

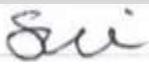


CURL CURL NORTH PUBLIC SCHOOL – SSD 8310

**INDEPENDENT AUDIT REPORT**

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Revision	Date	Prepared By	Reviewed By	Description
V0	2/10/2019	S Fermio	D Low	First draft for Auditee comment
V1	4/10/2019	S Fermio	D Low	Final Report
V2	12/11/2019	D Low	-	Update to address DPIE comments

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<b>Date</b>	4/10/2019	<b>Date</b>	4/10/2019

## Executive Summary

The NSW Department of Education – Schools Infrastructure NSW (SINSW) is responsible for delivering the Curl Curl North Public School upgrade (the Project).

The Project involves an upgrade to the school facilities including the library and the administration facilities, the provision of 40 new teaching spaces and an upgrade to the external playing area.

Consent to the Project was granted on 28 November 2018 under section 4.38 of the *Environmental Planning and Assessment Act 1979* (SSD 8310) subject to a number of conditions of consent (CoC). The notified date of commencement of construction was 17 April 2019.

The objective of this Independent Audit is to satisfy SSD 8310, CoC C42. 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 September 2019.

Coffey have been appointed as the client representative on behalf of SINSW. ADCO Constructions Pty Ltd (ADCO) is the principal contractor. The Project is being constructed in 3 stages. Site establishment and demolition works were completed in early 2019 as required to allow the commencement of Stage 1 works in April 2019. The works are being delivered in 3 stages as follows:

- Stage 1 (underway at time of this audit)
  - 40 new permanent teaching spaces
  - new library
  - upgrade to the administration facilities
- Stage 2
  - new hall
  - upgrade to external play space
- Stage 3
  - final landscaping
  - demolition of existing hall

The project is being staged so as to allow the school to continue to operate during the upgrade.

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 Coffey and ADCO personnel on 19 September 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 assessed. 5 non-compliances were identified against the CoCs.

There were 3 positive observations made as a result of the audit in relation to:

- o state-of-the-art site egress / ingress point
- o highly innovative site information board
- o MSDS labels attached to fuel and chemical containers

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, Coffey and ADCO.

The Auditor would like to thank the auditees for their cooperation and assistance during the Independent Audit.

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## 1. Introduction

### 1.1 The Project

Curl Curl North Public School (CCNPS) is located at Playfair Road, North Curl Curl, approximately 13.5km north of the Sydney Central Business District. The location is presented in Figure 1.



**Figure 1: CCNPS location (from EIS for the Project, Urbis 2017).**

The CCNPS redevelopment project (the Project) is to increase the capacity of CCNPS to accommodate population growth in the Northern Beaches Local Government Area. CCNPS currently accommodates a maximum of 920 students and 70 staff, and after redevelopment is proposed to accommodate up to 1,000 students from Kindergarten to Year 6, and a total of 76 staff (65 teachers and 11 administration persons).

The Project comprises the following alterations and additions:

- Stage 1 (underway at time of this audit)
  - 40 new permanent teaching spaces
  - new library
  - upgrade to the administration facilities
- Stage 2
  - new hall

- upgrade to external play space
- Stage 3
  - final landscaping
- demolition of existing hall.

The Project was granted consent under Section 4.38 of the *Environmental Planning and Assessment Act 1979* on 28 November 2018 (State Significant Development 8310) subject to a number of conditions.

## 1.2 Approval requirements

Conditions of Consent (CoC) C42-C45, SSD 8310 sets 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 CoC C42-C45 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 29 August 2019. The letter is presented in Appendix C.

## 1.4 The objectives of the audit

The objective of this IA is to satisfy SSD 8310, CoC C43. 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 C42 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 specifies that the first IA would be undertaken by 4

September, although we note that SINSW advised the Department on 29 August 2019 that due to resourcing issues, the Final Audit report would be submitted by 4 October 2019.

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

This IA seeks to fulfill the requirements of CoC C43, 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 on 28 November 2018 through to the date of the audit on 19 September 2019.

The scope of the IA comprises:

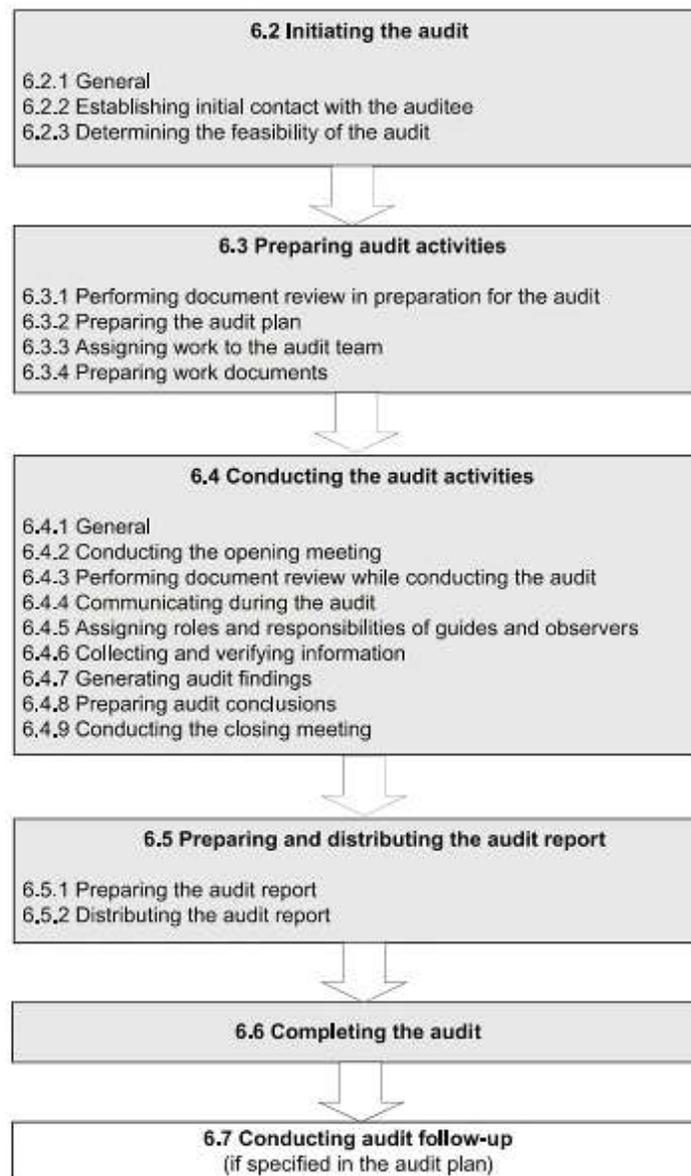
- an assessment of:
  - CoCs applicable to the phase of the development that is being audited
  - post approval documents prepared to satisfy the CoCs, including an assessment of the implementation of Environmental Management Plans and Sub-plans
  - all environmental licences and approvals applicable 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 9 September 2019 WolfPeak consulted with the Department, Transport for NSW, the Office of Environment and Heritage, Sydney Water, the Environment Protection Authority and Northern Beaches 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	DPIE requested that the audit focus on Conditions B1 and B6-B14 which relate to parking and contamination	<p>Compliance with B1 verified.</p> <p>Compliance with Conditions B6 – B14 largely verified with evidence of Remedial Action Plan (RAP) being implemented and oversight by EPA Accredited Site Auditor as outlined in Site Auditor’s Interim Advice Letter of 21/2/2019.</p> <p>RAP is being progressively implemented due to staging of project</p>
RMS	RMS reviewed the approved conditions of consent and notes the all our requirements are incorporated in the conditions of consent. Roads and Maritime has no further requirements for the redevelopment of this school.	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</p>	NA

Stakeholder	Issues and areas of focus	How addressed
	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.	
Environment Protection Authority	<p>The EPA advised that it is not aware of any particular issues regarding the school.</p> <p>It noted that one complaint was received on 24 June 2019 from the Northern Beaches Council regarding sediment laden water.</p>	ADCO Construction Manager asked the construction team and reviewed his site diary, along with all emails for 24/6/19 including a few days either side and has no records of a complaint about sediment laden water on this date
Sydney Water	No response	NA
Northern Beaches 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 checklist) and distributed to the Project team in preparation for the IA.

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

- 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).
- Development Consent SSD 8310
- SSD 8310 Approved Plans
- Environmental Impact Statement Curl Curl North Public School
- Remedial Action Plan for Curl Curl North Public School Redevelopment prepared by EIS (February 2019)
- Interim Audit Advice Letter No. 1 – Curl Curl North Public School Remedial Action Plan (Ramboll February 2019)

### 2.1.3 Site personnel involvement

The on-site audit activities took place on 19 September 2019. The following personnel took part in the audit:

- Steve Fermio – Auditor (WolfPeak)
- William Fehrs – Project Manager (Coffey)
- Brian Taylor – Site Manager (ADCO)
- Antony Petkovic – HSR Manager (ADCO)
- David Lock – Project Manager (ADCO)
- Grace Tame – Project Engineer (ADCO)
- Matthew Wilkinson – Construction Manager (ADCO).

## **Meetings**

Opening and closing meetings were held with the Auditor and Project personnel listed above on 19 September 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 19 September 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 Appendix A.

### **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 8310 applicable to the works being undertaken, including implementation of 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 Appendix A.

#### 3.2 Compliance Status

This Section presents the findings of the September 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 Checklist provided in Appendix A presents details of all the evidence collected, observed and provided in support of a finding.

##### 3.2.1 Summary

There were 117 CoCs assessed.

5 non-compliances were identified against the CoCs.

There were three positive observations identified.

##### 3.2.2 Details

###### Non-compliance against CoC A19

CoC A19 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 19 September 2019, the website did not make available the approved CEMP and sub plans and up to date Complaints Register as required by this condition.*

### **Non-compliance against CoC B27**

CoC B27 requires, amongst other things, that a Construction Soil and Water Management Plan (CSWMP) be prepared by a suitably qualified expert, in consultation with Council.

*There was no evidence provided to indicate that the CSWMP had been prepared in consultation with Council.*

### **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 19 July indicates that a concrete pour occurred after 6pm on this date.*

### **Non-compliance against CoC C38**

CoC C38 requires, amongst other things, that the Department must be notified in writing to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au) within seven days after the Applicant becomes aware of any non-compliance.

*Works that occurred outside approved hours on 3 July 2019 were not reported to the Department within 7 days.*

### **Non-compliance against CoC C42**

CoC C42 requires that no later than 3 months after the date notified for the commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.

*On 15 April 2019 SINSW provided notification of commencement of construction for 17 April 2019. The auditors were engaged in August 2019 and the Audit Program was submitted to the Department on 29 August 2019. This is beyond the 3 months deadline specified by the condition.*

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

There were no corrective action requests made.

Three positive observations were made in relation to:

- Sliding Gate and Hardstand at the main site egress / ingress point. The site access is probably one of the best I have observed in audits of numerous development and infrastructure sites. The entrance provided a high level of site security and the high-quality hardstand and cattle grid ensured that mud tracking offsite was minimized (Plates 1A & 1B). The design of these features is set out ADCO's pocket sized *Project Setup Guideline* which itself is a good initiative.
- The Daily Site Notice Plan (Plates 4 & 5) contains easily updateable details of what activities are taking place where on the site, live service locations, erosion and sediment controls, traffic management details etc. This is a highly interactive approach designed to engage site personnel more effectively than the traditional pre-start talk and paper copies of management plans and procedures that quickly become outdated or superceded.
- Fuel and chemical containers have a durable plastic label MSDS attached to the container itself (Plate 6), which allows for rapid identification of any environmental or safety impacts of the stored liquids in the event of a spill or safety incident

### **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 implementation of the following plans during the audit and site inspection:

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

The mitigation measures and controls set out in the documents are generally adequate and these are being implemented during construction activities.

At the time of the audit I was made aware of only one complaints raised by sensitive receivers during the construction of Stage 1 and am not aware of any environmental concerns raised by regulatory authorities having been passed onto the Project team. On the basis of this evidence it is considered that the plans reviewed above are adequate.

### **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 Appendix A) 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.

#### **3.6.2 Issues raised by Auditor**

The Project team established Dropbox folders for each CoA containing documentation to demonstrate compliance and this was a good initiative. However, it is suggested that oversight / coordination by a person on the Team as to the relevance of the documentation deposited in the folders (a compliance documentation 'gatekeeper' role) should be undertaken.

Many length, complexity and multi aspect nature of many conditions can make demonstrating compliance with all of their requirements challenging. More succinct conditions that focus on a single compliance aspect would assist in this regard.

### **3.7 Complaints**

A complaints register is required to be maintained by the Project and made publicly available on its website. At the time of the site audit on 19 September, no register was available. This is noted as a non-compliance against CoA A19.

### **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 predicted impacts for the key assessment issues 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 Impact	Summary of mitigation measures required	Actual impacts observed during audit period Consistent (Y/N)
Overshadowing	Overshadowing of adjoining residential properties.	The key mitigation measure was to ensure the chosen orientation, bulk and scale of the proposed School buildings minimise overshadowing impacts.	NA at construction stage as building envelopes not completed
Privacy	Adverse visual and acoustic privacy impacts on surrounding residents.	<p>The following measures were to be applied to minimize the potential impacts of privacy:</p> <ul style="list-style-type: none"> <li>• Retention of existing trees contained to the north, north-east, east, and western boundaries to screen the proposal and prevent onlooking.</li> <li>• Proposed buildings achieve minimum setback distances.</li> <li>• Implementation of recommendations outlined within the Construction and Operational Noise Report.</li> </ul>	<p>Y</p> <p>Some noise impacts on surrounding residents are unavoidable due to the nature of construction work although we noted the retention and protection of existing trees and implementation of noise mitigation measures in the</p>
Parking	Demand for on-site staff car parking.	<ul style="list-style-type: none"> <li>• The following strategies will be employed by DoE to manage demand for on-site staff carparking:               <ul style="list-style-type: none"> <li>– Provision of 16 on-site staff car parking spaces, including 1 accessible space.</li> <li>– Provision of 68 on-site bicycle spaces.</li> <li>– Development of a Workplace Travel Plan and an Active Travel Guide.</li> <li>– Car-pooling initiatives.</li> <li>– Initiatives to encourage the utilisation of empty car parking spaces located on Abbott Road, Playfair Road, Ross Street and Lillie Street.</li> </ul> </li> </ul>	<p>To be assessed by PCA</p> <p>We note that the design provides for 27 on-site car parking spaces. Other aspects to be assessed by the PCA</p>

Aspect	Summary of predicted Impact	Summary of mitigation measures required	Actual impacts observed during audit period Consistent (Y/N)
Construction Vehicles	Adverse construction vehicle impacts on surrounding residents.	<p>The following measures were to be applied to minimize the potential impacts of privacy:</p> <ul style="list-style-type: none"> <li>• Implementation of measures outlined within the Traffic Control Plan.</li> <li>• All truck drivers will be provided with a copy of the proposed dedicated site access route.</li> <li>• Dedicated traffic controller will be employed at the construction vehicle access point off Playfair Road to direct traffic and uphold pedestrian safety.</li> </ul>	<p>Y</p> <p>There would be some unavoidable impacts of construction vehicles on surrounding residents, however, the site access controls were extremely good.</p>
Wind	Wind conditions at ground level student walkway areas.	<ul style="list-style-type: none"> <li>• The recommendations contained within Section 3.2 of the Wind Impact Assessment Report have been or can be incorporated into the final School design.</li> </ul>	To be assessed by PCA
Crime and Safety	Crime risk to safety of students, staff and visitors.	<ul style="list-style-type: none"> <li>• The proposed redevelopment incorporates CPTED principles to deter crime. Incorporated principles (which will be assessed by the PCA) include: <ul style="list-style-type: none"> <li>○ Incorporating an open palisade fence around the perimeter of the site.</li> <li>○ Ensuring that a strong teacher presence will be felt throughout the School.</li> <li>○ Incorporating sturdy and well-designed outdoor lighting fixtures, equipment and furniture;</li> <li>○ Providing balconies and windows at the upper levels of the proposed School buildings to ensure passive and informal surveillance is available onto surrounding streets</li> </ul> </li> </ul>	To be assessed by PCA

Aspect	Summary of predicted Impact	Summary of mitigation measures required	Actual impacts observed during audit period Consistent (Y/N)
Acoustic and Vibration	Noise generation during construction and operation of the School.	<p>The following measures were to be applied to minimize the potential impacts of privacy:</p> <ul style="list-style-type: none"> <li>• Implementation of recommendations contained within the Construction and Operational Noise Report.</li> <li>• Preparation of a Construction Noise and Vibration Management Plan.</li> </ul>	<p>Y</p> <p>Some impacts on sensitive receivers would be expected, however, the measures contained within the approved CNVMP were being implemented during</p>
Contamination	Disturbance of Asbestos materials.	<ul style="list-style-type: none"> <li>• Asbestos materials to be removed from the site prior to the commencement of any renovation/demolition works that may cause their disturbance.</li> <li>• Implementation of recommendations outlined within Section 12 of the Stage 1 Environmental Site Assessment, Section 6 of Hazardous Building Materials Survey and the Remediation Action Plan.</li> </ul>	<p>Y</p> <p>Some ACM materials have been removed from site prior to construction commencing and these are being managed as per the RAP and Site Auditor process</p>
Tree Protection	Construction impacts on retained trees.	<ul style="list-style-type: none"> <li>• Implementation of recommendations outlined within Section 6 of the Arboricultural Impact Assessment to ensure retained trees are protected during construction.</li> </ul>	<p>Y</p> <p>Trees were being protected as per the requirements of the Arboricultural Assessment</p>
Water Management	Impacts from stormwater.	<p>The Project is required to implement proposed stormwater concept, which includes:</p> <ul style="list-style-type: none"> <li>– Piped stormwater drainage system, to carry runoff from storms up to and including the 20-year ARI event.</li> <li>– Overland flow paths for runoff from storms up to and including the 100-year ARI event.</li> </ul>	<p>To be assessed by PCA</p>
Waste	Excessive waste generation.	<p>The Project is to ensure waste generated during construction for disposal to be removed by a licensed waste contractor and disposed of in a licensed landfill facility if/as required and implement the following measures:</p>	<p>N</p> <p>Excessive waste generation was not observed</p>

Aspect	Summary of predicted Impact	Summary of mitigation measures required	Actual impacts observed during audit period Consistent (Y/N)
		<ul style="list-style-type: none"> <li>• Segregate and recycle solid wastes generated by construction activities.</li> <li>• Reduce wastes by selecting, in order of preference, avoidance, reduction, reuse and recycling.</li> <li>• Make purchasing decisions that consider recycled products.</li> <li>• Consider measures and performance-based targets for reduction, reuse and recycling.</li> </ul>	

#### 4. Actions

The table below presents a summary of the findings from this IA and actions proposed or undertaken in response to the findings. The Audit Checklist provided in Appendix A presents details of all the evidence collected, observed and provided in support of a finding.

Item	Cond No	Type	Details of item	Proposed or completed action by the auditee	By whom and by when	Status
1	CoC A19	Non-compliance	<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> <ul style="list-style-type: none"> <li>a) make the following information and documents (as they are obtained or approved) publicly available on its website: <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> </ul> </li> </ul>	SINSW will identify which additional plans etc., need to be uploaded to website including but not limited CEMP, sub plans, Compliance Monitoring and Reporting Program etc.	SINSW 31 October	OPEN

			<p>ix. audit reports prepared as part of any independent environmental audit of the development and the Applicant's response to the recommendations in any audit report;</p> <p>x. any other matter required by the Planning Secretary; and</p> <p>b) keep such information up to date, to the satisfaction of the Planning Secretary.</p> <p><b><i>Not all of the approved strategies, plans and programs required under the conditions of this consent were available on either the Curl Curl North or School Infrastructure websites. Including but not limited to the Construction Environmental Management Plan and other sub plans, Complaints Register and Compliance Monitoring &amp; Reporting Program</i></b></p>			
2	CoC B27	Non-compliance	<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> <p>a) be prepared by a suitably qualified expert, in consultation with Council;</p> <p>b) describe all erosion and sediment controls to be implemented during construction;</p> <p>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); detail all off-Site flows from the Site; and</p> <p>d) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI).</p> <p><b><i>There was no evidence provided to indicate that the CSWMP had been prepared in consultation with Council as per a) above</i></b></p>	Plan to be provided to Council for consultation	ADCO 31 October	OPEN
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> <p>(a) between 7am and 6pm, Mondays to Fridays inclusive; and</p>	Email from ADCO Construction Manager on 9/7/19	ADCO	CLOSED

			<p>(b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays</p> <p><b>A complaint received on 3 July 2019 indicates that a concrete pour went beyond 6pm on that day</b></p>	<p>indicates that in response to complaint the concrete supplier was placed on notice that the Project will ensure that late deliveries are returned to supplier's premises</p>		
4	C38	Non-compliance	<p>The Department must be notified in writing to compliance@planning.nsw.qov.au within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Department in writing to compliance@planning-nsw.qov.au within seven days after they identify any non-compliance. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.</p> <p>A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance</p> <p><b>Works that occurred outside approved hours on 3 July 2019 was not reported to the Department within 7 days</b></p>	<p>SINSW to notify Department via compliance email address of any future non-compliances within 7 day</p> <p>Project Manager (Coffeys) has informed ADCO to notify Project Manager of any potential non-compliances as soon as they become aware of one</p> <p>Project Manager to inform SINSW of any future non-compliances as soon as they become aware</p>	SINSW Coffeys ADCO	CLOSED
5	C42	Non-compliance	<p>No later than 3 months after the date notified for the commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.</p>	<p>The Audit Program has been submitted. There are no further actions at this time.</p>	NA	CLOSED

			<p>On 15 April 2019 SINSW provided notification of commencement of construction for 17 April 2019.</p> <p>The auditors were engaged in August 2019 and the Audit Program was submitted to the Department on 29 August 2019. This is beyond the 3 months deadline specified by the condition.</p>			
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## 5. Conclusions

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 September 2019.

The overall outcome of the Independent Audit was positive. Compliance records were organised into separate folders for each Condition and the site inspection on 19 September 2019 provided good evidence of the implementation of environmental management plans on site.

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 assessed. 5 non-compliances were identified against the CoCs.

There were 3 positive findings made as a result of the audit in relation to:

- state-of-the-art site egress / ingress point
- highly innovative site information board
- MSDS labelling on fuel and chemical containers

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, Coffey and ADCO. The Auditor would like to thank the auditees for their 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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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 8310 Conditions of Consent

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
<b>Schedule 2</b>				
<b>Part A Administrative conditions</b>				
<b>Obligation to Minimise Harm to the Environment</b>				
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development.	Evidence provided below	Reasonable and feasible measures being implemented with some positive observations noted as per main report	C
<b>Terms of Consent</b>				
A2	The development may only be carried out: <ul style="list-style-type: none"> <li>a) in compliance with the conditions of this consent;</li> <li>b) in accordance with all written directions of the Planning Secretary;</li> <li>c) generally, in accordance with the EIS and Response to Submissions;</li> <li>d) in accordance with the approved plans in the table below:</li> </ul>	28-11-2018, Plans approved by NSW Government Planning and Environment	These stamped plans are the ones being used for the development	C

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	L301	D	Indicative Planting Schedule	17/08/2018			
	L302	A	Planting Zone Plan	17/08/2018			
	L303	D	Tree Removal and Retention	17/08/2018			
	L304	D	Tree Removal and Retention	17/08/2018			
	L305	D	Tree Removal and Retention	17/08/2018			
	<i>Stormwater Plans prepared by Woolacotts Consulting Engineers</i>						
	Dwg No.	Rev	Name of Plan	Date			
	SW1	-	Stormwater Management Plans and Details – Sheet 1	02/05/2018			
	SW2	A	Stormwater Management Plans – Sheet 2	02/05/2018			
	ES1	-	Erosion and Sediment Control Plan Sheet 1	02/05/2018			
	ES2	A	Erosion and Sediment Control Plan Sheet 2	02/05/2018			
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: <ol 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> </ol>				Interview with auditees 19/09/19	No directions known to have been given	NT
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict				These conditions of consent	This audit assess compliance with the conditions of consent.	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.				15-04-2019, NSW Govt Education School Infrastructure, Notification of Construction Commencement.	Construction commenced on 17 April 2019 which is well within the 5-year period	C
<b>Prescribed Conditions</b>							

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A6	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	Part 6, Division 8A of the EPAA Site signage 19/09/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	Part 6, Division 8A of the EPAA relates to prescribed conditions for: <ul style="list-style-type: none"> <li>- compliance with the BCA (Crown Certificates received)</li> <li>- erection of signs</li> <li>- residential building work (not relevant)</li> <li>- entertainment venues (not relevant)</li> <li>- signage for max number of persons (not relevant for construction)</li> <li>- shoring and adjoining properties (no properties are adjoined to the Project).</li> </ul>	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	Interview with auditees 19/09/19, consultation evidence in appendix C	No disputes have been identified.	NT
<b>Long Service Levy</b>				
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	27-02-2019, Bank Reference of Long Service Levy payment.	Payment made	C
<b>Legal Notices</b>				
A9	Any advice or notice to the consent authority must be served on the Planning Secretary.	Interview with auditees 19/09/19	No legal notices have been served.	NT
<b>Evidence of Consultation</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A10	Where conditions of this consent require consultation with an identified party, the Applicant must: <ul style="list-style-type: none"> <li>a) consult with the relevant party prior to submitting the subject document for information or approval; and</li> <li>b) provide details of the consultation undertaken including:               <ul style="list-style-type: none"> <li>i. the outcome of that consultation, matters resolved and unresolved; and</li> <li>ii. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</li> </ul> </li> </ul>	Evidence referred to elsewhere in this Audit Table.	Evidence of consultation on individual plans is detailed against specific CoA below	C
<b>Staging, Combining and Updating Strategies, Plans or Programs</b>				
A11	With the approval of the Planning Secretary, the Applicant may: <ul style="list-style-type: none"> <li>a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</li> <li>b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</li> <li>c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).</li> </ul>	Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19 PCA memo of 2/4/19 indicates that Planning Secretary has approved staging plan Approval by the department of the Application for the Staged Implementation of Compliance submitted in accordance with Condition A11a) (DOC19/274561)	The CEMP and sub plans and other documents reviewed cover the works contemplated under Stage 1 which is currently under construction.	C
A12	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.	Interview with auditees 19/09/19	No updates to the listed documents have occurred since their approval.	NT

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A13	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	PCA memo of 2/4/19 indicates that Planning Secretary has approved staging plan	<p>The CEMP and sub plans and other documents reviewed cover the works contemplated under Stage 1 which is currently under construction.</p> <p>No further updates have occurred at the time of the audit.</p>	C
<b>Demolition</b>				
A14	Demolition work must comply with <i>Australian Standard AS 2601-2001 The demolition of structures</i> (Standards Australia, 2001). The work plans required by AS 2601-2001 must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifying Authority before the commencement of works	<p>PCA Memo dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19</p> <p>Crown Certificate No. P217_095-1, 13/05/19</p> <p>26-02-2019, Titan Contractors, Example of Safe Work Method Statement, Work Activity: Hand Demolition Works &amp; Mechanical Demolition.</p> <p>26-02-2019, Sample, Form 12 Subcontractor SWMS Review</p>	The PCA has confirmed that this requirement has been met	C
<b>Structural Adequacy</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A15	<p>All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li>• Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</li> <li>• Under section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of Subsidence Advisory NSW's approval before carrying out certain development in a Mine Subsidence District</li> </ul>	<p>21-02-2019, Woolacotts Consulting Engineers, Structural Design Certificate. Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19</p>	<p>PCA has confirmed that this requirement has been met</p>	C
<b>External Walls and Cladding</b>				
A16	<p>The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.</p>	<p>13-06-2019, TKD Architects, Crown Certificate Requirements. Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19</p>	<p>PCA has confirmed that this requirement has been met</p>	C
<b>Applicability of Guidelines</b>				
A17	<p>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.</p> <p>However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.</p>	<p>The documents referred to elsewhere in this Audit Table</p>	<p>The documents prepared under the consent appear to refer to the standards and guidelines that are applicable to the document to which they relate.</p>	C
<b>Monitoring and Environmental Audits</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A18	<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, compliance reporting and independent auditing.</p> <p><i>Note: For the purposes of this condition, as set out in the EP&amp;A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i></p>	<p>Part 9, Div 9.4 of the EPAA Evidence referred to elsewhere in this Audit Table. PCA memo dated 2/4/19 indicates satisfaction with this requirement</p>	<p>The relevant section of the EPAA relates to (among other things) the need to be accurate, true (not misleading), properly conducted (approved methodology, calibrated etc) and with records retained.</p> <p>The evidence referred to throughout this Audit Table indicates that that monitoring and auditing is occurring consistent with this requirement.</p>	C
<b>Access to Information</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A19	<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> <ul style="list-style-type: none"> <li>a) make the following information and documents (as they are obtained or approved) publicly available on its website:               <ul style="list-style-type: none"> <li>i. the documents referred to in condition A2 of this consent;</li> <li>ii. all current statutory approvals for the development;</li> <li>iii. all approved strategies, plans and programs required under the conditions of this consent;</li> <li>iv. regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;</li> <li>v. a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</li> <li>vi. a summary of the current stage and progress of the development;</li> <li>vii. contact details to enquire about the development or to make a complaint;</li> <li>viii. a complaints register, updated monthly;</li> <li>ix. audit reports prepared as part of any independent environmental audit of the development and the Applicant's response to the recommendations in any audit report;</li> <li>x. any other matter required by the Planning Secretary; and</li> </ul> </li> <li>b) keep such information up to date, to the satisfaction of the Planning Secretary.</li> </ul>	<p>While the Communication Strategy and Pre-Construction Compliance Report and a link to the DPIE Major Projects website with the A2 documentation is available on the Curl Curl North Project website, none of the other the approved environmental plans or strategies are available on this site</p>	<p>Required documents are missing from the Project Website including, but not limited to, the CEMP and sub plans, complaints register, Compliance Monitoring and Reporting Program</p>	NC
<b>Compliance</b>				
A20	<p>The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development</p>	<p>12-05-19 ADCO Subcontract detailing A20 requirements.</p>	<p>Subcontract contains references to CoA</p>	C
<b>ADVISORY NOTES</b>				
AN1	<p>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.</p>		<p>Noted</p>	C
<b>PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION</b>				
<b>Design Modifications</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B1	Prior to commencement of Stage 1 construction works, the Applicant must prepare amended plans to include six additional car parking spaces adjacent to the proposed staff car park area fronting Abbott Road (total 27 car parking spaces). Amended plans must be submitted to the Planning Secretary. Alternatively, written evidence must be provided to the Planning Secretary that an agreement has been reached for the use of the on-street car parking spaces on the southern side of Abbott Road adjoining the John Fisher netball courts during school hours (8:30am – 4pm, Monday to Friday during school terms only).	16-04-2019 Letter and plans submitted to Mr Jim Betts, Planning Secretary, DPE.	Letter demonstrates achievement of 27 car parking spaces in design.	C
<b>Notification of Commencement</b>				
B2	The Department must be notified in writing of the dates of commencement of physical work and operation at least 48 hours before those dates. If the construction or operation of the development is to be staged, the Department must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	15-04-2019, NSW Govt Education School Infrastructure, Notification of Construction Commencement.	Letter advises commencement of construction on 17 April	C
<b>Certified Drawings</b>				
B3	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifying Authority structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with: <ul style="list-style-type: none"> <li>a) the relevant clauses of the BCA; and</li> <li>b) this development consent.</li> </ul>	5-03-2019, Woolacotts Consulting Engineers, Structural Design Certificate. PCA memo dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA has confirmed that this requirement has been met	C
<b>External Walls and Cladding</b>				
B4	Prior to the commencement of construction, the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA. The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it.	4-03-2019, TKD Architects, Façade Systems Fire Safety Compliance Statement. Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA has confirmed that this requirement has been met	C
<b>Protection of Public Infrastructure</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B5	<p>Before the commencement of construction, the Applicant must:</p> <ul style="list-style-type: none"> <li>a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;</li> <li>b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</li> <li>c) submit a copy of the dilapidation report to the Certifying Authority and Council.</li> </ul>	4-02-2019, James Townsend Dilapidation Surveys Pty. Ltd., Dilapidation Survey Report. Email from Council on 11/2/19 evidencing receipt of report. PCA memo dated 2/4/19	Dilapidation reports were prepared and submitted to identified stakeholders prior to construction.	C
<b>Site Contamination</b>				
B6	Hazardous ground gas (HGG) monitoring must be undertaken in accordance with Section 4 of the <i>Remedial Action Plan</i> dated 8 October 2018 and prepared by Environmental Investigation Services.	20-02-2019, Environmental Investigation Services Report. . 3-12-2018, EIS, Preliminary HGG and Groundwater Assessment – Summary Letter.	Section 4 of the EIS Report includes HGG Monitoring procedures. Evidence of HGG monitoring having been undertaken is provided in preliminary assessment report	C
B7	The Remedial Action Plan dated 8 October 2018 and prepared by Environmental Investigation Services must be amended to include additional remediation measures in accordance with the results of the HGG monitoring. The amended plan must be submitted to the Certifying Authority for approval and a copy submitted to the Planning Secretary.	20-02-2019, Environmental Investigation Services Report Memo from PCA of 2/4/19. Letter from SINSW to DPIE on 16 April 2019 submitting RAP	Section 4 of the EIS Report includes HGG Monitoring procedures. Memo from PCA of 2/4/19 indicates receipt of RAP  The Rap was submitted to DPIE.	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B8	The Applicant must undertake a Hazardous Materials Assessment (Hazmat) and prepare a register of hazardous materials (including asbestos and polychlorinated biphenyl capacitors (PCBs)) to ensure that asbestos and any other hazardous materials contained in buildings to be demolished (including PCB capacitors) are removed and validated by an appropriately qualified occupational hygienist prior to demolition works. A copy of the Hazmat must be submitted to the Certifying Authority and a copy provided to the Planning Secretary.	November 2016, Hibbs and Associates Pty Ltd, Hazardous Building Materials Survey. Memo from PCA of 2/4/19 indicates receipt of Hazmat assessment. Letter from SINSW to DPIE on 16 April 2019 submitting Assessment	HAZMAT report prepared and submitted to PCA and DPIE	C
B9	After the completion of the demolition works and prior to the commencement of the construction works, additional investigation, including the footprint of relocated and demolished structures and underground utilities should be undertaken and the scope of that investigation detailed in a sampling and analysis quality plan to be provided to the site auditor for review and approval.	8-05-2019, EIS, Asbestos Clearance Certificate Area A2. 6-5-2019, EIS, Asbestos Clearance Certificate Area A1. 7-05-2019, Clearsafe Environmental Solutions, Air Monitoring Certificate [4-5-19 to 6-5-19].  RAMBOLL, Interim Audit Advice Letter No. 1 – Curl Curl North Public School Remedial Action Plan, 22/2/19	Site Auditor's letter of 22/2/19 endorses sampling and analysis plan as part of RAP	C
B10	Remediation approved as part of this development consent must be carried out in accordance with the <i>Remedial Action Plan</i> dated 8 October 2018 and prepared by Environmental Investigation Services.	20-02-2019, EIS, Remedial Action Plan, Rev4.1	Remediation is ongoing and the completion of the Preliminary Hazardous Ground Gas And Groundwater Assessment and involvement of the Site Auditor is evidence of this	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B11	The Applicant must engage a Site Auditor in accordance with the requirements of the <i>Contaminated Land Management Act 1997</i> for the purposes of Remediation Work.	22-02-2019, Ramboll, Rowena Salmon, EPA Accredited Site Auditor Professional Agreement for services dated 22/2/19 sighted	The Site Auditor has been engaged.	C
B12	The <i>Remedial Action Plan</i> dated 8 October 2018 and prepared by Environmental Investigation Services must be updated to include additional remediation and validation strategies to address the results of the additional reviews and the results of the HGG monitoring. Further details of the proposed remediation and validation strategies must be provided to the Site Auditor in a Works Plan and a Validation Sampling and Analysis Quality Plan (VSAQP) for review and approval, prior to remediation works commencing. A copy of the approved document must be provided to the Certifying Authority.	Remedial Action Plan For Proposed Curl Curl North Public School Redevelopment dated 22/2/19	RAP updated and endorsed by Site Auditor in Interim Advice dated 22/2/19	C
B13	An asbestos management plan (AMP) must be prepared and submitted to the Site Auditor for review and approval. The AMP must satisfy the requirements of the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> with particular reference to Part 7 'asbestos wastes'.	22-02-2019, Ramboll, Interim Audit Advice Letter No 1	Ramboll, Interim Audit Advice Letter No 1 includes reference to Asbestos Management Plan' (AMP), dated 19 February 2019 and indicates acceptance of plan	C
B14	Upon completion of remedial works, the Applicant must submit a Site Audit Report and Section A Site Audit Statement for the relevant part of the site prepared by a NSW EPA accredited Site Auditor. The Site Audit Report and Section A Site Audit Statement must verify the relevant part of the site is suitable for the purpose of an educational establishment and be provided to the satisfaction of the Certifying Authority.	Site inspection 19/09/19	Remediation works ongoing	NT
<b>Unexpected Contamination Procedure</b>				
B15	Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition B22 and must ensure any material identified as contaminated must be managed in accordance with the recommendations in the <i>Remedial Action Plan</i> dated 8 October 2018 and results of testing submitted to the Planning Secretary, prior to its removal from the site.	Remedial Action Plan For Proposed Curl Curl North Public School Redevelopment dated 22/2/19	Unexpected Finds procedure contained in RAP referred to in CEMP	C
<b>Utilities and Services</b>				
B16	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Site inspection 19/09/19 Interview with auditees 19/09/19	No third party utility works had commenced	NT

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B17	Prior to the commencement of above ground works written advice must be obtained from the electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.	Ausgrid letter dated 17/9/18, Jemena letter dated, 22-05-2019, My Gas Services, Provision of meter/service upgrade/downgrade.	Letters indicate that services will and can be provided on completion of upgrade.	C
<b>Community Communication Strategy</b>				
B18	<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> <ol 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: <ol 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> </ol> </li> </ol> <p>The Community Communication Strategy must be submitted to the Planning Secretary for approval no later than one month before the commencement of any work.</p> <p>Work for the purposes of the development must not commence until the Community Communication Strategy has been approved by the Planning Secretary, or within another timeframe agreed with the Planning Secretary.</p>	<p>CCS March 2019 available on website and includes required content</p> <p>DPIE letter of approval 01/04/19</p>	<p>The CCS was initially submitted 22/02/19 (&gt;1 month prior to construction) and resubmitted on 28/03/19. It was approved by DPIE on 01/04/19.</p>	C
<b>Ecologically Sustainable Development</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B19	Prior to the commencement of construction, the Applicant must submit details of all design measures to the satisfaction the Certifying Authority demonstrating the proposal incorporates ecologically sustainable development initiatives as outlined in <i>ESD Report</i> prepared by UMOW Consulting Engineers dated 01 May 2018.	13-06-2019, ESD Report, Umow Lai. PCA memo dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA notes that amendment of ESD report required. PCA approval provided through issue of CC.	C
<b>Outdoor Lighting</b>				
B20	Prior to commencement of construction, all outdoor lighting within the site must comply with AS 1158.3.1:2005 Lighting for roads and public spaces- Pedestrian area (Category P) lighting - Performance and design requirements and AS 4282-1997 Control of the obtrusive effects of outdoor lighting. Details demonstrating compliance with these requirements must be submitted to the satisfaction of the Certifying Authority	10-05-2019, Shelmerdines Consulting Engineers, Certificate of Design Electrical Services. Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA approval provided through issue of CC.	C
<b>Access for People with Disabilities</b>				
B21	The works that are the subject of this application must be designed and constructed to provide access and facilities for people with a disability in accordance with the BCA. Prior to the commencement of construction, the Certifying Authority must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.	6-8-19, Design Confidence, BCA / Access Capability Statement Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA approval provided through issue of CC.	C
<b>Construction Environmental Management Plan</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B22	<p>Prior to commencement of construction, the Applicant must prepare a <b>Construction Environmental Management Plan (CEMP)</b> and it must include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>a) Details of: <ul style="list-style-type: none"> <li>i. hours of work;</li> <li>ii. 24-hour contact details of site manager;</li> <li>iii. management of dust and odour to protect the amenity of the neighbourhood;</li> <li>iv. stormwater control and discharge;</li> <li>v. measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;</li> <li>vi. groundwater management plan including measures to prevent groundwater contamination;</li> <li>vii. external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting;</li> <li>viii. community consultation and complaints handling;</li> </ul> </li> <li>b) Construction Traffic and Pedestrian Management Sub-Plan (see condition B24);</li> <li>c) Construction Noise and Vibration Management Sub-Plan (see condition B25);</li> <li>d) Construction Waste Management Sub-Plan (see condition B26);</li> <li>e) Construction Soil and Water Management Sub-Plan (see condition B27);</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>20-12-2018, ADCO, Environmental Management Plan,</p> <p>13-2-19, Construction Traffic and Pedestrian Management Plan, Craig Reeves, Sydney Traffic Control.</p> <p>February 2019, Wilkinson Murray, Construction Noise &amp; Vibration Management Plan, Report 17072-A, Version B.</p> <p>17-04-2019, Waste Management Plan, ADCO.</p> <p>19-02-2019, EIS, Asbestos Management Plan.</p> <p>Sediment &amp; Erosion Control Plan prepared by Woolacotts (May 2018)</p>	<p>The Construction Environmental Management Plan suite of documents address the requirements</p>	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B23	The Applicant must not commence construction of the development until the <b>CEMP</b> is approved by the Certifying Authority and a copy submitted to the Planning Secretary.	20-12-2018, ADCO, Environmental Management Plan Memo from PCA dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	Memo from PCA dated 2/4/19 indicates CEMP was submitted to DPIE. PCA approval provided through issue of CC.	C
B24	The <b>Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP)</b> must address, but not be limited to, the following: <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) indicate that the construction vehicles are restricted to heavy rigid vehicles (HRV);</li> <li>f) include a Driver Code of Conduct to: <ul style="list-style-type: none"> <li>i. minimise the impacts of earthworks and construction on the local and regional road network;</li> <li>ii. minimise conflicts with other road users;</li> <li>iii. minimise road traffic noise; and</li> <li>iv. ensure truck drivers use specified routes;</li> </ul> </li> <li>g) include a program to monitor the effectiveness of these measures;</li> <li>h) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes;</li> <li>i) all demolition and construction vehicles and construction worker vehicles must enter the Site before stopping; and</li> <li>j) the swept path of the longest construction vehicle entering and exiting the Site in association with the new work, must be in accordance with AUSTRROADS.</li> </ul>	13-2-19, Construction Traffic and Pedestrian Management Plan, Craig Reeves, Sydney Traffic Control.	CTPMSP addresses requirements of condition	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B25	<p>The <b>Construction Noise and Vibration Management Sub-Plan (CNVMPSP)</b> 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 <i>Interim Construction Noise Guideline</i> (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 B25d); and</li> <li>f) include a complaints management system that would be implemented for the duration of the construction.</li> </ul>	February 2019, Wilkinson Murray, Construction Noise & Vibration Management Plan, Report 17072-A, Version B. a), b), c), d), e), f)	CNVMPSP addresses requirements of condition	C
B26	<p>The <b>Construction Waste Management Sub-Plan (CWSMP)</b> must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations;</li> <li>b) removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works.</li> </ul>	17-04-2019, Waste Management Plan, ADCO. a), 19-02-2019, EIS, Asbestos Management Plan. b)	CWSMP addresses requirements of condition	C
B27	<p>The Applicant must prepare a <b>Construction Soil and Water Management Plan (CSWMSP)</b> 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); detail all off-Site flows from the Site; and</li> <li>d) 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>	Sediment & Erosion Control Plan prepared by Woolacotts (May 2018)	Plan has not been provided to Council for consultation	NC
<b>Construction Parking</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B28	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 only utilise residential streets or public parking facilities.	A large stabilised pad has been provided within the site for heavy & delivery vehicle parking (Plate 1B)	This condition is inconsistent with CoA C13 as under that condition worker vehicles are not required to be parked within the site. The site area is extremely limited and parking worker vehicles within the site would be practically impossible and unsafe.	C
<b>Road Design and Traffic Facilities</b>				
B29	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.	Site inspection 19/09/19	No road or pavement works have commenced.	NT
<b>Flood Management</b>				
B30	Prior to the commencement of construction, the Certifying Authority must be satisfied that all floor levels must be designed in accordance with Condition A2 and the recommendations of the <i>Flood Risk Assessment Report</i> prepared by Woolacotts Consulting Engineers dated 16 May 2018.	19-03-2019 TKD Architects, Flood Risk Assessment Design Compliance PCA memo dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA approval provided through issue of CC.	C
B31	Detailed drainage plans must be prepared by a suitably qualified Civil Engineer and be submitted to the Certifying Authority for approval.	Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA approval provided through issue of CC.	C
<b>Operational Noise- Design of Mechanical Plant and Equipment</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B32	Prior to commencement of works for each construction stage, the Applicant must incorporate the noise mitigation recommendations in the <i>Curl Curl North Public School Construction and Operational Noise Report</i> prepared by Wilkinson Murray dated May 2018 into the detailed design drawings, relevant to that stage of work. 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 <i>Curl Curl North Public School Construction and Operational Noise Report</i> by Wilkinson Murray dated May 2018.	26-06-2019 Wilkinson Murray, Design Statement Mechanical Services – Acoustics. Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA approval provided through issue of CC.	C
<b>Construction and Demolition Waste Management</b>				
B33	The Applicant must notify the RMS Traffic Management Centre of the truck routes 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.	13-05-2019, Email to RMS Traffic Management Centre, notifying truck routes.	RMS TMC have been notified of the routes.	C
<b>Operational Waste Storage and Processing</b>				
B34	The Applicant must design the operational waste storage area in accordance with the <i>Operational Waste Management Plan</i> prepared by Foresight Environmental dated 26 April 2018.	26-04-2018 Foresight Environmental, Operational Waste Management Plan. PCA memo dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA approval provided through issue of CC.	C
<b>Mechanical Ventilation</b>				
B35	All mechanical ventilation systems must be designed in accordance with Part F4.5 of the BCA and must comply with the AS 1668.2-2012 <i>The use of air-conditioning in buildings – Mechanical ventilation in buildings</i> and AS/NZS 3666.1:2011 <i>Air handling and water systems of buildings-Microbial control</i> 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.	27-5-2019, VENT Mechanical Services, Certificate of Design – Mechanical Services. Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA approval provided through issue of CC	C
<b>Rainwater Harvesting</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B36	Prior to the commencement of construction, the Applicant must ensure that a rainwater reuse/harvesting system for the development is developed for the site. A rainwater re-use plan must be prepared and certified by an experienced hydraulic engineer.	12-03-2019, Woolacotts Consulting Engineers, Hydraulic Design Statement. PCA memo dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA approval provided through issue of CC	C
<b>Roadworks and Access</b>				
B37	Prior to the commencement of construction, the Applicant must submit design plans to the satisfaction of the relevant roads authority which demonstrate that the proposed access to the development on Abbott Road is designed in accordance with latest version of AS2890.1.	20-05-2019, Phillip Devon, Manager Transport Network, Northern Beaches Council.	Northern Beaches Council stated plans submitted satisfy B37 & B38.	C
B38	Prior to the commencement of construction, the Applicant must submit design plans to the satisfaction of the relevant roads authority which demonstrate that the proposed access to the waste collection area on Playfair Road is designed to accommodate an 8.8m long medium rigid vehicle in accordance with latest version of AS2890.2.	20-05-2019, Phillip Devon, Manager Transport Network, Northern Beaches Council.	Northern Beaches Council stated plans submitted satisfy B37 & B38.	C
B39	Prior to the commencement of specific works for vehicular crossings and driveways, the Applicant must comply with the following: <ul style="list-style-type: none"> <li>a) an application for driveway levels be made with Council;</li> <li>b) design plans to demonstrate that the new vehicular crossings are at least 4 metres(m) wide in accordance with Northern Beaches Council Specifications; and</li> <li>c) the property boundary levels to match the existing levels except where modified for the vehicular crossing.</li> </ul> Copies of the approved documents must be submitted to the satisfaction of the Certifying Authority.	27-02-2019, Traffix, Certification. 29-05-2019, Northern Beaches Council, Authorisation – Street Levels Application. Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA approval provided through issue of CC	C
<b>Car Parking and Service Vehicle Layout</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B40	<p>Compliance with the following requirements must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction:</p> <ul style="list-style-type: none"> <li>a) all vehicles within the staff car-parking area fronting Abbott Road must enter and leave the Site in a forward direction;</li> <li>b) a total of 27 on-site car parking spaces for use by staff members during operation of the development and designed in accordance with the latest version of AS2890.1 unless other arrangements are made with Council; and</li> <li>c) all parking spaces for service vehicles are designed in accordance with AS2890.2 – 2002 (for an 8.8m long medium rigid vehicle).</li> </ul>	<p>27-02-2019, Traffix, Certification. PCA memo dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19</p>	<p>PCA approval provided through issue of CC</p>	C
<b>Bicycle Parking and End-of-Trip Facilities</b>				
B41	<p>Compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction:</p> <ul style="list-style-type: none"> <li>a) the provision of a minimum 20 staff and 49 student 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 such as unisex toilet facilities;</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>	<p>6-6-2019, Context, Condition B41 Statement. Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19</p>	<p>PCA approval provided through issue of CC</p>	C
<b>Public Domain Works</b>				
B42	<p>Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifying Authority that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from Council to the Certifying Authority.</p>	<p>25-03-2019. Northern Beaches Council, Public Domain plans satisfy Council requirements. PCA memo dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19</p>	<p>PCA approval provided through issue of CC</p>	C
<b>Compliance Reporting</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B43	No later than two weeks before the date notified for the commencement of construction, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority. Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018). The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the Certifying Authority in writing at least seven days before this is done.	PCCR on website DOC19/239249 Letter from SINSW to DPE on 22 March 2019 including CMRP doc reference DOC19/204122	The Compliance Monitoring and Reporting Program was prepared and submitted prior to the specified deadline. A Pre-Construction Compliance Report was prepared and submitted prior to construction.	C
B44	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.	Site inspection 19/09/19	Operations have yet to commence	NT
<b>Sydney Water Compliance</b>				
B45	The approved plans must be submitted to the Sydney Water Tap in online service to determine whether the development the development will affect any Sydney Water sewer or water main, stormwater drains and / or easement, and if further requirements need to be met.	12-03-2019, Woolacotts Consulting Engineers, Hydraulic Design Statement. 3-7-2018, Sydney Water, Building Plan Assessment – Approved. PCA memo dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA verified that this has occurred through issue of CC	C
<b>Pre-Construction Dilapidation Report</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B46	The applicant must prepare and submit a pre-commencement dilapidation report providing an accurate record of the existing condition of adjoining private properties. A copy of the report must be provided to Council and the owners of adjoining and affected private properties.	02-04-2019, Design Confidence Sydney Pty Ltd, Dilapidation Reports acceptable. PCA memo dated 2/4/19 Council acceptance email 27/02/19 28-03-2019, James Townsend Dilapidation Surveys, Curl Curl North P. S. Block A, photos of building and street scapes. Email from Council 11/2/19 acknowledging receipt of report	Dilpidation reports were prepared and submitted to Council 26/02/19 (accepted by Council 27/02/19). Compliance assessed by PCA as closed out by PCA on 2/4/19	C
B47	Footings of any structure adjacent to an easement or pipeline must be designed in accordance with Council's Water Management Policy. Any proposed landscaping within a Council easement or over a drainage system must consist of ground cover or turf only.	18-04-2017, Context, Condition B47 Statement.	Statement by Context indicates compliance with requirements	C
B48	Structural details prepared by a suitably qualified Civil Engineer demonstrating building compliance are must be submitted to the Certifying Authority for approval.	02-04-2019, Design Confidence, Acceptance of Structural Certificate for B48. PCA memo dated 2/4/19 Crown Certificate No. P217_095-2, 27/06/19 Crown Certificate No. P217_095-1, 13/05/19	PCA approval provided through issue of CC	C
<b>Archival Recording</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B49	The Applicant must complete archival recordings for all existing buildings within the site that are proposed to be removed or directly and/or physically altered by the proposed development. Archival recordings are to include photographic recording of the intact buildings. Copies of the photographic records are to be provided to Council and the Certifying Authority for information.	28-03-2019, James Townsend Dilapidation Surveys, Curl Curl North P. S. Block A, photos of building and street scapes. Email from Council 11/2/19 acknowledging receipt of report	Report provided. Evidence of submission of report to Council provided	C
<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.	Aconex and site inspection 19/09/19.	Plans available via Aconex and hard copies in folders on site	C
<b>Site Notice</b>				
C2	A site notice(s): (a) must be prominently displayed at the boundaries of the site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifying Authority and Structural Engineer. (b) is to satisfy all but not be limited to, the following requirements: i. minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size; ii. the notice is to be durable and weatherproof and is to be displayed throughout the works period; iii. the approved hours of work, the name of the site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and iv. the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the site is not permitted.	Image of site notice  Plate 12	A site notice, compliant with this condition was sighted.	C
<b>Operation of Plant and Equipment</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C3	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>	Premobilisation checklists for plant (e.g. Boomlift on 12/9/19) and Prestart checklist for plant. HammerTech online tool	Premobilisation checklists for plant brought on site were sighted (e.g. Boomlift on 12/9/19) and Prestart checklist for plant also sighted (including electrical equipment, vehicles, pump etc). System is managed using HammerTech	C
<b>Demolition</b>				
C4	Demolition work must comply with Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifying Authority before the commencement of works.	26-02-2019, Titan Contractors, Example of Safe Work Method Statement, Work Activity: Hand Demolition Works & Mechanical Demolition.  26-02-2019, Sample, Form 12 Subcontractor SWMS Review	Compliance assessed by PCA Noting that Stage 1 demolition works had been completed prior to audit	C
<b>Construction Hours</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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>	<p>Email from member of public dated 3/7/19 to SINSW email complaint address raises complaint regarding concrete delivery at 7 pm</p> <p>Email from ADCO Construction Manager on 9/7/19 indicates that in response to complaint the concrete supplier was placed on notice that the Project will ensure that late deliveries are returned to supplier's premises</p>	<p>The complaint received on 3 July 2019 indicates that work took place outside the hours permitted under this condition. Refer response to condition C38 also.</p>	NC
C6	<p>Activities may be undertaken outside of the hours in condition C5 if required:</p> <ul style="list-style-type: none"> <li>(a) by the Police or a public authority for the delivery of vehicles, plant or materials; or</li> <li>(b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or</li> <li>(c) where the works are inaudible at the nearest sensitive receivers; or</li> <li>(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.</li> </ul> <p>Notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards.</p>	<p>Interview with auditees 19/09/19</p>	<p>No planned OOHW required to date Refer response to condition C5 and C38</p>	NT
C7	<p>Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:</p> <ul style="list-style-type: none"> <li>(a) 9am to 12pm, Monday to Friday;</li> <li>(b) 2pm to 5pm Monday to Friday; and</li> <li>(c) 9am to 12pm, Saturday.</li> </ul>	<p>Interview with auditees 19/09/19 Site inspection 19/09/19</p>	<p>None of these activities have occurred.</p>	NT

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C8	Construction vehicles must not access the site during the following hours: (a) a) 8:30am and 9:30am, Mondays to Fridays inclusive; and (b) b) 3pm and 4pm, Mondays to Fridays inclusive.	20-12-2018, ADCO, Environmental Management Plan. Project Specific Information and Sub contractor meeting minutes agenda sighted	The restricted hours have been communicated to the workforce. No issues observed.	C
C9	Deliveries by oversized vehicles may be undertaken outside of these hours where: a) it is the delivery to or transport from the development site of oversize plant, equipment and structural elements outside standard construction hours, subject to: (i) deliveries / collection not being undertaken on a Sunday or public holiday; (ii) oversize plant, equipment and structural elements not being readied for transport, loaded or unloaded, set up or installed other than during the standard construction hours, and (iii) the proponent notifying noise sensitive receivers, especially residences, likely to be affected by noise from any delivery or transport activity permitted by this condition of that delivery not less than 3 days and not more than 7 days before the delivery is undertaken.  <b>Note:</b> <i>'oversize' for the purposes of this condition, means exceeding dimensions prescribed for vehicles such that the vehicle transporting the oversize plant, equipment or structural element would require conditional registration by the RMS and would be subject to restrictions imposed by the RMS that require the vehicle to operate on a public road outside the standard construction hours.</i> <i>'structural element' for the purposes of this condition, means a pre-fabricated structural component that is not comprised of smaller components and which is unable to be divided, broken down or otherwise disassembled to enable transport during the standard construction hours."</i>	13-2-19, Construction Traffic and Pedestrian Management Plan, Craig Reeves, Sydney Traffic Control. Interview with auditees 19/09/19	No OSOM deliveries had occurred at the time of the audit.	NT
<b>Implementation of Management Plans</b>				
C10	The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	09-09-2019, Weekly Site Inspection Document.	Weekly site inspections evidence of monitoring of construction in accordance with CEMP	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C11	Additional investigation, including the footprint of relocated and demolished structures and underground utilities should be undertaken and the scope of that investigation detailed in a sampling and analysis quality plan to be provided to the site auditor for review.	Remedial Action Plan For Proposed Curl Curl North Public School Redevelopment dated 22/2/19 Site Auditor in Interim Advice dated 22/2/19	RAP updated and endorsed by Site Auditor in Interim Advice dated 22/2/19. Remediation is ongoing with the involvement of the Site Auditor	NT
<b>Construction Traffic</b>				
C12	All construction vehicles (excluding worker vehicles) are restricted to be heavy rigid vehicles (HRV) only.	13-2-19, Construction Traffic and Pedestrian Management Plan, Craig Reeves, Sydney Traffic Control.	Site is not accessible to such vehicles	C
C13	The 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.	13-2-19, Construction Traffic and Pedestrian Management Plan, Craig Reeves, Sydney Traffic Control.	Construction vehicles observed to be contained within site with parking available on stabilised pad (Plate 1B) and access gate closed. No heavy vehicles observed to be parked offsite during site audit	C
<b>Road Occupancy Licence</b>				
C14	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	13-2-19, Construction Traffic and Pedestrian Management Plan, Craig Reeves, Sydney Traffic Control. Site inspection 19/09/19	No works observed to be impacting traffic.	NT
<b>SafeWork Requirements</b>				
C15	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 inspection 19/09/19	Site securely fenced and main access gate shut during site audit	C
<b>Hoarding Requirements</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C16	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>	Site inspection 19/09/19	Site hoarding contained only site-specific information and no graffiti was observed	C
<b>No Obstruction of Public Way</b>				
C17	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under and circumstances. Non-compliance with this requirement will result in the issue of a notice by the relevant Authority to stop all works on site.	Site inspection 19/09/19.	No such obstructions noted on day of inspection. Construction vehicles provided with access to site and parked within site	C
<b>Construction Noise Limits</b>				
C18	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.	20-09-2019, Toolbox Talk, Noise Level Awareness noted. Site inspection 19/09/19. Complaints register on website.	20-09-2019, Toolbox Talk, Noise Level Awareness noted. Noise hoarding including additional sound proofing noted on site (Plate 7) Signage regarding swearing observed (Plate 9)	C
C19	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of audible movement alarms of a type that would minimise noise impacts on surrounding noise sensitive receivers.	Site inspection 19/09/19	Non tonal reversing alarms on mobile plant were observed on site	C
C20	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.	Interview with auditees 19/09/19.	No rock breaking required and only limited concrete cutting	C
<b>Vibration Criteria</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C21	Vibration caused by construction at any residence or structure outside the site must be limited to: <ul style="list-style-type: none"> <li>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</li> <li>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).</li> </ul>	Site inspection 19/09/19	No piling was permitted during school hours and no vibration intensive plant in Table 7-1 of CNVMSP was used on site (apart from piling which was well within the safe working distance from nearest receivers) No issues observed on site.	C
C22	Vibratory compactors must not be used closer than 30m from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C21 or with the Construction Noise and Vibration Management Sub-Plan.	Site inspection 19/09/19.	Vibratory compactor used on area B containment cell which is located 60m to nearest residence Compliant as separation distance achieved	C
C23	The limits in conditions C21 and C22 apply unless otherwise outlined in a Construction Noise and Vibration Management Sub-Plan, approved as part of the CEMP required by condition B22 of this consent.	Refer evidence sighted in condition B22, C21 and C22	Refer finding to condition B22, C21 and C22.	C
<b>Tree Protection</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C24	<p>For the duration of the construction works:</p> <ul style="list-style-type: none"> <li>(a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property;</li> <li>(b) all street trees must be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council;</li> <li>(c) all trees on the site and the neighbouring properties that are not approved for removal must be suitably protected during construction as per recommendations of the Arboricultural Impact Assessment Report prepared by Bluegum dated April 2018;</li> <li>(d) native trees that are proposed to be removed from the site including tree trunks that are greater than 25 – 30 centimetre (cm) and 3m in length, must be salvaged and used to enhance habitat within the site;</li> <li>(e) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required; and</li> <li>(f) The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.</li> </ul>	<p>20-12-2018, ADCO, EMP 6-9-2019, Excerpt from Woolacotts, Tree Protection Zones.</p> <p>Tree protection zones in place (Plate 2) 19/09/19</p> <p>Interview with auditees 19/09/19</p>	<p>All trees to be retained were observed to be adequately protected.</p>	C
<b>Dust Minimisation</b>				
C25	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	20-12-2018, ADCO, EMP Site inspection 19/09/19	Water cart observed on site	C
C26	<p>During construction, the Applicant must ensure 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>	20-12-2018, ADCO, EMP Site inspection 19/09/19	<p>Water cart observed on site.</p> <p>No mud tracking observed offsite</p> <p>Very high-quality site egress / ingress controls observed</p>	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.	June 2018, Woolacotts, Erosion and Sediment Control Plan - Stage 1. Site inspection 19/09/19	Sediment and erosion controls in place and maintenance in progress at time of inspection following recent heavy rain events Controls in place and held up well during heavy rainfall events prior to inspection (Plates 1A & B, 10, 13 & 15)	C
<b>Imported Soil</b>				
C28	The Applicant must: <ul style="list-style-type: none"> <li>(a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site;</li> <li>(b) keep accurate records of the volume and type of fill to be used; and</li> <li>(c) make these records available to the Certifying Authority upon request.</li> </ul>	10-09-2019, Envirolab Services, Certificate of Analysis 222869.  12-8-2019, NSW EPA, Certification of VENM, Hy-Tec Industries.  06-08-2019, ERM, Site Inspection of VENM.  12-07-2019, Envirolab Services, Certificate of Analysis 221138.  CCNPS Material Imported Register.  08-07-2019, Compaction and Soil Testing Services Pty Ltd, Proof Roll Report.  26-06-2019, Ford Civil Contracting Pty Ltd, ITP/Construction Checklist.	Records in indicate compliance with this condition	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
<b>Disposal of Seepage and Stormwater</b>				
C29	Any seepage or rainwater collected on-site during construction or groundwater must not be pumped to the street stormwater system unless separate prior approval is given in writing by the EPA in accordance with the Protection of the Environment Operations Act 1997.	Site inspection 19/09/19 Interview with auditees 19/09/19	No discharge has been required.	NT
<b>Unexpected Finds Protocol- Aboriginal Heritage</b>				
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.	20-12-2018, ADCO, EMP. Interview with auditees 19/09/19	No unexpected finds to date.	NT
<b>Waste Storage and Processing</b>				
C31	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.	26-04-2018, Foresight Environmental, Operational Waste Management Plan. Site inspection 19/09/19	Waste storage receptacles observed on site Plate 14 No litter observed on site or blowing outside site	C
C32	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	26-04-2018, Foresight Environmental, Operational Waste Management Plan. BINGO waste receipts.	Bingo waste receipts indicated waste is classified and managed appropriately	C
C33	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.	26-04-2018, Foresight Environmental, Operational Waste Management Plan. Site inspection 19/09/19	No vehicles can leave site until inspected and gate opened	C

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C34	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.	26-04-2018, Foresight Environmental, Operational Waste Management Plan. Site inspection 19/09/19	Concrete waste disposed into tray to dry Plate 16	C
<b>Handling of Asbestos</b>				
C35	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.	08-10-2018, EIS, Remedial Action Plan.  21-05-2019, EIS, Asbestos Clearance Certificate.  22-05-2019, Ford Civil, Construction Checklist. 23-04-2019, Ford Civil SWMS, Compaction and Spreading ACM Soils in Containment Cell.  29-03-2019, Titan Contractors, Demolition Plan.	No asbestos waste encountered during construction. Appropriate clearance certificates obtained during demolition	C
<b>Community Engagement</b>				
C36	The Applicant must consult with the community regularly throughout construction, including consultation with the nearby sensitive receivers identified on the <i>Construction and Operational Noise Report</i> prepared by Wilkinson Murray dated May 2018, the users of the Curl Curl North Public School, relevant regulatory authorities and other interested stakeholders.	Meeting Minutes for the PRG 40 Meeting – Curl Curl North Public School 30/8/19. Letterbox drops 12/8/19	Meeting Minutes for the PRG 40 Meeting – Curl Curl North Public School 30/8/19 includes Curl Curl North School and P&C members. Letterbox drops confirmed in Minutes as having occurred on 12/8/19	C
<b>Incident Notification, Reporting and Response</b>				
C37	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a>	Interview with auditees 19/09/19	The Project advised that no notifiable incident occurred during the reporting period.	NT

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 1.			
<b>Non-Compliance Notification</b>				
C38	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. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Interview with auditees 19/09/19	Non-compliance with working hours due to concrete pour overrun on 3 July 2019 should have triggered a notification to DPIE under this requirement but this did not occur	NC
<b>Vehicular Crossing</b>				
C39	An Authorised Vehicle Crossing Contractor must construct the vehicle crossing and associated works within the road reserve in plain concrete. All redundant laybacks and crossings are to be restored to footpath/grass. Prior to the pouring of concrete, the vehicle crossing is to be inspected by Council and a satisfactory "Vehicle Crossing Inspection" card issued.	13-2-19, Construction Traffic and Pedestrian Management Plan, Craig Reeves, Sydney Traffic Control. Site inspection 19/09/19	Road works had not commenced.	NT
<b>Stormwater Drainage</b>				
C40	All stormwater drainage pipelines connecting to the nearest Council drainage system must be constructed in accordance with AUSPEC specification for engineering works available at <a href="http://www.northernbeaches.nsw.gov.au">www.northernbeaches.nsw.gov.au</a> .	27-02-2019, Foran Industries, SWMS. Site inspection 19/09/19	Drainage connections had yet to commence	NT
C41	The Applicant must reconstruct all affected kerb and gutter, bitumen reinstatements, adjust all vehicular crossings for paths, grass verges and household stormwater connections to suit the kerb and gutter levels. Details demonstrating compliance must be submitted to the Certifying Authority	Site inspection 19/09/19	Kerb and gutter works had yet to commence.	NT
<b>Independent Environmental Audit</b>				
C42	No later than 3 months after the date notified for the commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.	29-08-2019, NSW Govt DPIE to NSW Dept Ed Statutory Planner, Agreement of	The Audit Program was not submitted within 3 months of commencement of construction.	NC

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
		<p>Independent Auditor Curl Curl North Public School.</p> <p>29-08-2019, NSW Govt Education to Planning Secretary, DPIE, Submission of Independent Audit Program.</p> <p>02-08-2019, NSW Govt Education to Planning Secretary, DPE, Nomination of WolfPeak as Independent Auditor.</p> <p>15-04-2019, NSW Govt Education School Infrastructure, Notification of Construction Commencement.</p>		
C43	<p>Independent Audits of the development must be carried out in accordance with:</p> <ul style="list-style-type: none"> <li>a) the Independent Audit Program submitted to the Department and the Certifying Authority under condition C42 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 has been undertaken in accordance with the Program and the IAPAR	C
C44	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must:</p> <ul style="list-style-type: none"> <li>a) review and respond to each Independent Audit Report prepared under condition C43 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 activity is undertaken following completion of this audit report	This activity is undertaken following completion of this audit report	NT

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C45	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.	Operations have not commenced	Operations have not commenced	NT
<b>Revision of Strategies, Plans and Programs</b>				
C46	<p>Within three months of:</p> <ul style="list-style-type: none"> <li>a) the submission of a compliance report under condition B43;</li> <li>b) the submission of an incident report under condition C37;</li> <li>c) the submission of an Independent Audit under condition C42; the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Department and the Certifying Authority must be notified in writing that a review is being carried out.</li> </ul>	This Audit Report	<p>The timing of this condition relates to during construction.</p> <p>This Audit Report represents the first trigger in the need to carry out a review of the strategies, plans and programs required under this consent must be reviewed, and the Department and the Certifying Authority must be notified in writing that a review is being carried out.</p> <p>For the avoidance of doubt we recommend the Department review the wording of this condition to make it clear whether or not the Pre-Construction Compliance is included within the triggered referred to in CoC C46a).</p>	NT
C47	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.</p> <p><b>Note:</b> <i>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></p>	Interview with auditees 19/04/19	At the time of the audit, no revision had been required.	NT



*PARTS D TO E NOT AUDITED AT THIS STAGE AS THESE ARE PRIOR TO OCCUPATION, COMMENCEMENT OF USE AND POST OCCUPATION REQUIREMENTS*

**Appendix B. Planning Secretary agreement of Independent Auditors**



Contact: Elizabeth Williamson  
Phone: 02 8289 6610  
Email: [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

NSW Department of Education  
Level 8, 259 George Street  
Sydney NSW 2000

Attention: David Lewis, Statutory Planner

EMAIL: [david.lewis83@det.nsw.edu.au](mailto:david.lewis83@det.nsw.edu.au)

Dear Mr Lewis,

**Agreement of Independent Auditor  
Curl Curl North Public School (SSD 8310)**

I refer to Andreas Winkelmeier's submission, dated 5 August 2019, seeking the agreement of the Secretary of the Department of Planning, Industry and Environment (the Department) of a suitability qualified, experienced and independent audit team to undertake independent audits of Curl Curl North Public School.

In accordance with Condition C42 of SSD 8310 (Consent) and the *Independent Audit Post Approvals Requirements* (Department 2018), the Secretary has agreed to the following audit team:

- Mr Derek Low; and
- Mr Steve Fermio.

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

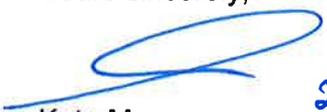
The Independent Audit must be prepared, undertaken and finalised in accordance with the *Independent Audit Post Approval Requirements* (Department 2018). Failure to meet these requirements will require revision and resubmission.

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 Elizabeth Williamson on the details listed above.

Yours sincerely,

  
Kate Moore  
**A/Principal Compliance Officer (Social Infrastructure)**  
*As nominee of the Secretary*

29/05/2019

**Appendix C. Consultation records**

## Steve Fermio

---

**From:** Elizabeth Williamson <Elizabeth.Williamson@planning.nsw.gov.au>  
**Sent:** Monday, 16 September 2019 12:53 PM  
**To:** Derek Low  
**Cc:** Kate Moore (DPE)  
**Subject:** RE: Independent Audit of Curl Curl North Public School (SSD 8310)

Good afternoon Derek,

Thank you for sending the below email and for returning my call this morning. Please ensure that the audit is conducted in accordance with Condition C43 of Development Consent SSD 8310 (Consent), which requires the audit to be carried out in accordance with the Independent Audit Post Approval Requirements (PARs).

In addition to the above, can you please focus on assessing compliance with Conditions B1 and B6-B14 which relate to parking and contamination.

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

Kind regards,

**Elizabeth Williamson**  
**Senior Compliance Officer**

Planning & Assessment | Department of Planning, Industry and Environment  
T 02 8289 6610 | M 0447 041 325 | E [elizabeth.williamson@planning.nsw.gov.au](mailto:elizabeth.williamson@planning.nsw.gov.au)  
Level 30, 320 Pitt Street, Sydney NSW 2001  
Please direct all email correspondence to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)  
[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



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

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**From:** Derek Low <[dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au)>  
**Sent:** Monday, 9 September 2019 2:38 PM  
**To:** DPE PSVC Compliance Mailbox <[compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)>  
**Subject:** Independent Audit of Curl Curl North Public School (SSD 8310)

Hi there.

I am one of the DPE approved Independent Auditors on the Curl Curl North Public School Redevelopment (SSD 8310).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8310 Condition C43 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/04543882a494bd6081bdc4c789df39d6/SSD%208310 %20 Signed%20Instrument%20and%20conditions.pdf](https://majorprojects.accelo.com/public/04543882a494bd6081bdc4c789df39d6/SSD%208310%20Signed%20Instrument%20and%20conditions.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 16 September 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 Department on the scope of the audit.

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 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



*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

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



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**♻️ Consider the environment. Please don't print this e-mail unless really necessary.**

## Steve Fermio

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**From:** Anna Timbrell <Anna.Timbrell@epa.nsw.gov.au>  
**Sent:** Thursday, 19 September 2019 3:57 PM  
**To:** Derek Low  
**Cc:** Sarah Thomson  
**Subject:** Independent Audit of Curl Curl North Public School (SSD 8310)

Hi Derek

I refer to your email to the EPA dated 09.09.19 regarding the above.

The EPA is not aware of any particular issues regarding the school.

One complaint was received on 24 June 2019 from the Northern Beaches Council regarding sediment laden water.

I hope is of some assistance.

Kind regards

### **Anna Timbrell**

**Environmental Planning Officer – Metropolitan Infrastructure**

Metropolitan Branch, NSW Environment Protection Authority

Ph: 02 9274 6345

[anna.timbrell@epa.nsw.gov.au](mailto:anna.timbrell@epa.nsw.gov.au) [www.epa.nsw.gov.au](http://www.epa.nsw.gov.au) ☐@EPA NSW

**Report pollution and environmental incidents 131 555 (NSW only) or +61 2 9995 5555**

**Please send all official correspondence to [metropolitan.transport@epa.nsw.gov.au](mailto:metropolitan.transport@epa.nsw.gov.au)**



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Hi there.

I am one of the DPE approved Independent Auditors on the Curl Curl North Public School Redevelopment (SSD 8310).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8310 Condition C43 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/04543882a494bd6081bdc4c789df39d6/SSD%208310 %20Signed%20Instrument%20and%20conditions.pdf](https://majorprojects.accelo.com/public/04543882a494bd6081bdc4c789df39d6/SSD%208310%20Signed%20Instrument%20and%20conditions.pdf)

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

[/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf](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 19 September 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



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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 Environment Protection Authority.

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

# Independent Audit Declaration Form

## Independent Audit Declaration Form

Project name	Curl Curl North Public School Redevelopment
Consent Number	SSD 8310
Description of Project	Redevelopment and operation of the Curl Curl Public School including demolition, remediation, earthworks, construction of single and two story buildings, upgrades to existing buildings and COLA and ancillary parking, access, playing areas and utility works.
Project Address	Corner of Playfair Road and Abbot Road Curl Curl 2096
Proponent	NSW Department of Education (Infrastructure Projects)
Title of Audit	Independent Audit
Date	02/08/19

I declare that:

- 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
  - it is my understanding that I may be engaged to also prepare the independent audit program;
- 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:

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

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

# Independent Audit Declaration Form

## Independent Audit Declaration Form

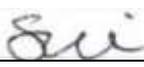
Project name	Curl Curl North Public School Redevelopment
Consent Number	SSD 8310
Description of Project	Redevelopment and operation of the Curl Curl Public School including demolition, remediation, earthworks, construction of single and two story buildings, upgrades to existing buildings and COLA and ancillary parking, access, playing areas and utility works.
Project Address	Corner of Playfair Road and Abbot Road Curl Curl 2096
Proponent	NSW Department of Education (Infrastructure Projects)
Title of Audit	Independent Audit
Date	02/08/19

I declare that:

- 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
  - it is my understanding that I may be engaged to also prepare the independent audit program;
- 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.

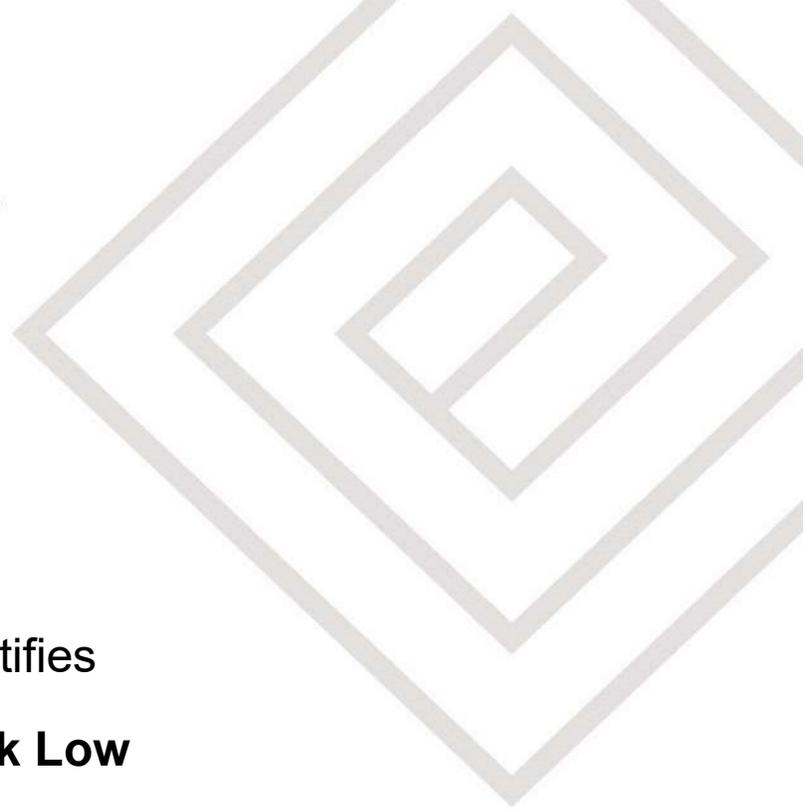
Notes:

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

Name of auditor	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



**Exemplar**  
Global  
Certification



**Certifies**

**Derek Low**

has satisfied all of the requirements for the grade of

**Principal Auditor**

in the Qualification Based

**Environmental Management Systems Auditor \***

with the following Scope of Certification

01. Environmental Management Audit

05. Environmental Regulatory Compliance Audit

114283  
Certificate Number

08 Apr 2019  
Certificate Date

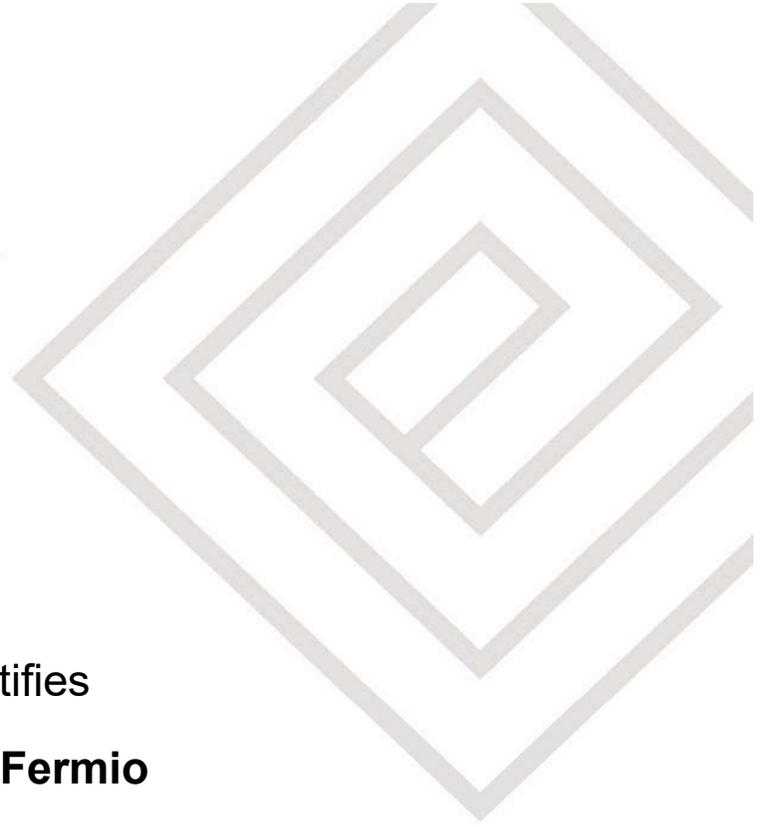
26 Oct 2019  
Expires

President and CEO  
Andrew Baines

\* certified individual has successfully transitioned to ISO 14001:2015



**Exemplar**  
Global  
Certification



Certifies

**Steve Fermio**

has satisfied all of the requirements for the grade of

**Principal Auditor**

in the Qualification Based

**Environmental Management Systems Auditor**

with the following Scope of Certification

01. Environmental Management Audit  
02. ISO14001:2015 Audit

04. Environmental Report Verification  
05. Environmental Regulatory Compliance Audit

110498  
Certificate Number

15 Apr 2019  
Certificate Date

15 Apr 2020  
Expires

President and CEO  
Andrew Baines



**Appendix E. Site inspection photographs.**



Plate 1A – Site entrance sliding gate with high pressure hose for vehicle wash down

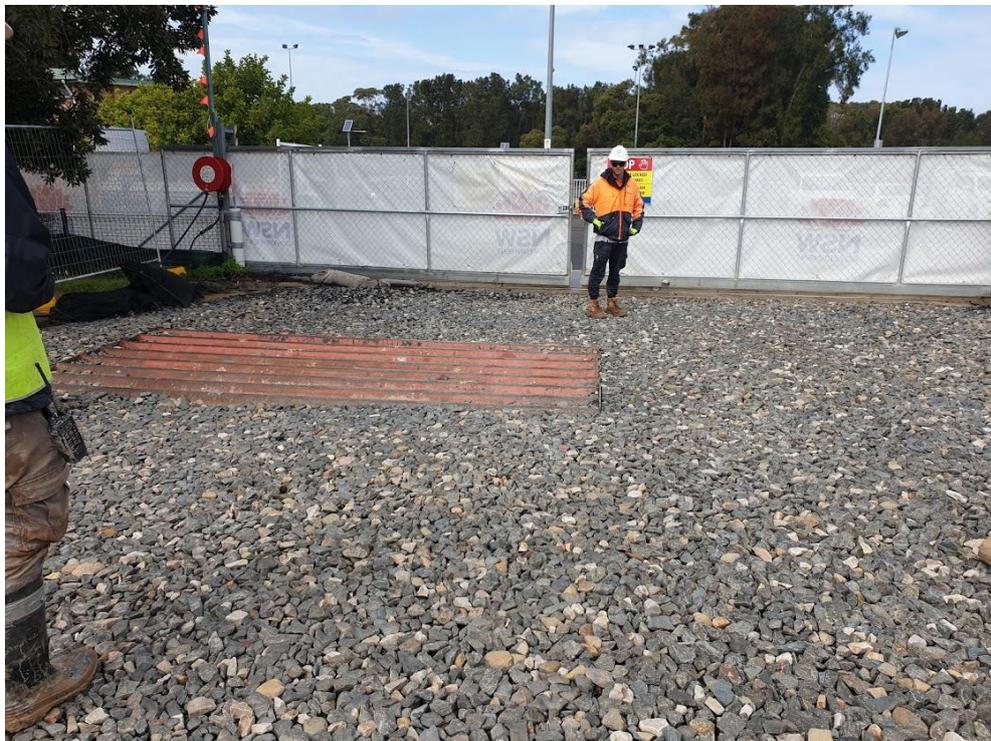
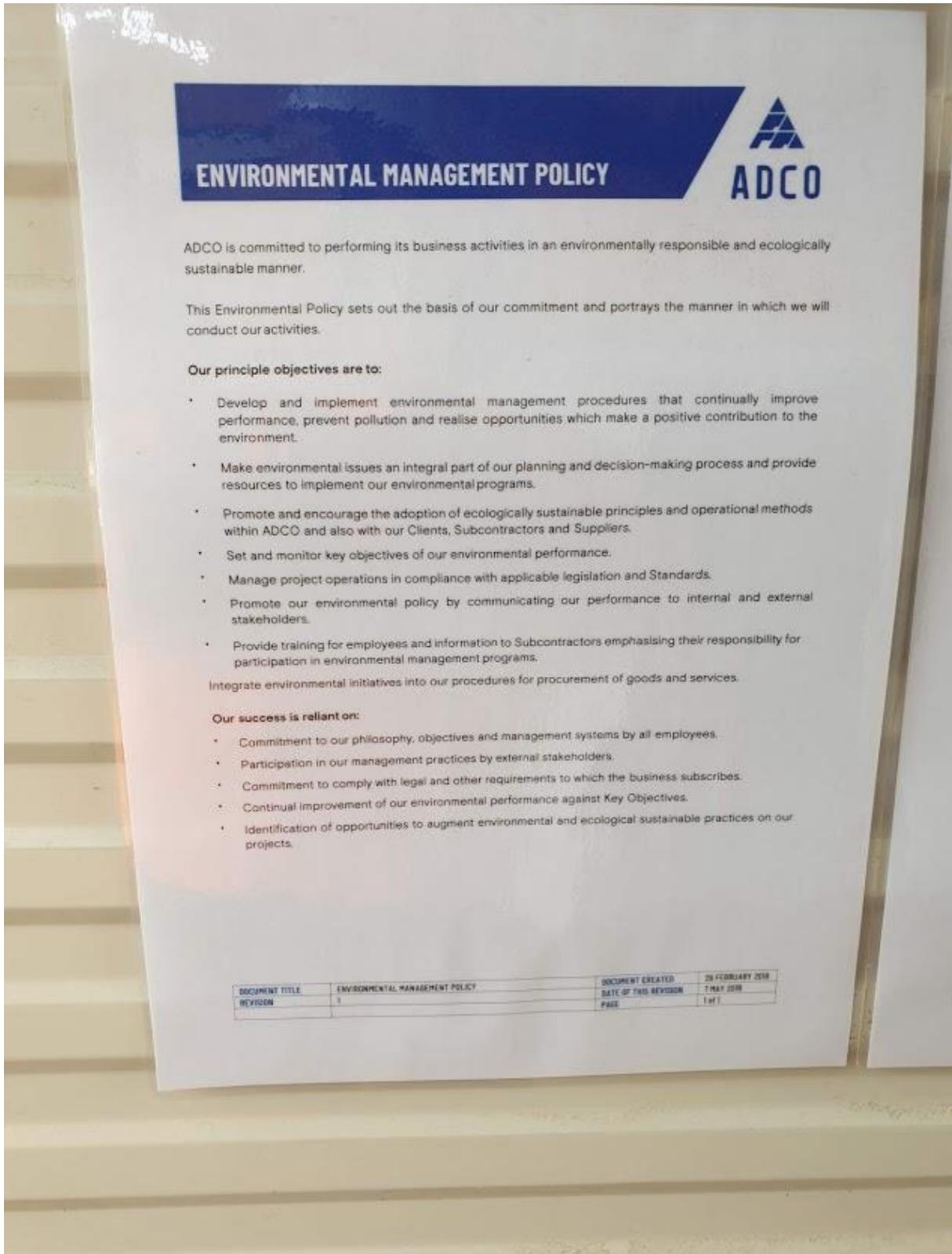


Plate 1B – Site entrance with cattle grid and stabilized access



Plate 2 – Tree protection zone



## ENVIRONMENTAL MANAGEMENT POLICY



ADCO is committed to performing its business activities in an environmentally responsible and ecologically sustainable manner.

This Environmental Policy sets out the basis of our commitment and portrays the manner in which we will conduct our activities.

### Our principle objectives are to:

- Develop and implement environmental management procedures that continually improve performance, prevent pollution and realise opportunities which make a positive contribution to the environment.
- Make environmental issues an integral part of our planning and decision-making process and provide resources to implement our environmental programs.
- Promote and encourage the adoption of ecologically sustainable principles and operational methods within ADCO and also with our Clients, Subcontractors and Suppliers.
- Set and monitor key objectives of our environmental performance.
- Manage project operations in compliance with applicable legislation and Standards.
- Promote our environmental policy by communicating our performance to internal and external stakeholders.
- Provide training for employees and information to Subcontractors emphasising their responsibility for participation in environmental management programs.

Integrate environmental initiatives into our procedures for procurement of goods and services.

### Our success is reliant on:

- Commitment to our philosophy, objectives and management systems by all employees.
- Participation in our management practices by external stakeholders.
- Commitment to comply with legal and other requirements to which the business subscribes.
- Continual improvement of our environmental performance against Key Objectives.
- Identification of opportunities to augment environmental and ecological sustainable practices on our projects.

DOCUMENT TITLE	ENVIRONMENTAL MANAGEMENT POLICY	DOCUMENT CREATED	26 FEBRUARY 2018
REVISION	1	DATE OF THIS REVISION	7 MAY 2018
		PAGE	1 of 1

Plate 3 – Environment Policy on display at site office



Plate 4 – Site Notice Plan

<p><b>Freedom of Association</b></p> <p><b>Right of Entry</b></p> <p><i>Construction Compliance Unit</i></p> <p><b>NEW!</b> The new state of business</p>	<p><b>Safer by Choice means:</b></p> <ul style="list-style-type: none"> <li>Taking responsibility</li> <li>Improving each other</li> <li>Focusing on positives</li> </ul> <p>Our decisions impact safety. Be Safer by Choice, not Safer by Chance.</p>	<p><b>ADCO SITE SPECIFIC RULES</b></p> <ol style="list-style-type: none"> <li>SITE HOURS: MONDAY - FRIDAY, 7AM - 5PM SATURDAY, 7AM - 3PM</li> <li>MANDATORY PPE/CLOTHING REQUIRED</li> </ol> <div style="display: flex; justify-content: space-around; align-items: center;"> </div> <ol style="list-style-type: none"> <li>NO PARKING ON SITE</li> <li>NO SMOKING, ALCOHOL OR DRUGS ON SITE - NO EXCEPTIONS</li> <li>NO DELIVERIES BETWEEN 8:30 - 9:30 AND 2:30 - 3:30PM 24 HOURS NOTICE REQUIRED FOR ALL DELIVERIES</li> <li>DAILY PRE-START IS AT 6:55AM</li> <li>ALL WORKERS TO BE INDUCTED PRIOR TO STARTING WORK. INDUCTIONS CONDUCTED AT 7AM DAILY - NO EXCEPTIONS</li> <li>APPROVED SWMS PRIOR TO ANY WORK</li> <li>DAILY SIGN-IN REGISTER FOR ALL WORKERS AND VISITORS</li> <li>NO FOUL LANGUAGE, BULLYING OR FIGHTING ON SITE</li> <li>NO INTERACTION WITH SCHOOL STUDENTS OR STAFF</li> <li>PERMIT REQUIRED FOR HIGH RISK WORKS</li> <li>ELECTRICAL TAGGING OF EQUIPMENT EVERY 3 MONTHS</li> <li>PLATFORM LADDERS ONLY</li> <li>ALL VISITORS TO REPORT TO SITE OFFICE UPON ARRIVAL</li> <li>ALL PLANT MUST BE REGISTERED AND EVIDENCE OF LICENSE/COMPETENCY OF USER PROVIDED PRIOR TO OPERATION</li> <li>NO UNAUTHORISED STORAGE OF HAZARDOUS SUBSTANCES</li> <li>ALTERATIONS TO SCAFFOLD BY SCAFFOLDERS ONLY</li> </ol>
<p><b>LOCAL &amp; EMERGENCY CONTACTS</b></p> <p><b>EMERGENCY SERVICES</b> 000</p> <p><b>LOCAL &amp; EMERGENCY CONTACTS</b> <b>MEDICAL CENTRE</b> (02) 9982 3533</p> <p><b>NORTHERN BEACHES HOSPITAL</b> (02) 9105 5000</p> <p><b>LOCAL POLICE STATION</b> (02) 9971 3399</p>	<p><b>TOP FIVE RISKS</b></p> <p><i>ASTRAS BLOCK A WALL CLEANING HEIGHTS MOVING PLANT</i></p>	<p><b>ADCO</b> PEOPLE WHO BUILD</p>
<p><b>ADCO</b> BUILDER OF CHOICE</p>	<p><b>KEY ADCO CONTACTS</b></p> <p>DAVID LOCK PROJECT MANAGER 0448 988 448</p> <p>BRIAN TAYLOR SITE MANAGER 0417 460 433</p> <p>ANTONY PETKOVIC SAFETY ADVISER/FIRST AIDER 0459 787 935</p>	<p><b>SAFETY PULSE WALK</b></p> <p>PRETILE TO MP/ROW</p> <p><i>SAFETY PULSE WALK</i></p> <p><b>THIS WEEK'S FOCUS</b></p> <p><i>HOUSE STEERING</i></p>
<p><b>TODAY'S WEATHER</b></p> <p>DATE: <i>19/19/19</i></p> <p>MOON: <i>20</i></p> <p>BY 10:00: <i>MAIN 63 3mm</i></p> <p>WEATHER CONDITIONS: <i>PARTLY CLOUDY BECOMING WINDY</i></p>	<p><b>GENERAL NOTES</b></p> <p><i>NO SWEARING ON SITE *</i></p>	<p><b>UNEXPECTED FIND PROTOCOL</b></p>
<p><b>ADCO POLICIES &amp; STANDARD PROCEDURES</b></p>	<p><b>SAFER BY CHOICE</b></p>	<p><b>HAMMERTech</b></p>
		<p><b>VISITORS SIGN IN AT SITE OFFICE</b></p>

Plate 5 – Site Notice Plan continued

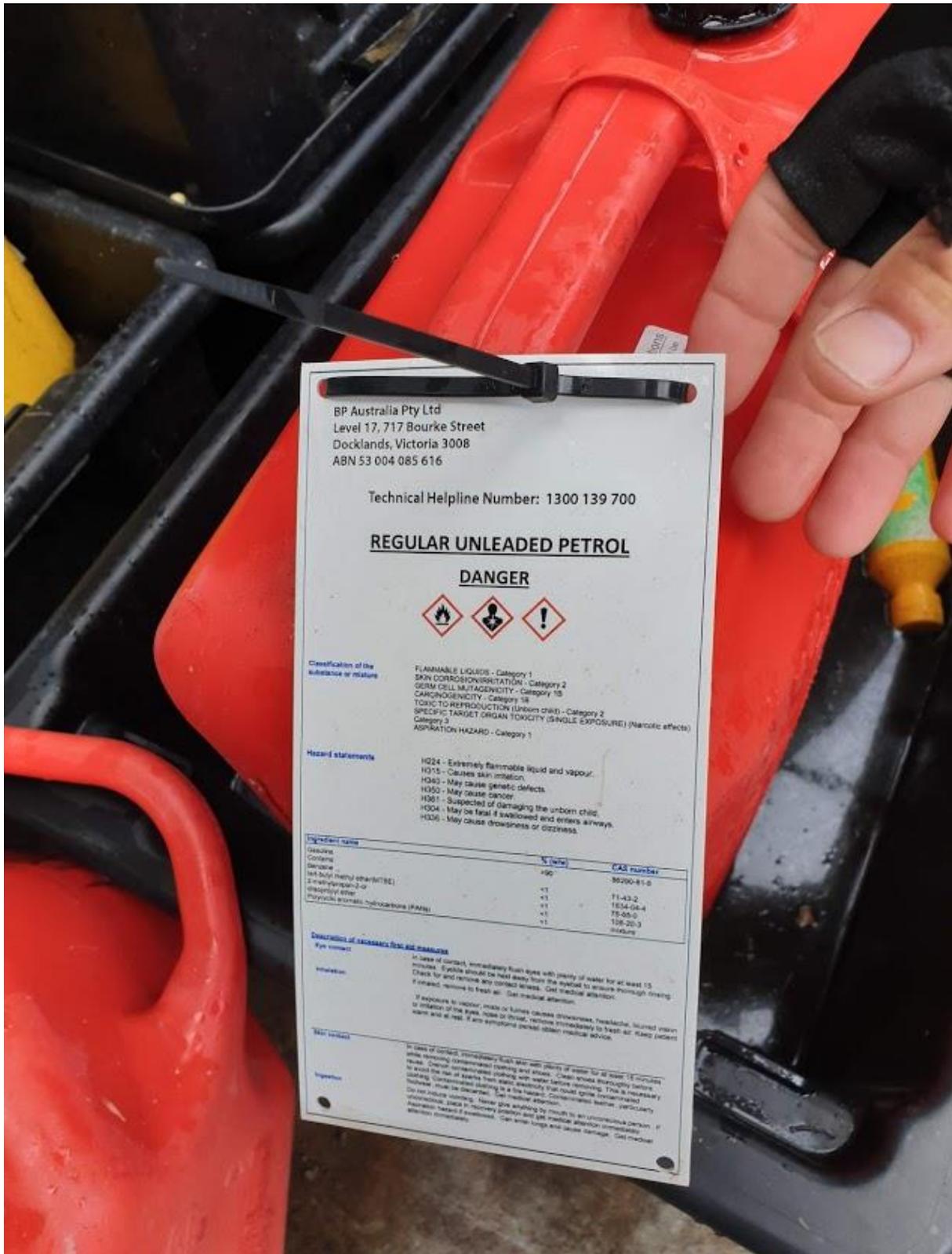


Plate 6 – Fuel containers with MSDS information directly attached



Plate 7 – Acoustic blanket placed over site hoarding



Plate 8 – Secure fuel and chemical store



Plate 9 – Noise mitigation signage at edge of worksite overlooking High School recreational space



Plate 10 – Silt fence in drainage line following heavy rain event (maintenance planned once site dries out)



Plate 11 – Signage on site exterior with contact details



Plate 12 – Site Notice on exterior of site



Plate 13 – Silt fence in lowest corner of site

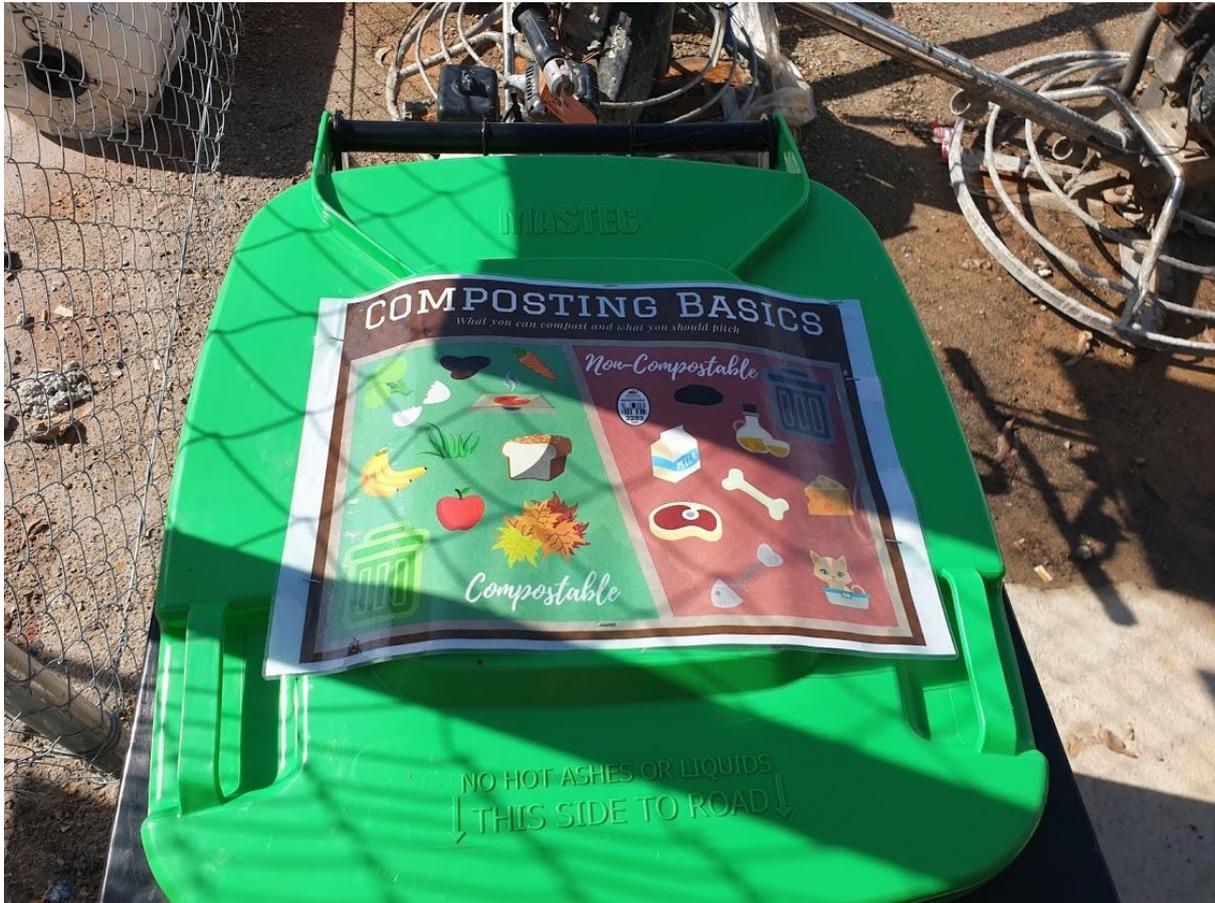


Plate 14 – Composting bin

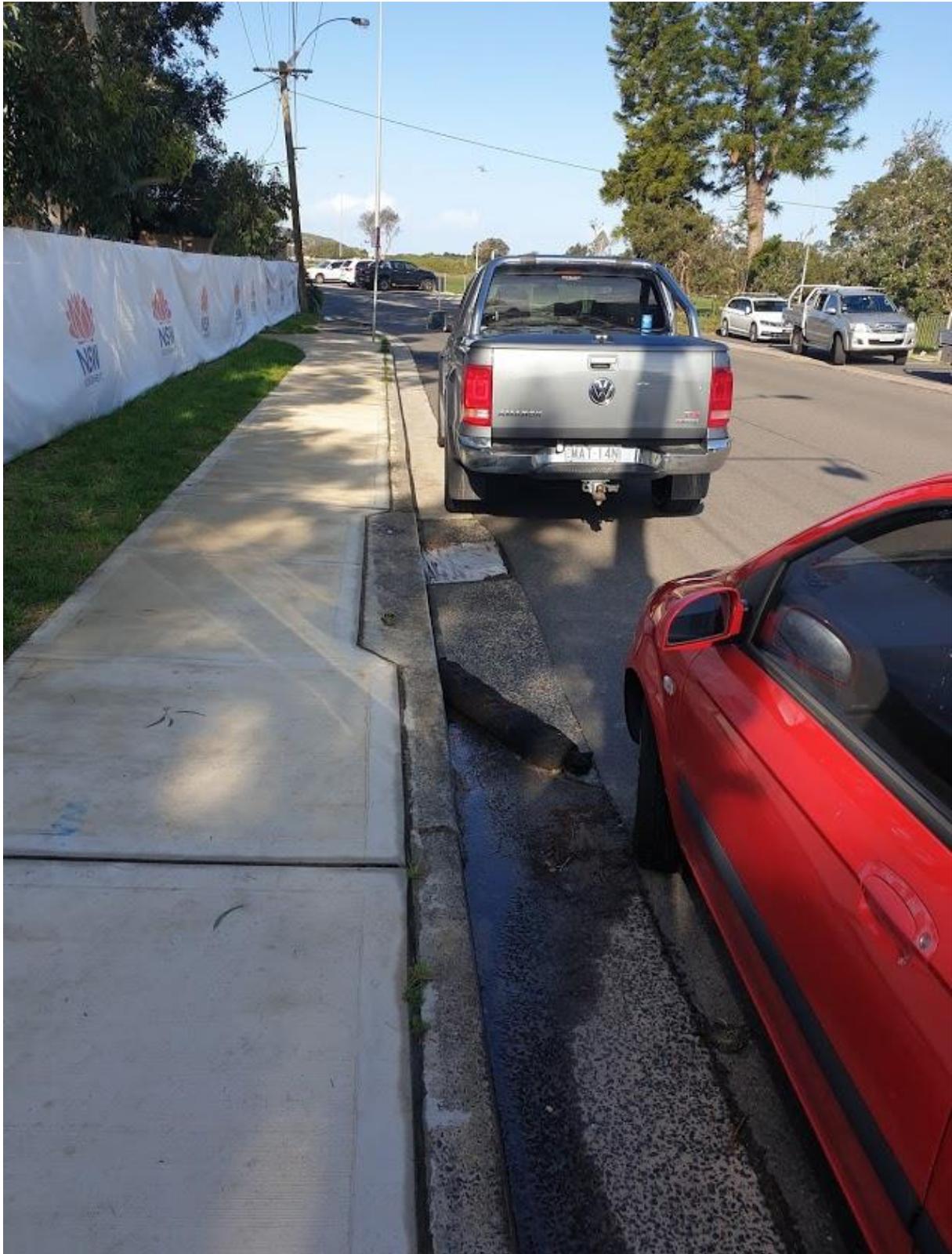


Plate 15 – Sediment socks and geofabric covered inlet in stormwater drainage system outside site



Plate 16 – Concrete washout tray



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