Disposal of Seepage and Stormwater</b>				
C29	Adequate provisions must be made to collect and discharge stormwater drainage during construction of the building to the satisfaction of the principal certifying authority. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619	Assessed as compliant by PCA	C
<b>Unexpected Finds Protocol- Aboriginal Heritage</b>				



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.	Not triggered		NT
<b>Unexpected Finds Protocol- Historic Heritage</b>				
C31	If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and the OEH Heritage Division contacted. Depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area. Works may only recommence with the written approval of Heritage Division of the OEH.	ditto		NT
<b>Waste Storage and Processing</b>				
C32	Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	Construction wastes sorted. Litter was noted in places throughout site (Plates 4 & 5). Toolbox Talk on 24/7	Non-compliant.  Agreed response: Additional bins and site focus on litter completed via Toolbox Talk.	NC
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).	SERS do this. Evidence sighted	Evidence of compliance sighted	C
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.	No vehicles transporting waste were observed on day of site inspection however rumble grid was observed (Plate 13).	Evidence of compliance sighted (Plate 13) and mud tracking observed during site inspection was addressed and closed out on day of audit	C
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.	Washdown areas set up for contractors. Recycled concrete stockpiles are protected with silt fence and separated from waterways	Evidence of compliance sighted	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Handling of Asbestos</b>				
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.	Notices issued by SafeWork NSW 22 June	Evidence of compliance sighted	C
<b>Community Engagement</b>				
C37	The Applicant must consult with the community regularly throughout construction, including consultation with the nearby sensitive receivers identified on Figure 1 in the Environmental Noise Assessment prepared by Day Design Pty Ltd dated 16 October 2018, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders.	SINSW does this. Letterbox drop dated Feb 2019 re planned demo works notification sighted.	Evidence of compliance sighted	C
<b>Independent Environmental Audit</b>				
C38	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an Independent Audit Program or commencement of an Independent Audit.	Letter of approval of audit team by DPE dated 7 June 2019 included at Appendix C	Evidence of compliance sighted	C
C39	Within four weeks of 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.	Audit Program submitted to DPE & PCA by SINSW on 25 June 2019 This requirement was certified by the PCA for the Project on 28 June 2019 in report reference 17194-ASC-SSD-Main Works-280619	Evidence of compliance sighted	C
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 eight weeks of the notified commencement date of construction; and (b) A subsequent Independent Audit of construction must be undertaken no later than six months from the date of the initial construction Independent Audit. In all other respects Table 1 remains the same. The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those	Audit Program includes this requirement and this first audit is to satisfy the 8-week initial audit	This audit satisfies this requirement	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	specified above, upon giving at least 4 weeks' notice to the applicant of the date upon which the audit must be commenced.			
C41	Independent Audits of the development must be carried out in accordance with: <ul style="list-style-type: none"> <li>(a) the Independent Audit Program submitted to the Department and the Certifying Authority under condition C38 of this consent; and</li> <li>(b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).</li> </ul>	This audit report	This audit satisfies this requirement	C
C42	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant/Proponent must: <ul style="list-style-type: none"> <li>(a) review and respond to each Independent Audit Report prepared under condition C38 of this consent;</li> <li>(b) submit the response to the Department and the Certifying Authority; and</li> <li>(c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Department and notify the Department and the Certifying Authority in writing at least seven days before this is done.</li> </ul>	This audit report	This audit satisfies this requirement	C
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 be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.			NT
<b>Incident Notification, Reporting and Response</b>				
C44	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident.	Not triggered		NT
C45	Subsequent notification must be given, and reports submitted in accordance with the requirements set out in <b>Appendix 1</b> .			NT
<b>Non-Compliance Notification</b>				
C46	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Department in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after they identify any non-compliance.	This audit has identified non-compliances with the following CoAs:  A23 B7 C5	Note: Once this report is finalised, the Proponent should ensure that it notifies the Department of these non-compliances and provides the details required as per C47	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		C16 C25 C32  We are not aware of the PCA having notified the Department of any non-compliances in accordance with this condition		
C47	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.		To be satisfied as per the note above.	NT
C48	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Not triggered		NT
<b>Revision of Strategies, Plans and Programs</b>				
C49	Within three months of: <ul style="list-style-type: none"> <li>(a) the submission of a compliance report under condition B39;</li> <li>(b) the submission of an incident report under condition C44;</li> <li>(c) the issue of a direction of the Planning Secretary under condition A2 which requires a review,</li> </ul> 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.	Not triggered		NT
C50	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 Planning Secretary and Certifying Authority. Where revisions are required, the revised document must be submitted to the Planning Secretary and Certifying Authority for information within six weeks of the review.  <i><b>Note:</b> This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>	Not triggered		NT

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Landscaping</b>				
C51	<p>Within 3 months of the commencement of construction, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping works on-site, to the satisfaction of the Certifying Authority. The plan must:</p> <ul style="list-style-type: none"> <li>(a) detail the species to be planted on-site;</li> <li>(b) describe the monitoring and maintenance measures to manage revegetation and landscaping works;</li> <li>(c) be consistent with the Applicant's Management and Mitigation Measures in the Tree Impact Assessment Appendix 13 of the EIS;</li> <li>(d) provide for the planting of 242 trees indigenous to the local area including 40 trees of intermediate mature size up to 12m and 50 larger native trees with a minimum mature size of 15m and a potential mature size of 25m;</li> <li>(e) native trees to be planted on site must consist of advanced and established local native tree species with a minimum tree height of 2-2.5m and/or plant container pot size of 100 litres; and</li> <li>(f) provide for the planting of street trees along the western side of Butler Street between Manns Road and Kentucky Street. Species and spacing of trees are to be determined in consultation with Council.</li> </ul>	Not triggered <del>in progress</del>	Compliant	NT €
<b>PART D PRIOR TO OCCUPATION OR COMMENCEMENT OF USE</b>				
<b>Notification of Occupation</b>				
D1	The date of commencement of the occupation of the development must be notified to the Department in writing, at least one month before occupation. If the operation of the development is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.			Not triggered
<b>External Walls and Cladding</b>				
D2	Development lighting and external finishes of buildings should not temporarily blind or cause distraction to train drivers in the railway corridor.			Not triggered
D3	Use of red and green lights is to be avoided in all signs, lighting or building colour schemes which face the rail corridor.			Not triggered
D4	Prior to the occupation of the building, the Applicant must provide the Certifying Authority with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D5	The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it			Not triggered
<b>Post-construction Dilapidation Report</b>				
D6	<p>Prior to occupation of the building, the Applicant must engage a suitably qualified person to prepare a post-construction dilapidation report at the completion of construction. This report is:</p> <ul style="list-style-type: none"> <li>(a) to ascertain whether the construction created any structural damage to adjoining buildings or infrastructure.</li> <li>(b) to be submitted to the Certifying Authority. In ascertaining whether adverse structural damage has occurred to adjoining buildings or infrastructure, the Certifying Authority must: <ul style="list-style-type: none"> <li>a. compare the post-construction dilapidation report with the pre-construction dilapidation report required by these conditions; and</li> <li>b. have written confirmation from the relevant authority that there is no adverse structural damage to their infrastructure and roads.</li> </ul> </li> <li>(c) to be forwarded to Council.</li> </ul>			Not triggered
<b>Protection of Public Infrastructure</b>				
D7	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> <li>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and</li> <li>(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development.</li> </ul>			Not triggered
<b>Utilities and Services</b>				
D8	Prior to occupation of the building, a compliance certificate under the section 307 of the <i>Water Management Act 2000</i> must be obtained from Council and submitted to the Certifying Authority.			Not triggered
<b>Roadworks and Access</b>				
D9	The Applicant must complete the infrastructure upgrade works agreed to under Condition B28 prior to operation and to the satisfaction of Council.			Not triggered
<b>Works as Executed Plans</b>				
D10	Prior to occupation of the building, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifying Authority.			Not triggered
<b>Green Travel Plan</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D11	<p>Prior to the commencement of operation, a Green Travel Plan (GTP), must be prepared and be submitted to the Secretary to promote the use of active and sustainable transport modes. The plan must:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified traffic consultant in consultation with Armidale Regional Council and Transport for NSW;</li> <li>b) include objectives and modes share targets (i.e. Site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP;</li> <li>c) include specific tools and actions to help achieve the objectives and mode share targets;</li> <li>d) include measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the GTP; and</li> <li>e) include details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of students and staff to and from the school at appropriate times throughout the academic year.</li> </ul>			Not triggered
<b>Operational Transport and Access Management Plan (OTAMP)</b>				
D12	<p>An OTAMP is to be prepared for the school by a suitably qualified person, in consultation with Council, Transport for NSW and RMS, to the satisfaction of the Secretary, and must address the following:</p> <ul style="list-style-type: none"> <li>(a) Detailed pedestrian analysis including the identification of safe route options – to identify the need for management measures such as staggered school start and finish times to ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish;</li> <li>(b) the location of all car parking spaces on the school campuses and their allocation (i.e. staff, visitor, accessible, emergency, etc.);</li> <li>(c) the location and operational management procedures of the pick-up and drop off parking, including staff management/traffic controller arrangements;</li> <li>(d) the location and operational management procedures for the pick-up and drop-off of students by buses and coaches for excursions and sporting activities, including staff management/traffic controller arrangements;</li> <li>(e) delivery and services vehicle and bus access and management arrangements;</li> <li>(f) management of approved access arrangements;</li> </ul>			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>(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;</p> <p>(h) car parking arrangements and management associated with the proposed use of school facilities by community members; and</p> <p>(i) a monitoring and review program.</p> <p>The OTAMP(s) must be submitted to the Secretary for approval prior to operation of the development.</p> <p>The OTAMP(s) (as revised from time to time) must be implemented by the Applicant for the life of the development.</p>			
<b>School Zones</b>				
D13	<p>Installation of all required School Zone signage, speed management signage and associated pavement markings along Kentucky Street, Butler Street, Lambs Avenue/Mann Street, Mossman Street and Hargrave Street is to be completed prior to commencement of occupation of the development.</p> <p><i>Note: Any required approvals for altering public road speed limits, design and signage are required to be obtained from the relevant consent authority.</i></p>			Not triggered
D14	<p>Following installation of School Zone signage, speed management signage and associated pavement markings along Kentucky Street, Butler Street, Lambs Avenue/Mann Street, Mossman Street and Hargrave Street, as required by condition D13, the Applicant must arrange an inspection with RMS for formal handover of assets. The handover of assets must occur prior to commencement of use of the development.</p>			Not triggered
D15	<p>The Applicant must maintain records of all dates in relation to installing, altering and removing traffic control devices related to speed.</p>			Not triggered
<b>Mechanical Ventilation</b>				
D16	<p>Following completion, installation and testing of all mechanical ventilation systems, the Applicant must provide evidence to the satisfaction of the Certifying Authority, prior to the final occupation, that the installation and performance of the mechanical systems complies with:</p> <ul style="list-style-type: none"> <li>(a) the BCA;</li> <li>(b) AS 1668.2-2012 <i>The use of air-conditioning in buildings – Mechanical ventilation in buildings</i> and other relevant codes;</li> <li>(c) the development consent and any relevant modifications; and</li> <li>(d) any dispensation granted by the Fire and Rescue NSW.</li> </ul>			Not triggered
<b>Car Parking Arrangements</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D17	Unless otherwise agreed by the Planning Secretary, occupation or commencement of use of the school must not occur until evidence to the satisfaction of the Planning Secretary is submitted demonstrating construction works associated with the proposed school, have been completed and that the expanded car parking facility is operational.			Not triggered
<b>Road Damage</b>				
D18	The cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Subject Site as a result of construction works associated with the approved development is to be met in full by the Applicant prior to commencement of use of any stage of the development.			Not triggered
<b>Fire Safety Certification</b>				
D19	Prior to the final occupation, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety Certificate must be submitted to the relevant authority and Council. The Fire Safety Certificate must be prominently displayed in the building.			Not triggered
<b>Structural Inspection Certificate</b>				
D20	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"> <li>(a) the site has been periodically inspected and the Certifying Authority is satisfied that the structural works is deemed to comply with the final design drawings; and</li> <li>(b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.</li> </ul>			Not triggered
<b>Compliance with Food Code</b>				
D21	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 <i>Design, construction and fit-out of food premises</i> . The Applicant must provide evidence of receipt of the certificate to the satisfaction of the Certifying Authority prior to occupation.			Not triggered
<b>Stormwater Quality Management Plan</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D22	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: (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.			Not triggered
D23	Details demonstrating compliance must be submitted to the Certifying Authority prior to occupation.			Not triggered
<b>Rainwater Harvesting</b>				
D24	A signed works-as-executed Rainwater Re-use Plan must be provided to the Certifying Authority prior to occupation of the building.			Not triggered
<b>Warm Water Systems and Cooling Systems</b>				
D25	The installation, operation and maintenance of warm water systems and water cooling systems (as defined under the <i>Public Health Act 2010</i> ) must comply with the <i>Public Health Act 2010</i> , Public Health Regulation 2012 and Parts 1 and 2 (or Part 3 if a Performance-based water cooling system) of <i>AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance</i> and the NSW Health Code of Practice for the Control of Legionnaires' Disease.			Not triggered
<b>Outdoor Lighting</b>				
D26	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 - <i>Control of the obtrusive effects of outdoor lighting</i> (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.			Not triggered
<b>Signage</b>				
D27	Way-finding signage and signage identifying the location of staff car parking must be installed prior to occupation.			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D28	Bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas prior to occupation.			Not triggered
D29	'Do not drink' signage on non-potable water used for toilet flushing and to new hose taps and irrigation systems for landscaped areas must be installed within the site prior to occupation.			Not triggered
<b>Operational Waste Management Plan</b>				
D30	<p>Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Department/Certifying Authority. The Waste Management Plan must:</p> <ul style="list-style-type: none"> <li>(a) detail the type and quantity of waste to be generated during operation of the development;</li> <li>(b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the <i>Protection of the Environment Operations Act 1997</i>, <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and the <i>Waste Classification Guideline</i> (Department of Environment, Climate Change and Water, 2009);</li> <li>(c) detail the materials to be reused or recycled, either on or off site; and</li> <li>(d) include the Management and Mitigation Measures included in Appendix 25 if the EIS.</li> </ul>			Not triggered
<b>Validation Report</b>				
D31	Prior to the commencement of operation, the Applicant must submit to the EPA, Planning Secretary and Certifying Authority for information a Validation report for the remediation works undertaken under the Review of Environmental Factors issued on 21 December 2018.			Not triggered
<b>Speed Limit Authorisation</b>				
D32	<p>The Applicant must submit the following details to RMS, at least eight weeks prior to occupation of the site, and obtain authorisation to install School Zone signs and associated pavement markings, and / or removal / relocation of any existing Speed Limit signs:</p> <ul style="list-style-type: none"> <li>(a) a copy of the Conditions of Consent;</li> <li>(b) the proposed school commencement/opening date;</li> <li>(c) two sets of detailed design plans showing the following: <ul style="list-style-type: none"> <li>(i) accurate Site boundaries;</li> <li>(ii) details of all road reserves, adjacent to the Site boundaries;</li> <li>(iii) all proposed access points from the Site to the public road network and any additional conditions imposed/proposed on their use;</li> </ul> </li> </ul>			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>(iv) all existing and proposed pedestrian crossing facilities on the adjacent road network;</li> <li>(v) all existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings); and</li> <li>(vi) all existing and proposed street furniture and street trees.</li> </ul>			
<b>Ecologically Sustainable Development</b>				
D33	Unless otherwise agreed by the Planning Secretary, within six months of commencement of operation, Green Star certification must be obtained demonstrating the development achieves a minimum 4-star Green Star as Built rating. If required to be obtained, evidence of the certification must be provided to the Certifying Authority and the Planning Secretary.			Not triggered
<b>Landscaping</b>				
D34	The Applicant must not commence operation until the Landscape Management Plan is submitted to the Planning Secretary and Certifying Authority for information.			Not triggered
<b>PART E POST OCCUPATION</b>				
<b>Out of Hours Event Management Plan</b>				
E1	<p>The Applicant is to prepare an Out of Hours Event Management Plan (School Use) 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> <ul style="list-style-type: none"> <li>(a) the number of attendees, time and duration;</li> <li>(b) arrival and departure times and modes of transport;</li> <li>(c) where relevant, a schedule of all annual events;</li> <li>(d) demonstrate measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport);</li> <li>(e) details of the use of the school hall, agricultural facilities, sports fields and courts, where applicable, restricting use before 8 am and after 10 pm;</li> <li>(f) measures to minimise localised traffic and parking impacts; and</li> <li>(g) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.</li> </ul>			Not triggered
E2	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.			Not triggered
E3	The Out of Hours Event Management Plan must be implemented by the Applicant for the duration of the identified events or use.			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
E4	The Applicant is to prepare an Out of Hours Event Management Plan (Community Use) 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, and include the following: <ul style="list-style-type: none"> <li>(a) the number of attendees, time and duration;</li> <li>(b) arrival and departure times and modes of transport;</li> <li>(c) where relevant, a schedule of all annual events;</li> <li>(d) demonstrate measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport);</li> <li>(e) details of the use of the school hall, agricultural facilities, sports fields and courts, where applicable, restricting use before 8 am and after 10 pm;</li> <li>(f) measures to minimise localised traffic and parking impacts; and</li> <li>(g) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.</li> </ul>			Not triggered
E5	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 community event or use.			Not triggered
E6	The Out of Hours Event Management Plan must be implemented by the Applicant for the duration of the identified community event or use.			Not triggered
	<b>Operation of Plant and Equipment</b>			
E7	All plant and equipment used on site, or to monitor the performance of the development must be: <ul style="list-style-type: none"> <li>(a) maintained in a proper and efficient condition; and</li> <li>(b) operated in a proper and efficient manner.</li> </ul>			Not triggered
	<b>Community Communication Strategy</b>			
E8	The Community Communication Strategy, must be implemented for a minimum of 12 months following the completion of construction.			Not triggered
<b>Operational Noise Limits</b>				
E9	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in the <i>Environmental Noise Assessment for the Redevelopment of Armidale Secondary College, Butler Street, Armidale</i> prepared by Day Design Pty Ltd, and dated 16 October 2018.			Not triggered
E10	The Applicant must undertake short term noise monitoring in accordance with the <i>Noise Policy for Industry</i> 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			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	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 <i>Environmental Noise Assessment for the Redevelopment of Armidale Secondary College, Butler Street, Armidale</i> prepared by Day Design Pty Ltd, and dated 16 October 2018.			
E11	Should the noise monitoring program identify any exceedance of the recommended noise levels referred to above, the Applicant is required to implement appropriate noise attenuation measures so that operational noise levels do not exceed the recommended noise levels or provide attenuation measures at the affected noise sensitive receivers.			Not triggered
<b>Unobstructed Driveways and Parking Areas</b>				
E12	All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.			Not triggered
<b>Green Travel Plan</b>				
E13	The GTP required by condition D11 of this consent must be updated annually and implemented.			Not triggered
<b>Ecologically Sustainable Development</b>				
E14	Unless otherwise agreed by the Planning Secretary, within six months of commencement of operation, Green Star certification must be obtained demonstrating the development achieves a minimum 4-star Green Star As Built rating. If required to be obtained, evidence of the certification must be provided to the Certifying Authority and the Planning Secretary.			Not triggered
<b>Signage</b>				
E15	The illumination of the sign and LED screens must be switched off between 6pm and 7am, unless otherwise agreed by Council.			Not triggered
E16	The lighting to be used in connection with the sign must comply with AS4282 - Control of the Obtrusive Effects of Outdoor Lighting, to protect the amenity of the locality.			Not triggered
E17	The sign must not: <ul style="list-style-type: none"> <li>(a) dazzle or distract drivers due to their colouring;</li> <li>(b) be able to be mistaken for a traffic signal because they have, for example, red, amber or green circles, octagons, crosses or triangles;</li> <li>(c) be able to be mistaken as an instruction to drivers;</li> </ul>			Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	(d) display advertising or messages which contain fully animated or video/movie style advertising or images; or (e) be used for any live television, satellite, internet or similar broadcast			
E18	The sign must not emit sound.			Not triggered
<b>Outdoor Lighting</b>				
E19	Notwithstanding Condition D26, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.			Not triggered
<b>Fire Safety Certificate</b>				
E20	The owner must submit to Council an Annual Fire Safety Statement, each 12 months after the final Safety Certificate is issued. The certificate must be on, or to the effect of, Council's Fire Safety Statement.			Not triggered
<b>Landscaping</b>				
E21	The Applicant must maintain the landscaping and vegetation on the site in accordance with the Landscape Management Plan required by condition C51 for the duration of occupation of the development.			Not triggered

## Appendix B. CEMP and Sub-plans

Unique ID	Requirement of plan	Evidence collected	Independent Audit findings and recommendations	Implementation Status
<b>Community Communication Strategy (CoC B11 and B12)</b>				
Table 3: 1300 community information line	The free call 1300 482 651 number is published on all communication materials and is manned by SINSW. All enquiries that are received are referred to the appointed C&E Manager and/or Senior Project Manager. Directed as required and logged in the CRM. Once resolved, a summary of the conversation is updated in the CRM.	Called 1300 number at 1630 on 18 July 2019 and left message asking to be called back on my mobile. Call back received at 1643 in response to my message.	Compliant	C
Table 3: CRM database	All projects are created in SINSW 's Customer Relationship Management system -Darzin- at project inception.  Interactions, decisions and feedback from stakeholders are captured, and monthly reports generated.  Any enquiries and complaints are to be raised in the CRM and immediately notified to the Senior Project Director, Project Director and Community Engagement Manager.	Extract from Complaints Register sighted including 2 complaints from May and June 2019 which were forwarded to the RCC Site Manager for actioning	Evidence of compliance sighted	C
Table 3: FAQs	Set of internally approved answers provided in response to frequently asked questions. Used as part of relevant stakeholder and community communication tools. These are updated as required and included on the website if appropriate.	FAQs available on Project website	Evidence of compliance sighted	C
Table 3: Newsletters	Available in hard copy and electronic format. A monthly or quarterly newsletter providing updated information on project scope, benefits, construction progress, achievement of project milestones and other project related issues of interest. Similar to an	3 Community Updates (August and November 2018 and February 2019) available on Project website	Evidence of compliance sighted	C



	info pack in content but used as a regular high-level update for the community.			
<b>Construction Environmental Management Plan (CoC B20)</b>				
3.3 Daily Toolbox Meetings	<p>The Principal Contractor will also conduct daily toolbox meetings with all personnel to review management procedures and identify / discuss daily site conditions and potential hazards. Site inductions and toolbox talks will highlight specific environmental requirements and activities being undertaken at the worksite each day.</p> <p>A record of issues covered in daily toolbox meetings should be maintained for future audit.</p>	<p>Toolbox Talk Record dated 29 May 2019 sighted which includes site noise and dust issues. Toolbox Talk Record of 24 July sighted includes housekeeping issues.</p> <p>Site Induction Record No 460 sighted</p> <p><i>NB: The General Site Induction did not contain a lot of project specific environmental information. It is understood however that such information is generally provided to personnel via Toolbox Talks with a site wide Toolbox Talk provided every Wednesday</i></p>	Evidence of compliance sighted	C
7.2 7 Environmental Management Measure Element 1: Air Quality Procedures	<ul style="list-style-type: none"> <li>• Use of surfactant spray (onsite in close proximity of the earth works and at the site boundary/fences) is required for odour suppressant during works (this is up to the discretion of the Project Manager and the environmental consultant).</li> <li>• Heavy equipment and vehicles will be appropriately maintained to minimise exhaust emissions.</li> <li>• Appropriate methods of dust suppression will be implemented, such as ensuring earthworks materials remain moist to ensure dust is minimised during works.</li> <li>• Evaluate weather conditions prior to works commencing and during any change in wind direction.</li> <li>• Cease works if dust or odour generation is excessive.</li> <li>• Covering of any stockpiles that are to remain for greater than two days (Waste reclassification or ENM stockpiles, ACM demolition stockpiles), or if weather</li> </ul>	<p>Polymer not required at time of inspection due to recent wet weather and sticky nature of clay surface that was exposed. Water truck being used to dampen haul road.</p> <p>No visible dust emissions or odours noted during site inspection.</p> <p>No uncovered loads observed leaving site during site inspection.</p> <p>Complaints Register sighted.</p>	Evidence of compliance sighted	C

	<p>forecasts predict strong winds; with plastic or Hessian material.</p> <ul style="list-style-type: none"> <li>• All dust/odour control measures will be kept in good operating condition and be functional at all times, with regular maintenance.</li> <li>• All loads are to be covered and appropriately fitted with tarpaulins to contain dust and/or odour during transport.</li> <li>• A complaints register will be established and maintained to receive and address complaints from the community regarding the detection of nuisance odour during the works.</li> <li>• Residents in the vicinity of the proposed works will be informed of potential dust/odour impacts prior to the commencement of works</li> </ul>			
15.1 Table 12: Summary of unexpected Finds Management	<ul style="list-style-type: none"> <li>• Visual assessment of uncovered unexpected finds by the Environmental Specialist. The Environmental Specialist shall direct the Excavator Operator if the soil has to re-assessed onsite or disposed of-based on the waste classification.</li> <li>• In the event that an unexpected find is of cultural or historical nature, a nominated archaeologist would be available to attend the site.</li> <li>• Cease site works until the Project Manager has been notified of any unexpected finds and appropriate instructions have been provided to field personnel to address the issue.</li> <li>• Project Manager to inform the Contract Administrator of any unexpected finds.</li> </ul>	No unexpected finds have occurred to date.	Compliant	C
<b>Construction Traffic and Pedestrian Management Plan (CoC B22)</b>				
2.5 Pedestrian Management	Pedestrian movements around the site will be maintained during the construction works at all times. Boundary fence will be used to limit pedestrian	Pedestrian footpath access was available around the site during the site inspection.	Evidence of compliance sighted	C

	<p>access to the site. Where works require the closure of an existing pedestrian route, a suitable alternative is to be provided.</p> <p>Site staff will assist in the management of pedestrian movements while heavy vehicles are entering or exiting the site.</p>			
2.6 Materials Handling and Cranes	<p>Loading and unloading is to occur on-site. There will be various plant and equipment used on site as identified in Table 2-2. A tower crane will also be required on site and the working arm extents will be contained wholly within the site boundary.</p>	<p>Loading was observed to be occurring within the site during the site inspection</p>	<p>Evidence of compliance sighted</p>	C
2.9 Construction vehicle impacts	<p>Construction vehicle activities of the development are over three stages. Average heavy vehicle demand information relating to the works has been provided by RCC. The absolute peak number of trucks expected during a day is 9 vehicles (equivalent to 18 vehicle trips) – with most days averaging much less.</p>	<p>The numbers were not specifically checked but apart from a small number of light vehicles, no heavy vehicles were observed leaving the site</p>	<p>Evidence of compliance sighted</p>	C
2.10 Site Fencing	<p>The construction site will be enclosed by fencing/hoarding to prevent access to the property and to protect the public / roadway from construction activities.</p>	<p>Sighted (Plate 9)</p>	<p>Evidence of compliance sighted</p>	C
<b>Construction Noise and Vibration Management Plan (CoC B23)</b>				
3.2 Development Description	<p>The proposed and allowable hours of construction works, including delivery of materials to and from the site, are as follows:</p> <ul style="list-style-type: none"> <li>Monday to Friday: 7 am to 6pm</li> <li>Saturdays: 8 am to 1 pm</li> <li>Sundays and public holidays: No work</li> </ul>	<p>This is advised to personnel during the Site Induction.</p> <p><i>NB: The 2 complaints received on 21 May and 13 June related to delivery vehicles arriving at site prior to 7am</i></p>	<p>An NCR given to contractor and discussed in site wide toolbox.</p>	C
6.1 Engineering and Practical Noise Controls	<p>Where applicable, we recommend locating mechanical plant near the centre of the construction area such that it is as far as practically possible from the residences to the east and west.</p>	<p>Noted</p>	<p>Compliant</p>	C
6.2 Noise Management Controls	<p>We recommend that noisy construction activities such as rock hammering only operate for 2 to 3 hours at a time.</p>	<p>Not triggered as no rock hammering or other particularly noisy work has taken place since the beginning of construction work on the project</p>	<p>Compliant</p>	C

	Ensure activities in any one location are staggered, for instance, if rock hammering is occurring near to a residential receptor, all other construction activities will cease in the same location to as to minimise cumulative noise impacts.			
6.2 Noise Management Controls  Work Practices	<p>We recommend that workers and contractors be trained in work practices to minimise noise emission such as the following:</p> <ul style="list-style-type: none"> <li>• Avoid dropping materials from a height.</li> <li>• Avoid shouting and talking loudly outdoors.</li> <li>• Avoid the use of radios outdoors that can be heard at the boundary of residences.</li> <li>• Turn off equipment when not being used.</li> <li>• Carry out work only within the proposed hours of operation (see Section 3.2).</li> </ul>	Noise minimisation was addressed in a Toolbox Talk given on 29 May 2019	Compliant	C
<b>Construction Waste Management Plan (CoC B24)</b>				
4.1 Waste Avoidance	<p>The Building Contractor must identify opportunities for waste avoidance including the following:</p> <ul style="list-style-type: none"> <li>• Appropriate sorting and segregation of construction wastes to ensure efficient recycling of wastes;</li> <li>• Selecting construction materials taking into consideration their lifespan and potential for reuse;</li> <li>• Ordering materials to size and ordering pre-cut and prefabricated materials;</li> <li>• Planned work staging;</li> <li>• Reducing packaging waste on-site by returning packaging to suppliers where possible, purchasing in bulk, requesting cardboard or metal drums rather than plastics;</li> <li>• Careful on-site storage and source separation; and</li> <li>• Subcontractors informed of Site waste management procedures.</li> </ul>	Recycling of building and demolition waste and mulch was observed on site during the site inspection (Plates 10 & 11)	Evidence of compliance sighted	C

4.4.4 Hazardous Materials Disposal	<p>Hazardous and/or contaminated material that is not suitable to remain onsite shall be transported for offsite disposal to a suitably licensed facility. Hazardous materials waste should be assessed and classified for disposal in accordance with the NSW EPA (2014) <i>Waste Classification Guidelines: Part 1 – Classifying Waste</i>.</p> <p>At the time of the preparation of this WMP, the Armidale Waste Management Facility is licensed to accept asbestos waste under EPL 5860 (refer Table 4.5).</p>	Details of contaminated material disposed of to landfill are set out in CoC B7.	Evidence of compliance sighted	C
4.5 Re-use, Recycling and Disposal of General Materials	<p>Effective management of construction materials and construction waste, including options for reuse and recycling where applicable and practicable, must be conducted. Only project wastes that cannot be practicably and cost effectively reused or recycled are to be sent to landfill or appropriate disposal facilities. The following specific procedures are to be implemented:</p> <ul style="list-style-type: none"> <li>Waste materials such as timber, metal, brick, concrete to be recycled by an appropriately licensed recycling facility for processing and reuse;</li> <li>All solid waste timber, brick, concrete, rock that cannot be reused or recycled to be taken to an appropriate landfill site and disposed of in an approved manner; and</li> <li>All garbage to be disposed of via a council-approved system.</li> </ul>	As per 4.1 above	Evidence of compliance sighted	C
<b>Construction Soil and Water Management Plan (CoC B25)</b>				
5.2 Proposed Stormwater Treatment System	<p>Developed impervious areas including roof, hardstand, car parking, roads and other extensive impervious areas are required to be treated by the Stormwater Treatment Measures (STM's). The STM's shall be sized according to the whole catchment area of the development. As a design input, we have allowed for a gross pollutant trap "Jellyfish" to be installed at the first inlet point in the</p>	Not yet triggered, this is still under design and have yet to be constructed	NA	NT

	<p>tank prior to stormwater runoff entering the rainwater tank. STM's for the development shall be based on a treatment train approach to ensure that ARC's objectives are met.</p> <p>Components of the treatment train for the development are as follows:</p> <ul style="list-style-type: none"> <li>• Treatment of stormwater on the development is to be performed via the provision of a treatment train of proprietary systems; <ul style="list-style-type: none"> <li>○ Primary treatment to the roof areas via jellyfish devices; and</li> <li>○ Secondary treatment of all site water to be treated using end-of-line gross pollutant traps (Ocean Protect - Vortechs).</li> </ul> </li> </ul>			
6.2 Mitigation	<p>Managing Urban Stormwater – Soils and Construction (Landcom, 2004) and the Blacktown Engineering Guide to Development to mitigate potential impacts to the downstream water quality from construction activities.</p> <p>Controls would include:</p> <ul style="list-style-type: none"> <li>• Sediment management devices, such as fencing, hay bales or sandbags;</li> <li>• Measures to divert or capture and filter water prior to discharge, such as drainage channels and first flush and sediment basins;</li> <li>• Installation of measures at work entry and exit points to minimise movement of material onto adjoining roads, such as rumble grids or wheel wash bays;</li> <li>• Appropriate location and storage of construction materials, fuels and chemicals, including bunding where appropriate;</li> <li>• All refuelling of vehicles and equipment on site would be undertaken a minimum of 50 metres away from water bodies and surface drains, where possible and;</li> </ul>	<p>Erosion and sediment controls were well established around and within the site (Plates 12 &amp; 13). Maintenance of the silt fence, particularly at the base of one of the soil stockpiles was underway at the time of the site inspection (Plate 3)</p> <p>Evidence of poor housekeeping, including storage of waste oil, fuels and chemicals outside designated storage areas was noted (Plates 6 &amp; 7)</p> <p>Evidence of litter being disposed of on site was also noted (Plates 4 &amp; 5)</p> <p>Evidence of mud tracking onto Butler Street from Gates 1 &amp; 2 was noted (Plates 1 &amp; 2)</p>	<p>Recommendations:</p> <ol style="list-style-type: none"> <li>1. Increased deployment of street sweeper on Butler Street</li> <li>2. Entry gates be shut so vehicles can't use gates without rumble grids for exiting</li> <li>3. Rumble grid be installed at Gate 2</li> <li>4. Inspection of erosion &amp; sediment controls be made a routine task with maintenance as required.</li> <li>5. Toolbox Talk on housekeeping &amp; litter issues</li> </ol>	NC

	<ul style="list-style-type: none"> <li>Any fuel, oil or other liquids stored onsite would be stored in an appropriately sized impervious bunded area.</li> <li>Measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site. This could be the installation of an on-site vehicle wash bay prior to vehicles leaving the site.</li> </ul>		and proper storage of liquids and chemicals be undertaken	
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	-----------------------------------------------------------	--

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



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

Contact: Emmanuel Smith-Aspros  
Phone: 02 8275 1232  
Email: [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

**BY EMAIL ONLY:** [robert.crestani@det.nsw.edu.au](mailto:robert.crestani@det.nsw.edu.au)

Dear Mr Robert Crestani

**Agreement of Independent Auditor  
Armidale High School (SSD 9095)**

Reference is made to the submission, dated 30 May 2019, seeking the agreement of the Secretary of the Department of Planning and Environment (the Department) of a suitability qualified, experienced and independent audit team to undertake independent audits of the Armidale High School project.

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

- Mr Steve Fermio; and
- Mr 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.

The Department reserves the right to request an alternate team for future audits.

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

If you have any questions, please contact Emmanuel Smith-Aspros on the details listed above.

Yours sincerely



Shelley McPhee 05/06/2019  
**Team Leader - Compliance**  
As nominee of the Secretary

## **Appendix D. Consultation records**

## Derek Low

---

**From:** Derek Low  
**Sent:** Tuesday, 2 July 2019 9:58 PM  
**To:** HERITAGEMailbox@environment.nsw.gov.au  
**Subject:** Independent Audit of Armidale High School Redevelopment (SSD 9095)

Hi there.

I am one of the DPE approved Independent Auditors on the Armidale High School Redevelopment (SSD 9095).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 9095 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

<https://majorprojects.accelo.com/public/bf37058456fbcf23492bae787347186e/SSD%209095%20Consent.pdf>

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

The audit is scheduled to occur on 9 July 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the OEH on the scope of the audit. I understand the OEH provided advice during the assessment phase of the Project. The issues raised by OEH were considered by the Department and the Project was approved subject to conditions.

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

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

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

Derek Low

Principal Environmental Consultant



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

P: 0402 403 716

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

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



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## Derek Low

---

**From:** OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>  
**Sent:** Tuesday, 2 July 2019 9:58 PM  
**To:** Derek Low  
**Subject:** Automated Response  
**Attachments:** image001.png

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

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

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

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

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

Alternatively, the postal address for Aboriginal Cultural Heritage is:

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

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

Sincerely



Office of  
Environment  
& Heritage

Customer Strategies  
Heritage Division

Locked Bag 5020, Parramatta 2124  
T 02 9873 8500

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

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

## Derek Low

---

**From:** Anna London <Anna.London@environment.nsw.gov.au>  
**Sent:** Thursday, 4 July 2019 12:03 PM  
**To:** Derek Low  
**Subject:** Heritage input - Independent Audit of Armidale High School Redevelopment (SSD 9095)

Hi Derek,

Thank you for your email regarding the post-approval audit of the Armidale High School redevelopment project. We have no particular comment as the heritage conditions in this consent are standard unexpected finds conditions.

However, in general terms, when considering unexpected finds protocols for historical archaeology it is important that the procedure makes reference to s146 of the *Heritage Act 1977* (notification of discovery of relics). Further, if your audit finds that relics have been discovered then it is important that the proponent has notified the Heritage Council of NSW.

Please note that the Greater Sydney Planning Team within the Climate Change & Sustainability Division of the Department of Planning, Infrastructure and Environment may provide separate comment in relation to Aboriginal cultural heritage.

Please do not hesitate to contact me should you require any clarification.

Regards,

Anna

**Anna London**  
Senior Customer Strategies Officer  
Heritage, Community Engagement  
Department of Premier and Cabinet  
T: 02 9873 8608

---

**From:** Derek Low <dlow@wolfpeak.com.au>  
**Sent:** Tuesday, 2 July 2019 9:58 PM  
**To:** OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>  
**Subject:** Independent Audit of Armidale High School Redevelopment (SSD 9095)

Hi there.

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In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the OEH on the scope of the audit. I understand the OEH provided advice during the assessment phase of the Project. The issues raised by OEH were considered by the Department and the Project was approved subject to conditions.

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

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

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

Derek Low

Principal Environmental Consultant



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

P: 0402 403 716

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

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Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

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## Derek Low

---

**From:** Derek Low  
**Sent:** Tuesday, 2 July 2019 9:54 PM  
**To:** council@armidale.nsw.gov.au  
**Subject:** Independent Audit of Armidale High School Redevelopment (SSD 9095)

Hi there.

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The audit is scheduled to occur on 9 July 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the Armidale Council on the scope of the audit. I understand the Council provided advice during the assessment phase of the Project. The issues raised by Council were considered by the Department and the Project was approved subject to conditions.

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

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

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

Derek Low

Principal Environmental Consultant



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## Derek Low

---

**From:** Council <council@armidale.nsw.gov.au>  
**Sent:** Tuesday, 2 July 2019 9:54 PM  
**To:** Derek Low  
**Subject:** Thank you for contacting the Armidale Regional Council

Thank you for contacting Armidale Regional Council.

Your email has been received and a response will be provided shortly.

This message has been created automatically. You are not required to respond to this message.

**P** 1300 136 833 **F** 02 6772 9275

**E** [council@armidale.nsw.gov.au](mailto:council@armidale.nsw.gov.au) **W** [armidaleregional.nsw.gov.au](http://armidaleregional.nsw.gov.au)

PO Box 75A Armidale NSW 2350



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## Derek Low

---

**From:** Derek Low  
**Sent:** Tuesday, 2 July 2019 9:56 PM  
**To:** [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)  
**Cc:** Kate Moore (DPE)  
**Subject:** Independent Audit of Armidale High School Redevelopment (SSD 9095)

Hi there.

I am one of the DPE approved Independent Auditors on the Armidale High School Redevelopment (SSD 9095).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 9095 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

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

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

Derek Low

Principal Environmental Consultant



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## Derek Low

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**From:** DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>  
**Sent:** Tuesday, 2 July 2019 9:57 PM  
**To:** Derek Low  
**Subject:** Automatic Response

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

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

Kind regards,

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

## Derek Low

---

**From:** Emmanuel Smith-Aspros <Emmanuel.Smith-Aspros@planning.nsw.gov.au>  
**Sent:** Monday, 8 July 2019 4:26 PM  
**To:** Derek Low  
**Cc:** Shelley McPhee; Kate Moore (DPE)  
**Subject:** RE: HPE CM: Fwd: Independent Audit of Armidale High School Redevelopment (SSD 9095)

Hi Derek,

Thank you for consulting with the Department in relation to the independent audit scope for the Armidale High School Redevelopment (SSD 9095).

As discussed, at this stage the Department has not identified any key issues for consideration beyond the audit scope requirements outlined within the Independent Audit Post Approval Requirements (Department 2018).

Please let me know if you have any questions.

Regards

Emmanuel Smith-Aspros  
Senior Compliance Officer (Social Infrastructure)

Planning & Assessments | Department of Planning, Industry and Environment  
T 02 8275 1232 | M 0499 399 756 | E emmanuel.smith-aspros@planning.nsw.gov.au  
GPO Box 39 | 320 Pitt St, Sydney NSW 2001  
[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)

Begin forwarded message:

**From:** Derek Low <[dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au)>  
**Date:** 2 July 2019 at 9:55:54 pm AEST  
**To:** "[compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)" <[compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)>  
**Cc:** "Kate Moore (DPE)" <[Kate.Moore@planning.nsw.gov.au](mailto:Kate.Moore@planning.nsw.gov.au)>  
**Subject:** Independent Audit of Armidale High School Redevelopment (SSD 9095)

Hi there.

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

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

**Derek Low**  
Principal Environmental Consultant



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P: 0402 403 716

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## Derek Low

---

**From:** Derek Low  
**Sent:** Tuesday, 2 July 2019 10:00 PM  
**To:** 'info@epa.nsw.gov.au'  
**Subject:** Independent Audit of Armidale High School Redevelopment (SSD 9095)

Hi there.

I am one of the DPE approved Independent Auditors on the Armidale High School Redevelopment (SSD 9095).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 9095 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

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The audit is scheduled to occur on 9 July 2019 and pertains to post-approval requirements and compliance.

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

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

Derek Low

Principal Environmental Consultant



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

P: 0402 403 716

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

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



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## Derek Low

---

**From:** Environment Line <info@environment.nsw.gov.au>  
**Sent:** Tuesday, 2 July 2019 10:01 PM  
**To:** Derek Low  
**Subject:** Thank you for your email. Your Reference Id is 00860386 (ref:\_00D7F6iTix.\_5007Fmyo2r:ref)



---

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

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

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

When sending further emails about this topic (Independent Audit of Armidale High School Redevelopment (SSD 9095)), please ensure the following extended Reference Id appears anywhere in the email subject or body:

ref:\_00D7F6iTix.\_5007Fmyo2r:ref

---

## Derek Low

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**From:** James Allen <James.Allen@epa.nsw.gov.au> on behalf of EPA HIEH Environmental Audit Unit Mailbox <environmental.audit@epa.nsw.gov.au>  
**Sent:** Thursday, 11 July 2019 1:10 PM  
**To:** Derek Low  
**Cc:** Rebecca Scrivener; Victoria Lee; EPA HIEH Environmental Audit Unit Mailbox; INFOEnvironment  
**Subject:** 002: Independent Audit of Armidale High School Redevelopment (SSD 9095)

Dear Mr Low,

Thank you for your email which was forwarded to the Environmental Audit mailbox on 3 July 2019. In response to your request from the EPA to confirm any key issues it would like examined, relating to post-approval requirements and compliance. I have consulted with our CLM Branch and EPA's North Region and provide the following advice;

- EPA North Branch has previously provided comments on this EIS during November 2018 (refer to DOC18/922247). EPA's recommendations was that '*Consideration may also be given to engaging an EPA accredited site auditor.*' Further information regarding our site auditor program is available at: <https://www.epa.nsw.gov.au/your-environment/contaminated-land/site-auditor-scheme>.
- The development consent conditions relevant to contaminated land matters are Conditions B7 and B20 which pertain to preparation of an unexpected finds protocol (Condition #B7) and its incorporation into the CEMP (Condition B20).

Normally, the content of this unexpected finds protocol is reviewed by an **EPA accredited site auditor** rather than by a DPE approved independent auditor. Please Note that Independent auditors are different from site auditors accredited by the NSW EPA under the *Contaminated Land Management Act*.

- Site auditors accredited under the CLM Act are on web page <https://www.epa.nsw.gov.au/your-environment/contaminated-land/site-auditor-scheme/accredited-site-auditors>
- This site doesn't come up as a CLM regulated or notified site database.
- The site does not hold an Environment Protection Licence (EPL). The EPA's regulatory role is only as ARA for public authority.
- Confirmation of appropriate waste classification, treatment, disposal pathways and documentation that ALL waste is being taken to a lawful facility. Particularly the asbestos waste taken to Qld is being tracked appropriately.

I hope you find this information helpful.

Kind regards

**James Allen**  
A/Head Environmental Audit Unit | Contaminated Sites Section  
**NSW Environment Protection Authority**  
☎: (02) 9995 5510 | 📠: (02) 9995 5930  
✉: [james.allen@epa.nsw.gov.au](mailto:james.allen@epa.nsw.gov.au)

**From:** Environment Line <info@environment.nsw.gov.au>  
**Sent:** Wednesday, 3 July 2019 12:53 PM  
**To:** EPA HIEH Environmental Audit Unit Mailbox <environmental.audit@epa.nsw.gov.au>

**Subject:** FW: Independent Audit of Armidale High School Redevelopment (SSD 9095) [ ref:\_00D7F6iTix.\_5007Fmyo2r:ref ]

Hi all

FYI

Regards  
Environment Line

----- Forwarded Message -----

**From:** Derek Low [dlow@wolfpeak.com.au]

**Sent:** 02/07/2019 22:00

**To:** [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)

**Subject:** Independent Audit of Armidale High School Redevelopment (SSD 9095)

Hi there.

I am one of the DPE approved Independent Auditors on the Armidale High School Redevelopment (SSD 9095).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 9095 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

<https://majorprojects.accelo.com/public/bf37058456fbcf23492bae787347186e/SSD%209095%20Consent.pdf>

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

The audit is scheduled to occur on 9 July 2019 and pertains to post-approval requirements and compliance.

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

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

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

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

**Derek Low**

Principal Environmental Consultant



*Proudly sponsoring the LGNSW*



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

P: 0402 403 716

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

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## Derek Low

---

**From:** Derek Low  
**Sent:** Tuesday, 2 July 2019 10:03 PM  
**To:** stakeholder.relations@transport.nsw.gov.au  
**Subject:** Independent Audit of Armidale High School Redevelopment (SSD 9095)

Hi there.

I am one of the DPE approved Independent Auditors on the Armidale High School Redevelopment (SSD 9095).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 9095 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

<https://majorprojects.accelo.com/public/bf37058456fbcf23492bae787347186e/SSD%209095%20Consent.pdf>

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

The audit is scheduled to occur on 9 July 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the Transport for NSW (TfNSW) on the scope of the audit. I understand TfNSW provided advice during the assessment phase of the Project. The issues raised by TfNSW were considered by the Department and the Project was approved subject to conditions.

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

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

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

**Derek Low**  
Principal Environmental Consultant



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

# Independent Audit Declaration Form

## Independent Audit Declaration Form


Project name	Armidale Secondary College
Consent Number	9095
Description of Project	Amalgamation of Duval High School and Armidale High School into a single enlarged school campus to be known as Armidale Secondary College
Project Address	158 – 182 Butler Street, Armidale NSW 2350
Proponent	NSW Department of Education
Title of Audit	Independent Audit
Date	24/06/2019

I declare that I:

- 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 declare to the Department prior to the audit, that I have been engaged to prepare the Audit Program for the project.**
- I am not the Environmental Representative for the project; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

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

# Independent Audit Declaration Form

## Independent Audit Declaration Form

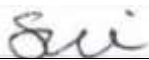
Project name	Armidale Secondary College
Consent Number	9095
Description of Project	Amalgamation of Duval High School and Armidale High School into a single enlarged school campus to be known as Armidale Secondary College
Project Address	158 – 182 Butler Street, Armidale NSW 2350
Proponent	NSW Department of Education
Title of Audit	Independent Audit
Date	24/06/2019

I declare that I:

- 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 declare to the Department prior to the audit, that I have been engaged to prepare the Audit Program for the project.**
- I am not the Environmental Representative for the project; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

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

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



Plate 1 – Mud tracking over footpath onto Butler Street





Plate 2 – Mud tracking from Gate 2 onto Butler Street





Plate 3 – Silt fence damaged by soil boulders





Plate 4 – Litter observed dumped on site





Plate 5 – Litter observed left on site





Plate 6 – Sump oil left in receptacle in non-bunded area





Plate 7 – Unknown chemical drums left in unbunded area



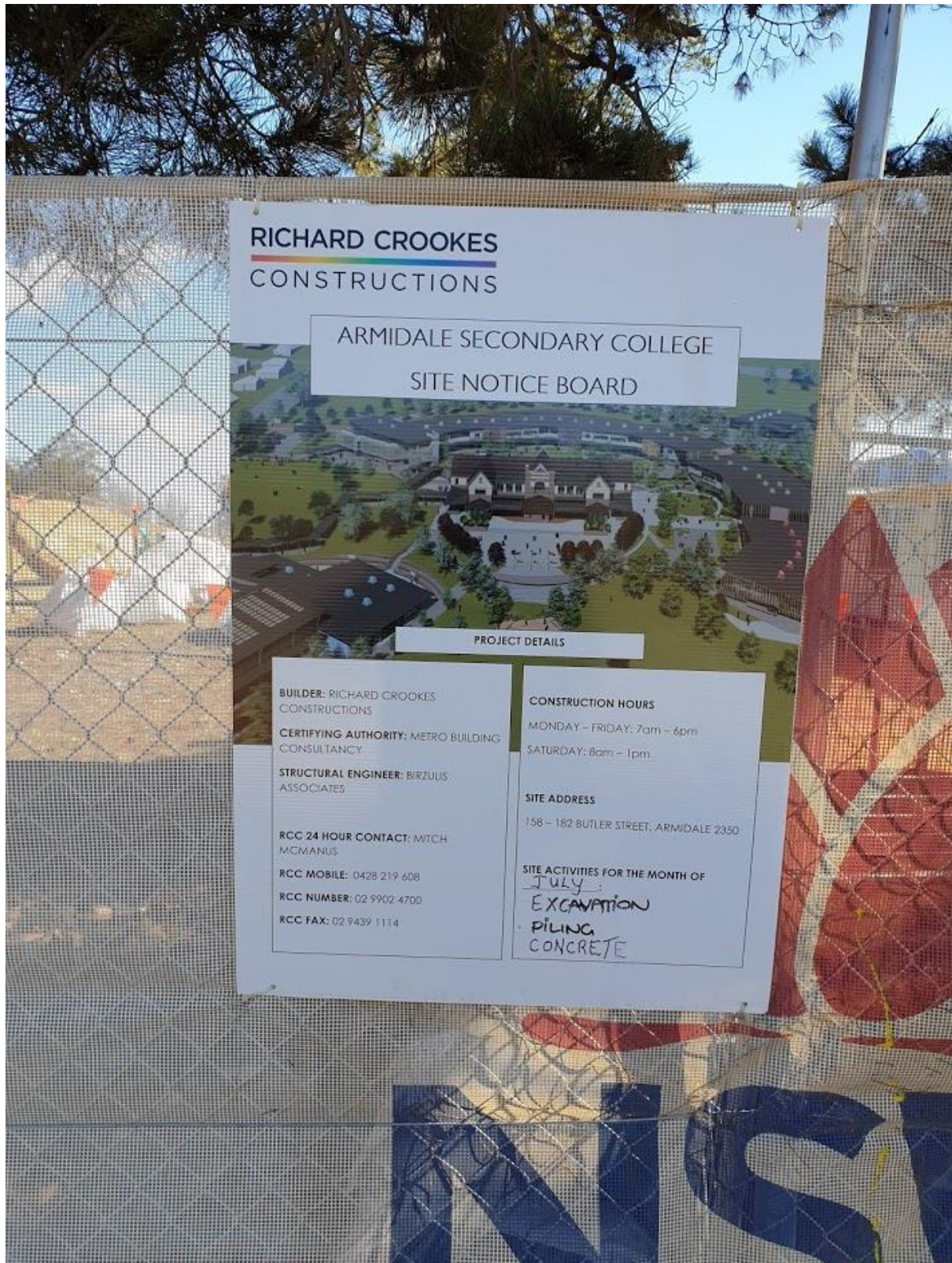


Plate 8 – Site notice





Plate 9 – Site hoarding near Gate 2



Plate 10 – Recycled demolition material stockpile





Plate 11 – Recycled mulch stockpile





Plate 12 – Silt socks in Butler Street stormwater drain





Plate 13 – Rumble grid and stabilized exit point at Gate 4



Plate 14 – Bunded store





Plate 15 – Tree protection on site



**WolfPeak Pty Limited**

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