

Independent Audit 4 - Operation

***State Significant Development (SSD 23330227)
Upgrades to John Palmer Public School***

06 May 2024

Independent Environmental Audit 3

State Significant Development (SSD 23330227) Upgrades to John Palmer Public School

06 May 2024



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Acronyms and Abbreviations

Acronym	Definition
BMSP	Biodiversity Management Sub-Plan
BCC	Blacktown City Council
DPHI	Department of Planning, Housing and Infrastructure (formerly Department of Planning and Environment (DPE))
EIS	Environmental Impact Statement
EMP	Environmental management plan
EMS	Environmental Management System
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
IAPAR	Independent Audit Post Approval Requirements (DPIE, May 2020)
LMP	Landscape Management Plan
OFEMP	Operational Flood Emergency Management Plan
OHEMP	Out of Hours Event Management Plan OHEMP
OWMP	Operational Waste Managing Plan
PMP	Project Management Plan (RCC)
PPE	Personal Protective Equipment
PTS	Permanent teaching spaces
RCC	Richard Crookes Constructions
RtS	Response to Submissions
SINSW	School Infrastructure New South Wales
SSD	State Significant Development
STP	School Transport Plan \
TfNSW	Transport for NSW
TPZ	Tree protection zone
TTS	Temporary teaching spaces

Executive Summary

Development consent for State Significant Development (SSD) 23330227 (20 May 2022) requires that independent audits of the development be carried out in accordance with conditions of consent (conditions) C34 to C39.

This independent audit report satisfies these conditions, and has been audit has been conducted in accordance with:

- *Independent Audit Post Approval Requirements (IAPAR)* (DPIE, May 2020)
- The processes and practice procedures identified in AS/NZS ISO 19011:2014 - *Guidelines for Auditing Management Systems*.

This audit report documents the findings and outcomes of the review of compliance against the conditions of consent (CoC) of SSD 23330227, conducted by Arcadis (Lead Auditor – Denise Day). Consultation with the Department of Planning, Housing and Infrastructure (DPHI) (formerly Department of Planning and Environment) and Blacktown City Council (BCC). The audit process comprised a detailed document review, opening and closing meetings, site visit (conducted on the 17 pril 2024) and post-site audit document review and follow up.

Of the 173 conditions under SSD 23330227 the audit identified the following:

- Compliant: 49
- Non-compliant: 19
- Not triggered: 105

A summary of the non-compliances is as follows:

1. Non-compliances considered to impact project performance:
 - Three non-compliances relate to way-finding and signage not having been installed at the time of the audit (D21, D29, D30).
 - One non-compliance relating to the installation of landscaping in accordance with the approved plan (D32).
 - Obstruction of car parking spaces resulted in a non-compliance against E10.
2. Non-compliances considered 'administrative' in nature:
 - Ten non-compliances (against A11, A12, D5, D6, D20, D21, D28, D31, D33 and D34) resulted from ineffective implementation of the approved Staging Report. Four of the non-compliances had been closed out, that is, documentation submitted to the Certifier, at the time of the audit. Recommendations are presented to close the remaining.
 - Two non-compliances relate to notifications under conditions B4 and D1 of the commencement of operation.
 - Failure to implement two of the improvement opportunities raised in Audit 3 have resulted in non-compliances against conditions B4 and D34 in this audit.
 - Noise monitoring was not conducted for each stage (E9).

Thirteen recommendations have been proposed to rectify existing non-compliances or prevent future potential non-compliances. Three improvement opportunities were identified.

1 Introduction

1.1 Project Background

The proposed upgrades at the new John Palmer Public School (JPPS) include the formalisation of learning spaces in a new three storey building that will replace twenty existing demountable classrooms on site and provide an additional eight teaching spaces. The upgrade will increase capacity from 917 students to 1,012 students. It will also include the addition of a new library building and refurbishment of existing spaces and hall extension.

The current permanent teaching spaces on site is 24, the project will increase this to 44 permanent teaching spaces.

Delivery of the project will included:

- Replacing 20 existing temporary teaching spaces (TTS) with 28 permanent spaces and provide an additional eight new permanent teaching spaces (PTS), expanding the total PTS at John Palmer PS to 44 Homebases
- Remove 20 demountables
- Functionally upgrade to future focused 16 existing teaching spaces
- Convert staff facilities in building A to administration facilities
- Convert library facilities in building D to staff facilities and program rooms
- Construct a new library within the new buildings
- Conserve open space at the rear of the school.

Development Application State Significant Development (SSD) 23330227 was approved under Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) on the 20 May 2022.

The project was constructed by Richard Crookes Constructions (RCC). Construction of the project started on 11 July 2022. The commencement of operation is being staggered across seven stages to enable the school to progressively commence operating the new and upgraded facilities as they are completed. Stages 1 to 6 were operational at the time of the audit. Further information regarding staging of operation is provided in Section 3.1.

1.1.1 Project Location

The project is located within the grounds of John Palmer Public School at 85 The Ponds Boulevard, The Ponds, NSW 2769, Lot 1 in Deposited Plan 1131340, as shown in Figure 1.

The site is owned by the Department of Education. The school was constructed by a PPP consortium Axiom Education No. 2 Pty Ltd which provides ongoing cleaning, maintenance and security services.



Figure 1: Project plan

1.1.2 Project Staging

The project construction was not delivered in stages.

As JPPS is an operational school, the commencement of operation occurred across seven stages to enable the school to progressively commence operating the new and upgraded facilities as they reach completion. As defined in the Staging Report these stages are:

Stage 1 included the minor refurbishment works within Block F, converting the Homebase to a Special Education Support Unit. The date of commencement of operation was the 17 July 2023.

Stage 2 consisted of the refurbishment and extension of Block BH - Hall and Block BL, a new Library. The date of commencement of operation was the 6 October 2023.

Stage 3 involved the refurbishment and extension to the Block A (Admin) – Staff room refurbishment/extension and hydrant pump room. The date of commencement of operation was the 6 October 2023.

Stage 4 comprised new three (3) storey building Block N, which houses homebases, practical activity areas and amenities. The date of commencement of operation was the 27 October 2023.

Stage 5 involved refurbishment of Block D existing library that will be converted into additional homebases. The date of commencement of operation was the 27 November 2023.

Stage 6 included internal landscaping and external works within the site following the decanting of temporary classrooms and builders' amenities. The date of commencement of operation was the 30 January 2024.

Stage 7 involved the public domain works outside the school boundary. Stage 7 is anticipated to be handed over by the 30 July 2024, pending receipt of relevant approvals from Blacktown City Council.

The current status of the development against these stages is provided in Section 3.1.



The Independent Audit requirements are detailed in conditions of consent C34 to C39 of SSD 23330227 as presented in Table 1.

The initial operation audit was conducted on the 17 April 2024.

Table 1: SSD 23330227 conditions of consent relating to Independent Environmental Audits

Condition	Requirement
C34	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.
C35	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.
C36	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those agreed to above, upon giving at least 4 weeks' notice to the Applicant of the date or timing upon which the audit must be commenced.
C37	In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must: <ul style="list-style-type: none"> (a) review and respond to each Independent Audit Report prepared under condition C35 of this consent, or condition C36 where notice is given; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary.
C38	Independent Audit Reports and the applicant/proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements unless otherwise agreed by the Planning Secretary.
C39	Notwithstanding the requirements of the Independent Audit Post Approval Requirements, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.

1.2 Audit Team

Denise Day – Lead Auditor

Qualifications

- Bachelor of Science (Honours), Post Graduate Diploma in Environmental Impact Assessment
- Environmental Auditor (Exemplar Global Certificate No: 14760). Scopes:
 - Environmental Management Audit

Denise has 22 years audit experience conducting audits across a diversity of sectors with varying focus and scope, including environmental management systems, environmental performance, compliance/ regulatory, governance, and sustainability audits and due diligence assessments.

1.3 Audit Objectives

The objectives of this independent audit were to assess:

- Compliance with the SSD 23330227 conditions of consent and to identify recommendations for each non-compliance raised

- Implementation of site management plans
- The environmental performance of the development
- The appropriateness and effectiveness of the project's environmental management systems (EMS)
- The adequacy of site management plans and identify opportunities for improvement.

1.4 Audit Scope

The scope of this Independent Audit includes:

1. An assessment of compliance with:
 - a. All conditions of consent applicable to the phase of the development that is being audited
 - b. All post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of the management plans
 - c. All environmental licences and approvals applicable to the development excluding environment protection licences issued under the *Protection of the Environment Operations Act 1997*.
2. A review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - a. Actual impacts compared to predicted impacts documented in the environmental impact assessment (EIS)
 - b. The physical extent of the development in comparison with the approved boundary
 - c. Incidents, non-compliances and complaints that occurred or were made during the audit period
 - d. The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - e. Feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period.
3. The status of implementation of previous Independent Audit findings, recommendations and actions (Note: This requirement is not applicable as this is the first audit for the project)
4. A high-level review of the project EMS, including assessment of third-party certification, the type, nature and scope of the systems having regard to the nature and scale of the development, the implementation of the systems, and any key deficiencies identified
5. A high-level assessment of whether management plans are adequate
6. Any other matters considered relevant, taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

1.5 Audit Period

This first operation IEA covers the period from the date of the third site audit on the 21 September 2023 to the date of the fourth site audit on the 17 April 2024.

2 Audit Methodology

This independent audit was conducted in accordance with the audit methodology and audit report requirements detailed in *Independent Audit Post Approval Requirements* (IAPAR) (DPIE, May 2020). As relevant, the audit methodology will also meet the requirements of AS/NZS ISO 19011:2019 *Guidelines for auditing management systems*.

2.1 Selection and Endorsement of the Audit Team

Endorsement of the independent audit team was provided to SINSW from the Planning Secretary Department of Planning and Environment (DPE) on 15 June 2022. The letter of approval is provided in Appendix A.

2.2 Independent Audit Scope Development

IAPAR (DPIE, May 2020) sets out the minimum requirements to be met when undertaking independent audits for SSD approvals and are detailed in Section 1.4.

2.2.1 Consultation

Further development of the scope of the audit was considered through agency consultation, and review of the Response to Submissions (RtS).

Consultation was also undertaken with DPE, Blacktown City Council (BCC) and Transport for NSW (TfNSW) to obtain input into the scope of the audit. Evidence of consultation is provided in Appendix B. A summary of consultation is presented below.

Table 2: Summary of consultation

Agency	Contact(s)	Date(s)	Comments provided and response in parenthesis ()
AUDIT 4			
DPE	DPE PSVC Compliance Mailbox	04/03/2024 (issued)	<ul style="list-style-type: none">The Department does not require any additional issues for inclusion within the scope of the Audit that are not already captured by the Consent, and the Department's Independent Audit Post Approval Requirements (May 2020).
	Damien Smith	16/04/2024 (response)	
AUDIT 3			
DPE	DPE PSVC Compliance Mailbox	21/08/2023 (issued)	<ul style="list-style-type: none">The previous audit also identified numerous non-compliances, can you please review the close out actions from the Response to the IEA non-compliances to determine if these matter have been appropriately addressed.
	Damien Smith	12/09/2023 (response)	
BCC	Judith Portelli	21/08/2023 (issued)	<ul style="list-style-type: none">No response provided.
AUDIT 2			

Agency	Contact(s)	Date(s)	Comments provided and response in parenthesis ()
DPE	DPE PSVC Compliance Mailbox Alfarid Hussain	23/01/2023 (issued) 13/03/2023 (response)	<ul style="list-style-type: none"> Consult with Blacktown City Council and Transport for NSW (see below and Appendix B) Provide details of all non-compliances in the reporting period of the upcoming audit in the audit report regardless of whether they have been resolved through corrective actions (refer to Section 3.3 and Appendix E) Include School Infrastructure NSW in all communication relating to the upcoming independent environmental audit including any non-compliances identified on site, during interviews or from review of documents and correspondence (all correspondence issued to Wil Nino (updated to Amit Rampal for Audit 3), SINSW Project Director. Available on request) Provide a status update on where construction of the site is at and any significant upcoming activities in the next reporting period (refer to Section 3.1) Report on any outstanding item from the previous reporting period (refer to Section 3.6). <p>Note that the requirements of conditions of SSD 23330227 (Approval) overrides any inconsistencies in any documents and correspondences issued under the Approval to the extent of that inconsistency. (No inconsistencies identified).</p>
BCC	Judith Portelli	09/03/2023 (issued)	No response provided.
TfNSW	Development Sydney Felix Liu (Land Use Planner, TfNSW)	09/03/2023 (issued) 21/03/2023 (response)	Transport for NSW raises no further comments to the Second independent Audit, as the development has minor impact on classified road network.
AUDIT 1			
DPE	Alfarid Hussain	3 August 2022	<p>Requested consultation with TfNSW and BCC.</p> <p><i>The Department has provided comments on the Construction Environmental Management Plan and associated sub-plans. Can you please undertake a review of the adequacy of those plans and whether they are being implemented on-site. Any improvement opportunities must be reported in the IEA Report.</i></p>
BCC	Judith Portelli	16 August 2022	No comments provided.
TfNSW	David Rohloff	16 August 2022	No comments provided.

2.3 Audit Process

2.3.1 Opening Meeting

An opening meeting was conducted on the 17 April 2024 with the purpose of discussing:

- The audit purpose, objectives and scope
- The resources required
- Methodology to be applied in conducting the audit
- Overview of the project and current status of the works
- Site safety requirements, including induction and Personal Protective Equipment (PPE).

A copy of the meeting agenda and register of attendees (including their name and position title) for the opening meeting is presented in Appendix C.

2.3.2 Site Interviews

Site personnel and their position title interviewed for this audit are in Table 3. Interviews were conducted during the site visit on the 17 April 2024.

Table 3: Personnel interviewed

Name	Position	Company
Joe Hanna	Project Engineer	RCC
Vipul Patel	SPM	Jacobs
Pedro Franchi		Jacobs

The interviews covered the following information:

- The status of the implementation and maintenance of landscaping around the site
- A summary of the outstanding construction and landscaping defects
- The status and requirements for the Stage 7 works
- Discussion on meeting the requirements of conditions in conformance with the approved Staging Report.

2.3.3 Site Inspection

The site inspection was undertaken on the 17 April 2024 by Denise Day (Lead Auditor).

All areas visited during the site inspection included:

- The external perimeter of the site – Pebble Crescent
- All areas within the construction boundary.

Photographs taken during the site inspections are presented in Appendix D.

2.3.4 Closing Meeting

The closing meeting was conducted on the 17 April 2024 with the purpose of:

- Presenting preliminary audit findings
- Discussing recommendations
- Confirming any post-audit actions, including requests for further documentation.

A copy of the meeting agenda and register of attendees (including their name and position title) for the closing meeting is presented in Appendix C.

2.4 Compliance status descriptors

Evidence collated through documentation and during the site inspection and interviews was evaluated to assess compliance with the relevant conditions of consent. Any information gaps identified were addressed through requests for further data, or additional interviews.

The evidence used to verify the compliance status descriptor chosen with respect to each condition of consent is documented in the Audit Table (Appendix E).

The compliance status descriptors and definitions that have been applied to assess compliance requirements in the Audit Table are presented in Table 4.

Conditions addressed in previous construction audits were identified as 'Not triggered' for this initial operation audit.

Table 4: Compliance status descriptors

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

When evaluating post-approval documents, the following was assessed:

- Have they have been developed in accordance with the conditions of consent and approvals applicable to the development, and is the content adequate
- Have they have been implemented in accordance with the conditions of consent for the development.

The adequacy of documents was determined based on whether:

- There are any non-compliances resulting from the implementation of the document
- Whether there are any opportunities for improvement.

3 Audit Findings

3.1 Project Status as at Audit 4

At the time of the first operation audit held on 17 April 2024, the status of the project was as follows:

- Stage 1 - Block F refurbishment works: commencement of operation 17 July 2023.
- Stage 2 - Block B Hall and Library refurbishment and extension: commencement of operation 6 October 2023.
- Stage 3 - Block A Admin (staff room) refurbishment and extension: commencement of operation 6 October 2023.
- Stage 4 - Block N New Building: commencement of operation 27 October 2023.
- Stage 5 - Block D refurbishment: commencement of operation 29 November 2023.
- Stage 6 - Landscaping and External Works: commencement of operation 30 January 2024.
- Stage 7 - Public Domain. Public Domain. Anticipated 30 July 2024.

Refer to Appendix D for photographs indicating the stage of construction at the time of the site audit.

3.2 Approval and Document List

A Request for Information (RFI) Register was prepared based on a review of the SSD 23330227 conditions of consent was issued to RCC on the 27 February 2023. The key documents reviewed for the audit, and the relevant approval documents, are provided in Table 5.

Table 5: Relevant documents

Document name	Author, Date
Environmental Impact Statement (EIS) John Palmer Public School	Architectus (Rev B, 13/10/2021)
Response to Submissions (RTS) John Palmer Public School	Architectus (Rev B, 14/01/2022)
John Palmer Public School Biodiversity Development Assessment Report	Kleinfelder (12/10/2021)
JPPS Arboricultural Impact Assessment	(Version 4, 12/10/2021)
Interim Crown Occupation Verification Certificate (ICOVC3)	Philip Chun (24/11/2023)
JPPS School Transport Plan	TTW (23/01/2024)
Out of Hours Event Management Plan (OHEMP)	Jacobs (Rev 1, 14/03/2024)
Community Communication Strategy	SINSW (Rev 3, 08/08/2022)
Staging Report John Palmer Public School SSD-23330227	RCC (Rev 4, 22/01/2024)
Operational Waste Management Plan (OWMP)	(EcCell, 17/07/2023)
Operational Flood Emergency Management Plan (OFEMP)	SCP Consulting (Rev 3, 08/11/2023)
Operations & Maintenance Manual Landscape (Landscape Management Plan-LMP)	Stone Will (25/10/2023)

3.2.1 Other Approvals

At the time of the first construction audit, no other approvals were required for the project.

3.3 Compliance Performance

Compliance performance as assessed against each of the conditions of consent of SSD 23330227 is presented in detail in Appendix E. The evidence (documentation, interviews and site visit observations) assessed to determine compliance, along with a summary of the finding, is presented. All non-compliances identified during the audit are identified, even if the non-compliance was addressed prior to the finalisation of the audit. A unique identifier has been allocated to non-compliances (A3_NC#) and recommendations presented. Photographs taken during the site visit as evidence to support the findings is presented in Appendix D.

A summary of compliance findings against the SSD 23330227 conditions of consent is presented in the table below.

Table 6: Summary of compliance findings

Consent Schedule	Number of Conditions	Compliant	Non-compliant	Not triggered
Part A – Administrative Conditions	35	20	3	12
Part B - Prior To Commencement of Construction	32	2	1	29
Part C- During Construction	41	6	1	34
Part D – Prior to Commencement of Operation	35	10	12	13
Part E – Post Occupation	14	7	2	5
Appendix 1 – Advisory Notes	12	4	0	8
Appendix 2 - Written incident notification and reporting requirements	4	0	0	4
Total	173	49	19	105

3.4 Summary of agency notices, orders, penalty notices or prosecutions

The following penalty notice was issued to the construction contractor:

Penalty Notice issued to Richard Crookes Constructions Pty Ltd (SSD-23330227) Blacktown LGA

On 1 November 2023, NSW Planning issued a \$15,000 Penalty Notice to Richard Crookes Constructions Pty Ltd (RCC) for removing eight trees which were identified for retention at the John Palmer Public School development. In addition to the Penalty Notice, RCC are required to provide and maintain advanced replacement trees. These had not been planted at the time of the site audit.

3.5 Non-compliances

As presented in Table 6, of the 173 conditions of consent, 19 non-compliances were identified. As a non-compliance against condition A2 was triggered as a result of non-compliances recorded against other conditions, a unique identifier has not been allocated.

A summary of the findings is as follows:

3. Non-compliances considered to impact project performance:
 - Three non-compliances relate to way-finding and signage not having been installed at the time of the audit (D21, D29, D30).
 - One non-compliance relating to the installation of landscaping in accordance with the approved plan (D32).
 - Obstruction of car parking spaces resulted in a non-compliance against E10.
4. Non-compliances considered 'administrative' in nature:
 - Ten non-compliances (against A11, A12, D5, D6, D20, D21, D28, D31, D33 and D34) resulted from ineffective implementation of the approved Staging Report. Four of the non-compliances had been closed out, that is, documentation submitted to the Certifier, at the time of the audit. Recommendations are presented to close the remaining.
 - Two non-compliances relate to notifications under conditions B4 and D1 of the commencement of operation.
 - Failure to implement two of the improvement opportunities raised in Audit 3 have resulted in non-compliances against conditions B4 and D34 in this audit.
 - Noise monitoring was not conducted for each stage (E9).

Of the 18 non-compliances, evidence has been provided to confirm the required actions have been delivered to close-out five.

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Table 7: Details of non-compliances against SSD 23330227



#	CoC	Requirement	Audit Finding	Current status
-	A2	The development may only be carried out: (a) in compliance with the conditions of this consent;	A2(a): The audit identified non-compliances against conditions A11, A12, B4, C35, D1, D5, D6, D21, D28, D29, D30, D31, D32, D33, D34, E9, E10. The details of the non-compliance and the associated recommendation is discussed in reference to the condition.	Open
A2_NC01	A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	Staging Report (Rev 4, 22/01/2024): Stage 7 update, submitted to the PS on 22/01/2024. Approval (SSD-23330227-PA-33) received on the 29/01/2024 notes the revised Staging Report was not submitted prior to the previously approved timing for Stage 7 operation, being November 2023, under SSD-23330227-PA-18.	Open
A2_NC02	A12	Where construction or operation is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report.	As above.	Open
A2_NC03	B4	If the construction or operation of the development is to be staged, the Planning Secretary must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Commencement of operation: Stage 2 & 3 (Library, Hall, Staff Room) - 06/10/2023. No notification issued (non-compliant) Stage 4 (Building N) - 27/10/2023: notification issued on the 26/10/2024 which states 30/10 (non-compliant). (Note: as documented in the Audit 3 report, this condition was clarified during the site visit and reiterated in A3_IO020).	Open
A2_NC04	C35	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.	DOC24/75756: Request from DE to deliver the first operational audit within 26 weeks of Stage 6, rather than Stage 7 due to delays in approval of Stage 7 by Council. No approval received. Audit 4 delivery methodology is in conformance with the IAPAR.	Open

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#	CoC	Requirement	Audit Finding	Current status
A2_NC05	D1	At least one month before commencement of operation, the date of commencement of the operation of the development must be notified to the Planning Secretary in writing. If the operation of the development is to be staged, the Planning Secretary must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Commencement of operation: Stage 4 (Building N) - 27/10/2023: Notification on the 04/10/2024 (non- compliant). Stage 5 (Block D refurb) - 29/11/2023: notification on the 04/10/2024 and updated 09/11/2024 (non-compliant)	Open
A2_NC06	D5	Prior to the commencement of operation, a certificate/s from a registered engineer must be obtained and submitted to Council verifying that the constructed stormwater quality control system and stormwater conservation system will function effectively in accordance with Blacktown City Council Development Control Plan Part J – Water Sensitive Urban Design and Integrated Water Cycle Management.	The certificate/s from a registered engineer had not been obtained at the time of the audit, however, the Staging Report states: One Survey/Certs/WAE drawings to be issued following completion of Stage 6 to capture all works within the boundary.	Open
A2_NC07	D6	Prior to commencement of operation, a certificate from a registered engineer must be lodged with Council verifying that the structures associated with the rainwater tank and stormwater treatment system(s) have been constructed to withstand all loads likely to be imposed during the lifetime of the structures.	This had not been obtained at the time of the audit, however, the Staging Report states: One Survey/Certs/WAE drawings to be issued following completion of Stage 6 to capture all works within the boundary.	Open
A2_NC08	D20	Prior to the commencement of operation or other timeframe agreed in writing by the Planning Secretary, evidence must be submitted to the Certifier that demonstrates that works associated with the reconfiguration of the existing onsite car park to create 35 car parking spaces (including two accessible spaces) plus the additional spaces required under condition B1 (unless otherwise approved by the Planning Secretary under condition B2) have been completed.	DPE SSD-23330227-PA-18: DPE agree to the proposed time extension to complete the Car Parking Arrangements and Landscaping prior to Stage 6 (November 2023), under conditions D20 and D32 of SSD-23330227. Not delivered for Stage 6 as approved and stated in the Staging Report.	Open
A2_NC09	D21	Prior to the commencement of operation, compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the Certifier: (d) appropriate pedestrian and cyclist advisory signs are to be provided.	Not delivered prior to Stage 6 as stated in the Staging Report. d) No signage observed during the site visit.	Open Open

Independent Audit 4– John Palmer Public School



#	CoC	Requirement	Audit Finding	Current status
A2_NC10	D28	Prior to the commencement of operation, a Stormwater Operation and Maintenance Plan (SOMP) is to be submitted to the Certifier. The SOMP must ensure the proposed stormwater quality measures remain effective and contain the following:	Submitted to the certifier on the 18/03/2024, following commencement of Stage 6. Staging Report states Stage 6.	Closed
A2_NC011	D29	Prior to the commencement of operation, way-finding signage and signage identifying the location of staff car parking must be installed.	No car parking wayfinding identified during the site visit.	Open
A2_NC012	D30	Prior to the commencement of operation, bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas.	No bicycle wayfinding identified during the site visit.	Open
A2_NC013	D31	Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Certifier. The Waste Management Plan must:	The final OWMP (Rev2, 17/08/2023) to satisfy D31 was submitted to the Certifier on the 01/05/2024. The Staging Report identifies that the plan should have been submitted prior to the commencement of Stage 6.	Closed
A2_NC014	D32	Prior to the commencement of operation or other timeframe agreed by the Planning Secretary, landscaping of the site must be completed in accordance with landscape plan(s) listed in condition A2(d).	<p>The Landscape Installation Certificate was accepted by the certifier in ICOVC3, issued prior to Stage 6. However, the defects report prepared by Jacobs on the 05/04/2024 identified a number of defects including missing trees. This was confirmed during the site visit on the 17/04/2024.</p> <p>The 'Dry Creek Bed' Rip Rap near Learning Circle 1 was observed to contain about 10cm of water, despite no rain on the days prior to the audit. Refer to the photos in Appendix D. This is safety concern as there are only movable barriers in place to prevent access to the area. The area does not appear to have been established as detailed on the approved map.</p>	Open
A2_NC015	D33	<p>Prior to the commencement of operation, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping on-site and submit it to the Certifier. The plan must:</p> <p>(a) describe the ongoing monitoring and maintenance measures to manage revegetation and landscaping; and</p>	The plan was prepared prior to Stage 6 commencement however was not submitted to the Certifier until the 18/03/2024, after the commencement of Stage 6.	Closed

Independent Audit 4– John Palmer Public School



#	CoC	Requirement	Audit Finding	Current status
A2_NC016	D34	Prior the commencement of the operation, a Flood Emergency Management Plan must be submitted to the satisfaction of the Planning Secretary that:	In the approved Staging Report, the OFEMP was required to be submitted prior to commencement of Stage 2. The OFEMP was submitted to the Secretary on the 09/10/2023 following the commencement of Stage 2 on the 06/10/2023.	Closed
A2_NC017	E9	The Applicant must undertake short term noise monitoring in accordance with the Noise Policy for Industry where valid data is collected following the commencement of use of each stage of the development. The monitoring program must be carried out by an appropriately qualified person and a monitoring report must be submitted to the Planning Secretary within two months of commencement use of each stage of the development or other timeframe agreed to by the Planning Secretary to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in John Palmer Public School SSDA Noise and Vibration Impact Assessment dated 24 February 2022 and prepared by AECOM (Document number 60654726-RPNV-01_E). Should the noise monitoring program identify any exceedance of the recommended noise levels referred to above, the Applicant is required to implement appropriate noise attenuation measures so that operational noise levels do not exceed the recommended noise levels or provide attenuation measures at the affected noise sensitive receivers.	The approved Staging Report states Stage 5 and monitoring was submitted to the PS on the 11/03/2024, greater than 2 months following the commencement of Stage 5 on the 29/11/2023. (Noting that no formal request was submitted from the Applicant to change the frequency of the monitoring). No further action possible.	Closed
A2_NC018	E10	All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.	During the site visit two shipping containers and two 1,110L waste bins were observed obstructing three spaces in the carpark area (refer to photo in Appendix D). Interviews with Jacobs staff identified that these were the responsibility of the PPP.	Open

3.6 Previous Audit Recommendations

The Applicant responses were identified from the Department of Education (School Infrastructure) letter DOC23/821228 Upgrades to John Palmer Public School (SSD-23330227): *Submission of Independent Audit Report and response in accordance with Condition C37 and C38* (19/05/2023).

The recommendations identified in Audit 3 have been closed out satisfactorily. Of the four improvement opportunities identified in Audit 3. Two have been assessed as being closed out, while failure to implement the other two have resulted in non-compliances against conditions B4 and D34 in this audit.

Table 8: Status of Audit 2 and 3 Recommendations and Improvement Opportunities

Identifier/ Condition	Recommendation/ Improvement Opportunity	Applicant response	Evidence of implementation	Status
Recommendations				
A2_NC05b C19d)	Ensure that a qualified arborist is present should access to the area within the TPZs be required.	The project team will ensure that whenever works within TPZs take place, the arborist is onsite to advise.	<ul style="list-style-type: none"> • Inspection of Tree Protection Measures (McArdle, 07/09/2023) • MEET-154523 TPZ fencing removal (07/12/2023) 	Closed
A3_NC01 C19	<p>Deliver a toolbox as soon as possible to all site staff regarding the requirements for entering TPZs.</p> <p>Ensure that the arborist is present for any entry into the TPZs, including removal of tree protection measures following completion of the works. Maintain all details of any future TPZ entries, including the date, reason, actions taken and evidence of arborist supervision.</p>	<p>Noted. Learning has been taken on board for future projects to ensure clear and sufficient evidence is logged for any works carried out under the supervision of a qualified arborist (dates, activities), including entering TPZs.</p> <p>Learning acknowledged and covered in toolbox talk by Contractor for remaining works.</p>	<p>TPZs were removed during the audit period with works being carried out under the supervision of a qualified arborist (Jim McArdle).</p> <p>Toolbox talk delivered prior to removal.</p>	
Improvement Opportunities				
A3_IO01 A23	For clarity, ensure that only the current version of management plans, strategies, etc. are maintained on the project website.	Noted. The SI Communications manager for the project was informed and the outdated versions of applicable documents removed from the website.	Documents have been updated and condition A23 was assessed as compliant in this audit.	Closed

Identifier/ Condition	Recommendation/ Improvement Opportunity	Applicant response	Evidence of implementation	Status
A3_IO02 B4	Ensure that the Planning Secretary is notified at least 48 hours prior to the commencement of operation for each stage.	Noted. Notification of operations for new Building N has been submitted to DPE.	<p>Identified as non-compliant for this audit.</p> <p>Commencement of operation:</p> <ul style="list-style-type: none"> Stage 2 & 3 (Library, Hall, Staff Room) - 06/10/2023. No notification issued (non-compliant) Stage 4 (Building N) - 27/10/2023: notification on the 26/10/2024 letter states 30/10 (non-compliant). A Project Early Use Certificate was issued by SINSW on the 27/10/2023. Stage 5 (Block D refurb) - 29/11/2023: notification on the 24/11/2024 (compliant) Stage 6 (Misc External Landscaping works following demountables removal) - 30 Jan 2024: notification on the 25/01/2024 (compliant) <p>(Stage 7 - expected July 2024)</p> <p>Can be identified as 'closed' once the Applicants response to this audit report has been accepted by the Planning Secretary.</p>	Open
A3_IO03 B28	Ensure the Operational Waste Management Plan is updated once the operational waste management arrangements are finalised.	Waste pad design issued to certifier and approved within CDVC03.	<p>Included in CDVC03.</p> <p>The Operational Waste Management Plan (Eccell Environmental Management, 17/07/2023) under condition D31 has been updated, however, the date has not been changed.</p>	Closed
A3_IO04 D34	Ensure the FEMP is finalised and submitted to the Planning Secretary for approval prior to operation of Stage 2.	OFEMP has been issued to the Planning Secretary for approval with consultation with the SES included within submission.	<p>The OFEMP was submitted to the Secretary on the 09/10/2023 following the commencement of Stage 2 on the 06/10/2023.</p> <p>Identified as a non-compliance in this audit. Can be identified as 'closed' once the Applicants response to this audit report has been accepted by the Planning Secretary.</p>	Open

3.7 EMP, Sub-Plans and Compliance Documents

As Stage 7 is yet to be delivered the construction environmental management plans are still active for the project and have not been updated since the previous site audit (Audit 3).

The management plans relevant to operations and reviewed for this audit included:

- School Transport Plan (condition D26)
- Operational Waste Management Plan (condition D31)
- Landscape Management Plan (condition D33)
- Operational Flood Emergency Management Plan (condition D34)
- Out of Hours Event Management Plan (School Use) (condition E2)
- Out of Hours Event Management Plan (Community Use) (condition E3)
- Community Communication Strategy (condition E7).

In addition to assessing the compliance of the plans with the relevant conditions of consent, the plan review included the identification of the following:

- The mitigation actions to be implemented to manage project risks and impacts during operation
- Any must/ shall/ will statements, as these present statements of commitment for implementing a process or undertaking an activity
- Statement of Commitments from the Response to Submissions.

Identified mitigation actions and statements of were verified during the site inspection, interviews and review of the document management system. A summary of the findings against the implementation of the operational plans is presented in Table 9.

Table 9: Assessment of the implementation of management plan requirements

Plan	Audit Finding	Improvement Opportunities
Staging Report	<p>Staging Report (Rev 4, 22/01/2024) with the update date for commencement of Stage 7 operation was submitted to the Planning Secretary on the 22/01/2024 following the previously approved timing for Stage 7 operation (November 2023) stated in Rev 2.</p> <p>Numerous non-compliances were identified in relation to incorrect timing for the submission of documentation to the Planning Secretary and/or Certifier in accordance with the Staging Report.</p>	Addressed in the recommendation for A4_NC01 .
Community Communication Strategy (CCS)	The CCS developed for construction is still being implemented for the project. The CCS is available on the project website and no non-compliances were identified.	None identified

Plan	Audit Finding	Improvement Opportunities
School Transport Plan (STP)	<p>The following aspects of the STP were being implemented at the time of the site visit: site access, public transport, pick-up and drop-off, emergency vehicles.</p> <p>Car parking capacity was reduced due shipping containers being stored in three spaces. As the waste bins were not located in the waste storage area at the time of the audit the waste contractors would not be using the access approach described in the plan.</p> <p>Active transport – due to delays to Stage 7 the pre-development options for accessing the school are currently being used.</p> <p>At the time of the audit the Travel Access Guide had not been developed and there was not any evidence available to assess progress towards mode share targets.</p>	Car parking is addressed under A4_NC18 and the waste bins A4IO_2 .
Operational Waste Management Plan (OWMP)	<p>During the site visit mobile general and recycling waste bins were observed around the site. Two 1,100L bins (one each of general and cardboard waste were observed in the carpark area (visible from the street), rather than in the waste storage area. Refer to Appendix D for photographs.</p> <p>All waste classifications and records are provided by the waste contractor monthly and maintained by the PPP.</p>	<p>A4_IO2:</p> <p>Ensure the 1,100L waste bins are stored in the dedicated waste storage area at all times.</p>
Landscape Management Plan (LMP)	The Landscape Installation Certificate was accepted by the certifier in ICOVC3, issued prior to Stage 6. However, the defects report prepared by Jacobs on the 05/04/2024 identified a number of defects including dead trees. This was confirmed during the site visit on the 17/04/2024. Limited weeds were observed.	A4_NC14 under condition D32.
Operational Flood Emergency Management Plan (OFEMP)	No evacuation drills to date. Emergency Assembly Area was not signposted (refer to Appendix D). The Flood Emergency Kit was not accessible at the time of the audit.	<p>A4_IO3:</p> <p>Ensure the Emergency Assembly Area is signposted, as shown in the OFEMP, as soon as possible.</p>
Out of Hours Event Management Plan (School Use)	Implementation of the Out of Hours Event Management Plan had not been initiated at the time of the audit.	None identified.
Out of Hours Event Management Plan (Community Use)		

No notifiable incidents or complaints were registered during the audit period.

3.8 Environmental Management System

In assessing the EMS for the construction of the Project, the audit considered the recommendations of the *Environmental Management Plan Guideline for Infrastructure Projects* (DPIE, April 2020), the key elements of which are identified in Table 10, along with the audit findings against each element. The environmental management framework is described in Section 4 of the CEMP.

Table 10: Review of the project EMS

EMS Element	Audit findings
Relationship to an existing environmental management system	The CEMP is a supplementary document to RCCs Environmental Management System that is certified by Global mark as meeting the requirements of AS/NZS ISO 14001:2016 <i>Environmental Management Systems</i> . RCCs CEMP is part of RCCs Project Management Plan (PMP).
Environmental management structure and responsibilities	The CEMP section 4.2 provides the Environmental Management Structure and Responsibilities for the project.
Legal and compliance requirements	<p>Legal and compliance requirements are detailed in section 4.3 of the CEMP. A compliance matrix has been established to track SSD conditions and consultant requirements. Management of this document in terms of the completeness of the documentation required to confirm full compliance with each condition, and tracking close-out and/or maintenance of consent conditions is not adequate.</p> <p>The Certifier (Philip Chun) also maintains a compliance matrix – Development Consent Matrix for Upgrades to John Palmer Public School.</p>
Training and awareness	<p>Training and awareness requirements are detailed in section 4.3 of the CEMP. RCC employees are required to complete in the RCC general induction and site-specific induction (run daily) prior to attending site, and repeat the site-specific inductions and site walk over at the site. Induction records were sighted in HammerTech. Contractors also participate in the site-specific induction and work under an approved SWMS.</p> <p>This aspect was not reviewed as part of this audit as no construction works were being conducted.</p>
Environmental risk assessment	The risk register is updated monthly, plus every 3 months with the PMP review or following an incident. The amended register is issued to site contractors for the preparation of Safe Work Method Statements.
Environmental management measures	The management measures and actions are detailed in the CEMP Appendix 6.2 Environmental Actions and Monitoring Table, which includes operational controls, corrective and preventative action.
Environmental monitoring and review	Monitoring of objectives is through inspections, audit (internal and external), HammerTech reporting (incidents, corrective actions, etc). No noise or vibration monitoring has been triggered.
Environmental inspection, audit and corrective actions	Inspection includes regular daily visual inspections of work activities, weekly site inspections (verified in HammerTech during the site audit). Post rain events a site walk over is conducted to assess conditions, and areas are closed off to work as required. A start-up internal audit is conducted six weeks from the start of construction. Independent audits are conducted in conformance with the consent.

EMS Element	Audit findings
Communications	<p>Communication processes, particularly between the project team and contractor and subcontractors, are deemed effective and include:</p> <ul style="list-style-type: none"> • A daily Pre-Start Meeting with is held to discuss discussed daily activities, accessibility, control compliance and requirements. • Sharing of relevant documentation (e.g. management plans) via Aconnex and HammerTech. <p>Communications with the community is covered in the induction.</p>

There is a clearly defined, appropriate and effective EMS in place for the implementation of the project.

3.9 Environmental Performance

The environmental performance against environmental aspects relevant to the project, was assessed based on complaints, incidents, notifications and observations during the site visit on the 17 April 2024. The performance of the projected against each aspect is presented in Table 11.

Table 11: Environmental performance

Environmental Aspect	Performance Finding
Noise	<p>No noise complaints have been recorded since Audit 3.</p> <p>Noise level measurements were conducted in conjunction with the projects conditions of consent including items E8 and E9 of the projects SSD 23330227 Conditions of Consent which includes reference to the SSDA Noise and Vibration Impact Assessment dated 24 February 2022 and prepared by AECOM document number: 60654726RPNV-01_E.</p> <p>Attended compliance noise level measurements were conducted on the 7th of March 2024. Based on the results of acoustic testing noise levels resulting from the operation of the mechanical equipment on the site are compliant with the projects items E8 and E9 of the projects SSD 23330227 Conditions of Consent. No excessive noise from the operation of plant and equipment was observed during the site visit.</p>
Water	<p>The 'Dry Creek Bed' Rip Rap near Learning Circle 1 was observed to contain about 10cm of water, despite no rain on the days prior to the audit. Refer to the photos in Appendix D. This is safety concern as there are only movable barriers in place to prevent access to the area. The area does not appear to have been established as detailed on the approved map. This is addressed under the recommendation for A4_NC014.</p>
Waste	<p>Mobile waste bins for general and recycled waste were observed around the site during the site visit. Two 1,100L waste bins were observed in the carpark area, rather than being stored in the waste storage area (refer to photos in Appendix D). Interviews with Jacobs staff identified that these were the responsibility of the PPP. These waste bins should be stored in the dedicated waste storage area. This is addressed under the recommendations for A4_NC018 and A4_IO2.</p>

Environmental Aspect	Performance Finding
Biodiversity Management	<p>TPZs were removed under the supervision of an arborist and following delivery of a toolbox talk.</p> <p>The Defects Report and site visit identified deficiencies in the implementation of the landscaping required under the approved plan, including some dead trees.</p> <p>Six of the eight replacement trees required under the Penalty Notice had been planted (refer to Appendix D for evidence).</p>

The environmental controls implemented across the site were generally in accordance with the conditions of consent and the requirements of the conditions of consent or relevant management plans.

3.10 Consultation Outcomes

A summary of the consultation requests and audit findings is presented in Table 12. Full details of the consultation is provided in Appendix B.

Table 12: Summary of consultation

Agency	Comments provided	Audit Finding
AUDIT 4		
DPE	<ul style="list-style-type: none"> The Department does not require any additional issues for inclusion within the scope of the Audit that are not already captured by the Consent, and the Department's Independent Audit Post Approval Requirements (May 2020). 	<ul style="list-style-type: none"> Not applicable.

3.11 Complaints

The management of enquiries and complaints in relation to the project are detailed in Section 6.5 of the Community Communication Strategy (CCS). SINSW is responsible for managing complaints and maintaining the complaints register for the development.

During project delivery, a complaint is defined as to construction impacts, such as safety, dust, noise, traffic, congestion, loss of parking, contamination, loss of amenity, hours of work, property damage, property access, service disruption, conduct or behaviour of construction workers, other environmental impacts, unplanned or uncommunicated disruption to the school.

The following contact details are provided on the project website

(<https://www.schoolinfrastructure.nsw.gov.au/projects/john-palmer-public-school-upgrade.html>) as:

- Mail: GPO Box 33, Sydney, NSW 2001
- Email: schoolinfrastructure@det.nsw.edu.au

No complaints have been recorded since Audit 3. As required under condition A23 a complaints register is updated monthly and made publicly available on the project's website.

3.12 Incidents

Details of contractor incident management is provided in section 4.12 and 4.13 of the CEMP. No environmental incidents were recorded in the project incident register during the audit period.

3.13 Actual versus Predicted Environmental Impacts

The purpose of this section is to review the predicted operational impacts and suggested mitigation and management measures from the EIS (Architectus Australia, 13/10/2021) against the actual impacts and mitigation measures implemented as part of the project delivery. Environmental impacts associated with various aspects of the development are summarised in Section 6 – *Assessment of Impacts* of the EIS.

The impacts are presented in Table 13, along with an assessment against the actual impacts of the project identified through the audit.

Table 13: Actual Verses Predicted Operational Environmental Impacts

EIS – Impacts Identified	Assessment of actual impacts
<p>Noise – Section 6.9 and Appendix S</p> <p>The proposed increase of 943 students to 1,012 students results in a predicted increase of less than 1 dB(A) from existing capacity to the proposed new capacity.</p>	<p>Results of acoustic testing noise levels resulting from the operation of the mechanical equipment on the site are compliant with the projects conditions E8 and E9 of the projects SSD 23330227.</p> <p>No excessive noise from the operation of plant and equipment was observed during the site visit. No noise complaints recorded.</p>
<p>Light spill - Section 6.9</p> <p>All outdoor lighting will comply with AS/NZS4282:2019 Control of the obtrusive effects of outdoor lighting. As such, the proposed development is not anticipated to result in any significant light spill impacts</p>	<p>Compliance with AS/NZS4282:2019 <i>Control of the obtrusive effects</i> of outdoor lighting verified in this audit.</p> <p>No complaints relating to lighting.</p>
<p>Traffic, transport and accessibility – Section 6.7 and Appendix O</p> <p>The traffic impacts as a direct result of the proposed development are considered negligible and acceptable in the context of the local network.</p> <p>On completion of the proposed works, the development is proposed to accommodate 35 (including 2 accessible spaces) on-site staff car parking spaces</p>	<p>No traffic complaints.</p> <p>The site visit identified 35 car spaces and 8 staff and 28 student bicycle spaces.</p> <p>During the site visit two shipping containers and two 1,100L waste bins were observed obstructing three spaces in the carpark area (refer to photo in Appendix D). Interviews with Jacobs staff identified that these were the responsibility of the PPP.</p>
<p>Waste – Section 6.13 and Operational Waste Management Plan</p> <p>A sealed area is proposed in the existing car park for storage and collection of the applicable waste streams. The waste storage area is sized (approximately 100sqm) to accommodate all bins or containers. The bins will be suitably screened from public view.</p>	<p>Two 1,100L waste bins were observed in the carpark area, rather than being stored in the waste storage area (refer to photos in Appendix D). The waste bins should be stored in the dedicated waste storage area. This is addressed under the recommendations for A4_NC018 and A4_IO2.</p>

EIS – Impacts Identified	Assessment of actual impacts
<p>Biodiversity – Section 6.8 and Appendix R</p> <p>The proposed development is highly unlikely to have significant impacts upon defined biodiversity values, as the area to be modified is very small, and comprises isolated native planted vegetation or exotic grassland (managed). No threatened species or ecological communities were identified. 36 trees are proposed to be removed from the site.</p>	<p>Eight trees were removed from the site, in addition to the 36 identified in the AIA. Penalty notice issued to RCC to provide and maintain advanced replacement trees. These had not been planted at the time of the audit.</p>

For most impacts, the actual impact of the development at the time of the audit were equivalent to or less than the assessed or predicted impacts identified in the EIS. Impacts have been mitigated through the implementation and maintenance of appropriate and effective management measures.

3.13.1 Project Boundary

The site visit confirmed that the project boundary conforms with the approved boundary as shown in the approved site plan (DA-AR-0010 Rev B 08/10/2021).

3.14 Site Inspection

A site inspection was conducted on 17 April 2024 during which observations on the project's environmental performance were recorded and photographs taken. A number of issues and improvement opportunities were identified during the site walk over, including:

- Remediation of the 'Dry Creek Bed' Rip Rap near Learning Circle 1 which contained about 10cm of water, despite no rain on the days prior to the audit. This was noted as a safety hazard.
- Replacement of dead trees and plants
- Ensuring signage and wayfinding is installed
- Removal of the shipping containers in the carpark area and placement of the 1,100L waste bins into the waste storage area.

3.15 Site Interviews

Site interviews were structured around the SSD 23330227 conditions of consent and how the project demonstrates compliance with each condition and assessing understanding of environmental risk and performance management requirements on site.

The site walkover included discussion of defects and outstanding actions.

3.16 Previous Annual review or Compliance Report Recommendations

There has been no previous compliance reports or annual reviews for the project.

4 Recommendations

4.1 Non-Compliance Recommendations

The 13 recommendations to rectify the non-compliances identified during the audit are presented in Table 14.

Table 14: Non-compliance recommendations

ID	CoC	Recommendation	Status
A4_NC01	A11	Conduct a regular review of the Staging Report, in particular Appendix A, to ensure that the timing of any requirements and conditions associated with Stage 7 are met. Should any delays or changes be identified, the Staging Report is to be updated and issued to the Planning Secretary for approval prior to any 'anticipated date' stated in the Staging Report relevant to the delay or change.	Open
A4_NC02	A12		
A4_NC03	B4	Ensure that the Planning Secretary is notified in writing at least 48 hours before the commencement of operation for Stage 7.	Open
A4_NC04	C35	Ensure compliance with the frequency and timeframe for independent audits, as specified in IAPAR.	Open
A4_NC05	D1	Ensure that the Planning Secretary is notified in writing at least one month prior to the commencement of operation of Stage 7.	Open
A4_NC06	D5	Obtain a certificate/s from a registered engineer verifying that the constructed stormwater quality control system and stormwater conservation system will function effectively in accordance with Blacktown City Council Development Control Plan Part J – Water Sensitive Urban Design and Integrated Water Cycle Management and submit to Council as soon as possible.	Open
A4_NC07	D6	Obtain a certificate/s from a registered engineer verifying that the structures associated with the rainwater tank and stormwater treatment system(s) have been constructed to withstand all loads likely to be imposed during the lifetime of the structures and submit to Council as soon as possible.	Open
A4_NC08	D20	Submit evidence to the Certifier that demonstrates works associated with the reconfiguration of the existing onsite car park to create 35 car parking spaces (including two accessible spaces) have been completed as soon as possible.	Open
A4_NC09	D21	Submit evidence to the Certifier that demonstrates, compliance with the requirements for secure bicycle parking and end-of-trip facilities (following installation of signage required under D21(d). (d) Ensure pedestrian and cyclist advisory signs are installed as soon as possible.	Open
A4_NC11	D29	Ensure car parking way-finding is installed as soon as possible.	Open
A4_NC12	D30	Ensure bicycle way-finding is installed as soon as possible.	Open

ID	CoC	Recommendation	Status
A4_NC14	D32	Conduct an immediate review of the installation of the 'Dry Creek Bed' Rip Rap near Learning Circle 1 and rectify any deficiencies as soon as possible. Ensure all defects identified in the Jacobs defects report dated 05/04/2024, and as shown in photos in Appendix D, are closed out as soon as possible.	Open
A4_NC17	E9	Ensure noise monitoring is conducted in accordance with condition E9 following Stage 7, or prior to the commencement of Stage 7 seek approval from the Planning Secretary that the current noise monitoring is sufficient.	Open
A4_NC18	E10	Remove the shipping containers and waste bins from the car park and ensure that the PPP and other relevant stakeholders are advised in writing of the requirements of condition E10 and that all driveways, footways and parking areas must be unobstructed at all times.	Open

4.2 Improvement Opportunities

Opportunities for improvement identified through the audit process are presented in Table 15.

Table 15: Opportunities for improvement

ID	CoC/ MP	Improvement Opportunity	Status
A4_IO01	D33(a)	Update the LMP to include clarification regarding what will happen after the first 12 months, for example, that the plan will be reviewed and revised and the PPP will be responsible for implementation.	Open
	E14		
A4_IO02	OWMP	Ensure the 1,100L waste bins are stored in the dedicated waste storage area at all times.	Open
A4_IO03	OFEMP	Ensure the Emergency Assembly Area is signposted, as shown in the OFEMP, as soon as possible.	Open

4.3 Key Strengths

The key strengths identified in relation to the management of the project include:

- Management processes are in place between the Applicant and Construction Contractor to ensure any incomplete works and defects are closed out appropriately.

5 Audit Conclusion

The delivery of the audit methodology has been conducted in accordance with the *Independent Audit Post Approval Requirements* (DPIE, May 2020) and the AS/NZS ISO 19011:2014 – *Guidelines for Auditing Management Systems*. The audit report documents the outcomes of the review of compliance against the conditions of consent, as undertaken by Arcadis.

The audit process comprised of:

- The issue of the RFI Register and subsequent document review
- An opening and closing meeting and site visit conducted on the 17 April 2024
- Post-site visit document review and follow up
- Issuing of draft audit report
- Post-draft audit report review and provision of additional documentation
- Issuing of Final Report (this report).

Of the 173 conditions of consent, 19 non-compliances against conditions were identified, of which were summarised as:

1. Non-compliances considered to impact project performance:
 - Three non-compliances relate to way-finding and signage not having been installed at the time of the audit.
 - One non-compliance relating to the installation of landscaping in accordance with the approved plan.
 - Obstruction of car parking spaces resulted in a non-compliance against E10.
2. Non-compliances considered 'administrative' in nature:
 - Ten non-compliances resulted from ineffective implementation of the approved Staging Report. Four of the non-compliances had been closed out, that is, documentation submitted to the Certifier, at the time of the audit. Recommendations are presented to close the remaining.
 - Two non-compliances relate to notifications under conditions B4 and D1 for the commencement of operation.
 - Failure to implement two of the improvement opportunities raised in Audit 3 have resulted in non-compliances against conditions B4 and D34 in this audit.
 - Noise monitoring was not conducted for each stage.

Thirteen recommendations have been proposed to rectify existing non-compliances or prevent future potential non-compliances. Three improvement opportunities were identified.

Appendix A. Letter of Approval of Independent Auditor

Department of Planning and Environment

Mr Grant Anderson
School Infrastructure NSW
via the Planning Portal

15/06/2022

Dear Mr Anderson

John Palmer Public School (SSD-23330227) - Independent Auditor Nomination

I refer to your request (SSD-23330227-PA-1) for the Secretary's approval of suitably qualified persons to prepare the Independent Audit's for the John Palmer Public School (SSD-23330227). The Department of Planning and Environment (the **department**) has reviewed the nominations and information you have provided and is satisfied that two of the experts are suitably qualified and experienced.

In accordance with Condition C34 of SSD-23330227 (the 'Consent') and the Independent Audit Post Approval Requirements (IAPARs), the Secretary has agreed to the following audit team:

- Ms Denise Day; and
- Ms Belinda Morgan.

The IPARs require auditors to have certification as a lead or principal auditor with a relevant industry body. In the event Ms Kristen Branks can forward evidence to meet this requirement, the department will review the request to include Ms Banks as an auditor under Condition C34 of SSD 23330227. While the approved auditors must carry out the audit, this does not prevent Ms Branks from assisting with the audit.

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

The Independent Audit must be prepared, undertaken and finalised in accordance with the IPARs. Failure to meet these requirements will require revision and resubmission.

The department reserves the right to request an alternate auditor or audit team for future audits. Please also note that this approval of the above audit team is conditional upon the auditor's maintaining certification as a lead or principal auditor with a relevant industry body.

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

Should you wish to discuss the matter further, please contact Elizabeth Williamson on 0282896610 or compliance@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "R. Sherry".

Rob Sherry
Team Leader Compliance - Government Projects
Compliance

As nominee of the Planning Secretary

Appendix B.Evidence of Consultation

Day, Denise

From: Nicholas Kumar <nicholas.kumar@dpie.nsw.gov.au>
Sent: Tuesday, 16 April 2024 9:42 AM
To: Day, Denise
Subject: Consultation requirements - Operations audit for the John Palmer Public School upgrade project (SSD 23330227)

You don't often get email from nicholas.kumar@dpie.nsw.gov.au. [Learn why this is important](#)

Hi Denise,

Thank you for the below email regarding the independent operational audit for the John Palmer Public School upgrade SSD-23330227 (the Consent).

The Department does not require any additional issues for inclusion within the scope of the Audit that are not already captured by the Consent, and the Department's Independent Audit Post Approval Requirements (May 2020).

If you have any questions or concerns regarding the above, please feel free to contact me.

Kind Regards,
Nick

Nicholas Kumar

Senior Compliance Officer – Government Projects

NSW Planning | Department of Planning, Housing and Infrastructure



The Department of Planning, Housing and Infrastructure acknowledges the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

From: Day, Denise <Denise.Day@arcadis.com>

Sent: Monday, 15 April 2024 10:00 AM

To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>

Subject: FW: Consultation requirements - Operations audit for the John Palmer Public School upgrade project (SSD 23330227)

Good morning

I am following up on the request below as the site audit is this Wednesday. Please advise if you have any comments for the audit scope.

Kind regards

Denise Day (*she/her*) BSc (Hons) PgD (EIS)

Principal Environmental Consultant

Arcadis Australia Pacific

Level 16, 580 George Street, Sydney, NSW | 2000 | Australia

T +61 (2) 8907 9178

T +61 (0) 422 384 068
www.arcadis.com

Please note: work days are Monday to Thursday.

From: Day, Denise
Sent: Monday, March 4, 2024 12:01 PM
To: compliance@planning.nsw.gov.au
Subject: Consultation requirements - Operations audit for the John Palmer Public School upgrade project (SSD 23330227)

Good morning

I have been engaged by Schools Infrastructure NSW as the approved Independent Auditor on the John Palmer Public School upgrade project (SSD 23330227). The first operations audit for will be delivered in mid-April 2024. In accordance with the Independent Audit Post Approval Requirements (IAPAR) (DPIE, 2020) I am required to consult with the Department regarding the scope for each audit, and to determine if there are other parties or agencies to be consulted.

Accordingly, can you please provide the following:

- Inputs on the audit scope, including issues or conditions of consent for focus (noting that any ongoing issues identified by the Department for Audit 1 will also be reviewed in Audit 2)
- Details of who is to be consulted as part of the audit process.

Please do not hesitate to call should you wish to discuss.

Kind regards
Denise Day (*she/her*) BSc (Hons) PgD (EIS)
Principal Environmental Consultant
Arcadis Australia Pacific
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www.arcadis.com

Please note: work days are Monday to Thursday.

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Appendix C.Site Audit Agenda and Meetings

AGENDA

Issue date 15/04/2024
Issue to RCC, Jacobs, SINSW
Subject John Palmer Public School Independent Environmental Audit – Site Audit 4
Opening Meeting
Meeting date 17/04/2024
Time 08.30 am – 12.30 pm
Location Onsite
Distribution **Distribution**

ITEM	TIME	DETAIL
1	8.30 – 9.00 am	Opening meeting <ul style="list-style-type: none">• Audit objectives• Audit scope:<ul style="list-style-type: none">○ Compliance with CoC, post approval documents, environmental licences and approvals○ Environmental performance of the development (operations) – actual vs predicted impacts○ Adequacy of management plans○ Conditions relating to vegetation management (DPHI)• Required resources<ul style="list-style-type: none">○ Documentation• Interviews• Audit Methodology<ul style="list-style-type: none">○ IAPAR (DPIE, 2020)• Questions
2	9.00 – 10.30am	Desktop review and Interviews <ul style="list-style-type: none">• Close out of any outstanding information
2	10.30am – 12.00pm	Site walk over <ul style="list-style-type: none">• All areas• Interviews: Site personnel (as required)
4	12.00 - 12.30pm	Closing meeting <ul style="list-style-type: none">• Preliminary audit findings• Recommendations• Post-audit actions

Opening Meeting Attendees - 10/04/2024

Name	Role
Denise Day	Arcadis - Auditor
Vip Patel	SPM Jacobs
Suddeep Bile	APD SIN SW (Assistant Proj Director)
Pedro Franchi	PM Jacobs
Josh Stubbs	Project Engineer (PCC)

Closing Meeting Attendees - 10/04/2024

Name	Role
Josh Stubbs	Proj Engineer
Tom Hennett	PCC Project Manager
DD	
VP	
SB	
PF	

A24 - OBMP → on website
 - Noise Mart report → GHS & JPPS

A27
 A28

~~Staging C35 - 26 weeks over~~
 D26b - Ops mgmt Plan - (times are different)

~~Pedro - GHS Tree list + CI~~ D29e - Landscape mgmt Plans complete
~~Tree - C19 - Ward, Shindler~~ b) -

~~Pendleton~~
 Kleinfelder - program?
 BMP.

Appendix D.Site Inspection Photographs

Buildings



Photo 1: Refurbishment and extension Hall – Block BH (Stage 2)



Photo 2: New Library – Block BL (Stage 2)



Photo 3: refurbishment and extension to the Staff room - Block A (Admin) (Stage 3)



Photo 4: Hydrant pump room (Stage 3)



Photo 5: new Block N (houses homebases, practical activity areas and amenities) (Stage 4)



Photo 6: new Block N (Stage 4)



Photo 7: refurbishment of Block D (Stage 5)

Landscaping associated with buildings



Photo 8: Landscaping associated with the Hall and Library (note dead tree at the back)



Photo 9: Landscaping associated with the Hall and Library (note dead tree)



Photo 10: Landscaping associated with the Hall and Library



Photo 11: Landscaping along the northern boundary of the site (Block N)



Photo 12: Landscaping between Block N and the Covered Outdoor Learning Area (COLA)



Photo 13: Landscaping along the northern boundary of the site (Block N) noting dead tree



Photo 14: Landscaping at the northeast boundary of the site (Block N)



Photo 15: Landscaping along the eastern boundary of the site (Block N) (Noting four of the eight trees required to be planted under the Penalty Notice)



Photo 16: Landscaping along the eastern boundary of the site (Block N) (Noting two of the eight trees required to be planted under the Penalty Notice)

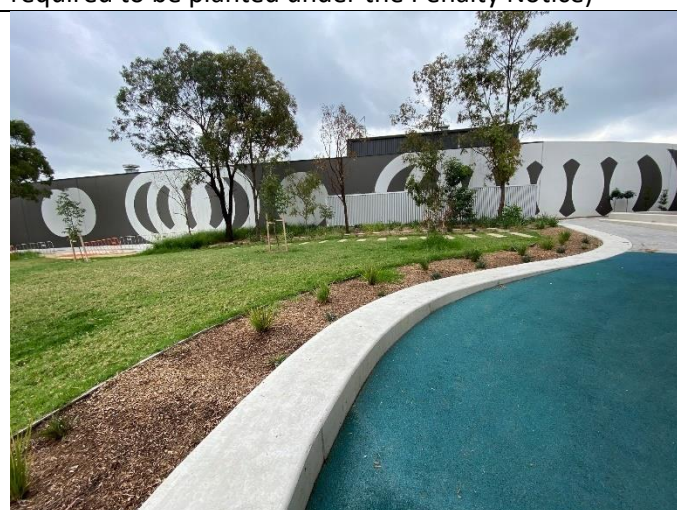


Photo 17: Landscaping along the western boundary of Block N

Stage 6 Landscaping and Works



Photo 19: Area between the tree lined walkway and the COLA

Photo 18: Tree lined walkway



Photo 20: Landscaping along the northern boundary of the site (looking west)



Photo 21: Landscaping along the northern boundary of the site (looking east)



Photo 22: Landscaping northwest boundary of the site



Photo 23: 'Dry Creek Bed' Rip Rap near Learning Circle 1 noting lack of reeds and pooled water to a depth of about 10 cm



Photo 24: Bicycle parking area



Photo 25: Bicycle parking area outside the Staff room



Photo 26: Staff car park area noting two shipping containers and two waste skips blocking parking spaces



Photo 27: Waste storage area.

Appendix E. Audit Table

CoC Number (ID)	Compliance Requirement	Evidence	Independent Audit Finding	Compliance Status	Recommendations/Improvement opportunities	Noncompliance ID
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.	Incident reports and notifications Audit findings	No notifiable incidents or notices, prosecutions, etc. for the audit period. Generally, the requirements specified in relevant plans to prevent and minimise any material harm to the environment that may result from the operation of the development have been implemented.	Compliant		
A2	The development may only be carried out:		Non-compliances recorded against conditions, as noted in A2(a) below.	Non-compliant		A unique identifier has not allocated as this non-compliance is addressed under condition C19.
A2a	in compliance with the conditions of this consent;	Audit findings	The audit identified no non-compliances against conditions A11, A12, B4, C35, D1, D5, D6, D21, D28, D29, D30, D31, D32, D33, D34, E9, E10. The details of the non-compliance and the associated recommendation is discussed under this condition.	Non-compliant		
A2b	in accordance with all written directions of the Planning Secretary;	Letter DPE SSD-23330227-PA-18 <i>Upgrades to John Palmer Public School (SSD-23330227) Staging Report, Conditions A9 and A10</i> (21/07/2023) DPE correspondence SSD-23330227-PA-23: Operational Flood Emergency Management Plan and SES Consultation Evidence Conditions D34 and D35 (15/11/2023) Correspondence: DPE SSD-23330227-PA-33 <i>Upgrades to John Palmer Public School (SSD-23330227) Revised Staging Report, Conditions A13 and A14</i> (29/01/2024)	<u>SSD-23330227-PA-18</u> : Approval of the Staging Report (10/07/2023) July 2023, under condition A9 of SSD-23330227, subject to all works being completed to facilitate full operation of the school prior to student numbers increasing for Day 1 Term 1 2024, where no further revised operation staging will be required. The Staging Report has subsequently been updated to account for delays in delivering Stage 7. Student numbers did not increase Day 1 Term 1 2024: 967 vs 1,026 at the end of 2023 (based on a discussion with the school Principal on the 30/04/2024) - Not triggered <u>SSD-23330227-PA-23</u> : the OFEMP is to be reviewed on an annual basis, and after past flood events - Not triggered Make the approved OFEMP available for public access on the project website at the earliest convenience - Compliant . <u>SSD-23330227-PA-33</u> : ensure that the existing mitigation measures and procedures that have been in place prior to, and during, operation remain in place for safe school access until all Public domain works are completed - works had not started at the time of the audit - compliant - implement the approved School Transport Plan under SSD-23330227-PA-30 - Compliant - submit an update to the Planning Secretary within three (3) months of this approval, outlining the status of the required Public domain works are completed (due 29/04/2024) - not triggered .	Compliant		
A2c	generally in accordance with the EIS and Response to Submissions;	EIS JPPS Architectus (Rev B, 13/10/2021) RTS JPPS Architectus (Rev B, 14/01/2022)	To date the development has been carried out generally in accordance with the EIS and RTS.	Compliant		
A2d	in accordance with the approved plans in the table below and as amended by condition B1:	INTERIM CROWN OCCUPATION VERIFICATION CERTIFICATE (ICOVC3) (24/11/2023)	Certificates confirming compliance with the approved plans for works to date have been approved by the Certifier.	Compliant		
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:			Compliant		
A3a	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;		RFIs issued by the PS in relation to 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 have been addressed.	Compliant		
A3b	any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and		No written directions received.	Not triggered		

A3c	the implementation of any actions or measures contained in any such document referred to in (a) above.		Refer to A2(b).	Compliant		
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Noted	No inconsistencies identified.	Compliant		
A5	This consent lapses five years after the date of consent unless work is physically commenced.	Letter to Secretary See CoC B3	Construction commenced on the 11/07/2022, within the required timeframe.	Not triggered		
A6	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	INTERIM CROWN OCCUPATION VERIFICATION CERTIFICATE (ICOVC3) (24/11/2023) Audit findings	Part 6, Division 8A not in the version of the EP&A Regulation at the time of consent approval. Some provisions are provided under Part 4, Division 2, Subdivision 1. The project is compliant with the relevant clauses.	Compliant		
A7	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.	Details of disputes	No disputes identified.	Compliant		
A8	Where conditions of this consent require consultation with an identified party, the Applicant must:	Consultation details: TfNSW BCC Utilities Community NBN Telstra (survey works) Email: DET to SINSW/Jacobs/RCC (13/03/2023) MCR meeting minutes Telstra engagement	Consultation is required under the following conditions prior to or during construction (refer to each condition for details): A15 - n/a B32 - see comments for B32 D26 - see comments for D26 D35 - see comments for D35 E1 and E3 - see comments for E1 -3 (work in progress) E13 - n/a (see folder E condition tracker) Consultation has been conducted as required, unless not triggered.	Compliant		
A8a	consult with the relevant party prior to submitting the subject document for information or approval; and		Consultation has been conducted as required, unless not triggered. For some conditions documentation has been submitted to the Certifier for review prior to being submitted to the required stake holder for consultation.	Compliant		
A8b	provide details of the consultation undertaken including:		Consultation evidence is provided in appendices to relevant reports plans, strategies, etc. and/or is maintained as records. The details are discussed under the relevant conditions.	Compliant		
A8bi	the outcome of that consultation, matters resolved and unresolved; and		Consultation evidence is provided in appendices to relevant reports plans, strategies, etc. and/or is maintained as records. The details are discussed under the relevant conditions.	Compliant		
A8bii	details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Interviews Consultation evidence	No disagreements were identified through the consultation evidence and audit interviews.	Compliant		
A9	The project may be constructed and operated in stages. Where compliance with conditions is required to be staged due to staged construction or operation, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the satisfaction of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).	Staging Report John Palmer Public School SSD-23330227 (Rev 4 22/01/2024) Correspondence: DPE SSD-23330227-PA-18 Upgrades to John Palmer Public School (SSD-23330227) Staging Report, Conditions A9 and A10 (21/07/2023) Correspondence: DPE SSD-23330227-PA-33 Upgrades to John Palmer Public School (SSD-23330227) Revised Staging Report, Conditions A13 and A14 (29/01/2024)	Staging applies to Operations only. Staging Report (Rev 2, 30/05/2023): submitted to the PS on the 05/06/2023, prior to the commencement of Stage 1 of operations on the 17/07/2023. Approval received on the 21/07/2023.	Compliant		

A10	A Staging Report prepared in accordance with condition A9 must:			Compliant		
A10a	if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish;		Addressed in previous construction audits.	Not triggered		
A10b	if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant);	Staging Report John Palmer Public School SSD-23330227 (Rev 4 22/01/2024)	Section 2.2.2 of the Staging Report details the staggered commencement of operation across 7 stages to enable the school to commence operating their new and upgraded facilities as they reach completion.	Compliant		
A10c	specify how compliance with conditions will be achieved across and between each of the stages of the project; and	Staging Report John Palmer Public School SSD-23330227 (Rev 4 22/01/2024)	Section 3 and Appendix A Condition Compliance Matrix.	Compliant		
A10d	set out mechanisms for managing any cumulative impacts arising from the proposed staging.	Staging Report John Palmer Public School SSD-23330227 (Rev 4 22/01/2024)	Section 4.	Compliant		
A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	Staging Report John Palmer Public School SSD-23330227 (Rev 3 17/01/2024) Staging Report John Palmer Public School SSD-23330227 (Rev 4 22/01/2024) Correspondence: DPE SSD-23330227-PA-33 Upgrades to John Palmer Public School (SSD-23330227) Revised Staging Report, Conditions A13 and A14 (29/01/2024) Audit findings	Staging Report (Rev 3, 17/01/2024): Stage 7 update, submitted to the PS on 17/01/2024. Cover letter included the reasoning for the change due to the lengthy approval process with BCC and delay on receiving the S138. RFI and discussion with DPHI and additional evidence provided in relation to the delay of Stage 7. Updated to Rev 4 with adjusted dates for Stage 6 & 7 to reflect the dates provided in the D1 letter submission to DPHI prior to approval of Rev 3. Staging Report (Rev 4, 22/01/2024): Stage 7 update, submitted to the PS on 22/01/2024. Approval (SSD-23330227-PA-33) received on the 29/01/2023 notes the revised Staging Report was not submitted prior to the previously approved timing for Stage 7 operation, being November 2023, under SSD-23330227-PA-18. It also noted the key reason for the delays in obtaining a section 138 permit for the Public domain works from BCC and that SINSW is in the process of addressing comments provided by the Local Traffic Committee on the Public domain works design, and aims to resubmit the revised plans to Council by mid-February 2024 for approval.	Non-compliant	Conduct a regular review of the Staging Report, in particular Appendix A, to ensure that the timing of any requirements and conditions associated with Stage 7 are met. Should any delays or changes be identified, the Staging Report is to be updated and issued to the Planning Secretary for approval prior to any 'anticipated date' stated in the Staging Report relevant to the delay or change.	A4_NC01
A12	Where construction or operation is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report.	Staging Report John Palmer Public School SSD-23330227 (Rev 4 22/01/2024) Correspondence: DPE SSD-23330227-PA-33 Upgrades to John Palmer Public School (SSD-23330227) Revised Staging Report, Conditions A13 and A14 (29/01/2024) Audit findings	Refer to condition A11.	Non-compliant	As above.	A4_NC02
A13	The Applicant may:			Compliant		
A13a	(a) prepare and submit any strategy, plan (including management plan, architectural or design plan) or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan (including management plan, architectural or design plan) or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan (including management plan, architectural or design plan) or program);		No strategy, plan (including management plan, architectural or design plan) or program required by this consent is being delivered on a staged basis.	Not triggered		
A13b	combine any strategy, plan (including management plan, architectural or design plan), or program required by this consent (if a clear relationship is demonstrated between the strategies, plans (including management plan, architectural or design plan) or programs that are proposed to be combined); and		The Out of Hours Event Management Plan (School Use) (E1) and Out of Hours Event Management Plan (Community Use) have been combined.	Compliant		

A13c	update any strategy, plan (including management plan, architectural or design plan), or program required by this consent (to ensure the strategies, plans (including management plan, architectural or design plan), or programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	Correspondence: DPE SSD-23330227-PA-33 Upgrades to John Palmer Public School (SSD-23330227) Revised Staging Report, Conditions A13 and A14 (29/01/2024)	Refer to condition A11 regarding updates on the Staging Report.	Compliant		
A14	Any strategy, plan or program prepared in accordance with condition A13, where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary.	Correspondence: DPE SSD-23330227-PA-33 Upgrades to John Palmer Public School (SSD-23330227) Revised Staging Report, Conditions A13 and A14 (29/01/2024)	DPE SSD-23330227-PA-33: satisfied that the revised Staging Report, Version 04 dated 22 January 2024, has been prepared in accordance with condition A14 of SSD-23330227.	Compliant		
A15	If the Planning Secretary agrees, a strategy, plan (including management plan, architectural or design plan), or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.		Consultation waiver not requested.	Not triggered		
A16	Updated strategies, plans (including management plan, architectural or design plan), or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan, program or drawing.	Audit Findings Site Visit	Updated strategies, plans (including management plan, architectural or design plan) have been implemented.	Compliant		
A17	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. <i>Note: Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development.</i>	ICOVC3 (Philip Chun, 24/11/2023)	BCA compliance verified through ICOVC3 and associated certificates.	Compliant		
A18	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	External Wall System Certificate (Installation) External and Common Wall Components (Type A & B Construction) - Stage 5 - Block D refurbishment works (Nick Ceiling, 13/09/2023) External Wall System Certificate (Installation) External and Common Wall Components (Type A & B Construction) - Stage 4 Block N New Building (Nick Ceiling, 13/09/2023) Interim Crown Occupation Verification Certificate (ICOVC3) - Building D and N. Crown Occupation Verification Certificate Requirements List R01 (15/09/2023)	Certificates for Stage 5 - Block D refurbishment works and Stage 4 Block N New Building. Included in ICOVC3. Certifier signed off on the products and systems used on the 13/09/2023.	Compliant		
A19	The external colours, materials and finishes of the buildings must be consistent with the approved plans referenced in Condition A2. Any minor changes to the colour and finish of approved external materials may be approved by the Certifier provided:	As above	The Notification Letter (External Walls and Cladding) includes references to colours being used. Crown Verification Certificate 2 provides approval by the Certifier.	Compliant		
A19a	the alternative colour/material is of a similar tone/shade and finish to the approved external colours/building materials;	As above	As above.	Compliant		
A19b	the quality and durability of any alternative material is the same standard as the approved external building materials; and	As above	As above.	Compliant		
A19c	a copy of any approved changes to the external colours and/or building materials is provided to the Planning Secretary for information.	As above	As above.	Compliant		
A20	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.		Noted: as required stated versions were referenced.	Compliant		

A21	Consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, <u>Standard or policy, or a replacement of them.</u>	Secretary directions	No directions issued under this condition.	Not triggered		
A22	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, Site audit report and independent auditing. <i>Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i>	Noted		Compliant		
A23	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:			Compliant		
A23a	(a) make the following information and documents (as they are obtained or approved) publicly available on its website:	https://www.schoolinfrastructure.nsw.gov.au/projects/i/john-palmer-public-school-upgrade.html	The project website was accessed on the 16/04/2023 in assessing compliance with this condition.	Compliant		
A23ai	(i) the documents referred to in condition A2 of this consent;	https://www.schoolinfrastructure.nsw.gov.au/projects/i/john-palmer-public-school-upgrade.html#category-reports	Compliant	Compliant		
A23aii	(ii) all current statutory approvals for the development;	https://www.schoolinfrastructure.nsw.gov.au/projects/i/john-palmer-public-school-upgrade.html#category-reports	Compliant	Compliant		
A23aiii	(iii) all approved strategies, plans and programs required under the conditions of this consent;	https://www.schoolinfrastructure.nsw.gov.au/projects/i/john-palmer-public-school-upgrade.html#category-reports	Approved strategies, plans and programs: Staging Report (A9) - Rev 4 PS approved, uploaded School Transport Plan (D26) - PS approved, uploaded Operational Flood Emergency Management Plan (D34) - PS approved, uploaded Operational Out of Hours Event Mgmt Plan - uploaded Operational Waste Management Plan - uploaded Operational Landscape Management Plan - uploaded	Compliant		
A23aiv	(iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;	https://www.schoolinfrastructure.nsw.gov.au/projects/i/john-palmer-public-school-upgrade.html#category-reports	No performance reporting requirements.	Not triggered		
A23av	(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;	https://www.schoolinfrastructure.nsw.gov.au/projects/i/john-palmer-public-school-upgrade.html#category-reports	John Palmer Public School Post Completion Noise Compliance Testing (08/03/2024) uploaded.	Compliant		

A23avi	(vi) a summary of the current stage and progress of the development;	www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/i/john-palmer-public-school/2023/june/JPPS_Project_Update_JUNE_-_FINAL.pdf	One update reports issued since Audit 3 (October 2023).	Compliant		
A23avii	(vii) contact details to enquire about the development or to make a complaint;	https://www.schoolinfrastructure.nsw.gov.au/projects/i/john-palmer-public-school-upgrade.html#community-info-tab	Get Involved' tab provides feedback contact form. Contact us: Level 8, 259 George Street, Sydney NSW 2000 Mail: GPO Box 33, Sydney, NSW 2001 Email: schoolinfrastructure@det.nsw.edu.au	Compliant		
A23aviii	(viii) a complaints register, updated monthly;	https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/i/john-palmer-public-school/2023/june/JPPS_Project_Update_JUNE_-_FINAL.pdf	The complaints register for March 2024 uploaded. The register contains all monthly complaints.	Compliant		
A23aix	(ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;	https://www.schoolinfrastructure.nsw.gov.au/projects/i/john-palmer-public-school-upgrade.html#category-reports	Copies of the audit report and Applicants response to Audit 3 have been uploaded.	Compliant		
A23ax	(x) any other matter required by the Planning Secretary; and		All requests for documents to be uploaded to the project website have been met.	Compliant		
A23b	(b) keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.	https://www.schoolinfrastructure.nsw.gov.au/projects/i/john-palmer-public-school-upgrade.html#category-reports	Current versions of documents available.	Compliant		
A24	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.		Addressed in previous construction audits.	Not triggered		
A25	The Planning Secretary must be notified through the major projects portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.	JPPS - Incident Report Register	No environmental incidents registered during the audit period.	Not triggered		
A26	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.	Incident report/s	No environmental incidents registered during the audit period.	Not triggered		
A27	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	DE correspondence to PS (DOC23/1642884): Notification of Non-Compliances in accordance with Conditions A27 and A28 for information (10/10/2023)	The Applicant was notified of non-compliances identified in Audit 3 on the 09/10/2023. Notification was submitted to DPE on the 10/10/2023, compliant with the 7 days.	Compliant		
A28	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.	DE correspondence to PS (DOC23/1642884): Notification of Non-Compliances in accordance with Conditions A27 and A28 for information (10/10/2023)	Relevant information included in the notification.	Compliant		
A29	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.		Noted.	Not triggered		
A30	Within three months of:			Compliant		

A30a	(a) the submission of a compliance report under condition A33;			Not triggered		
A30b	(b) the submission of an incident report under condition A26;	Incident reports Management Plans, strategies, etc. Submission documentation	No incidents reported during the audit period.	Not triggered		
A30c	(c) the submission of an Independent Audit under condition C35 or C36;	Letter DE to PS (DOC23/1644339): Condition of Consent A30 – Project Review of Strategies, Plans and Programs (02/11/2023)	Submission of the second Independent Audit to the Department on 02/11/2023. PS and Certifier were notified of plan reviews on the 02/11/2023. No plan updates were required in response to Audit 3 recommendations and improvement opportunities.	Compliant		
A30d	(d) the approval of any modification of the conditions of this consent; or	Modifications https://www.planningportal.nsw.gov.au/major-projects/projects/upgrades-john-palmer-public-school	No modifications have been approved for SSD-23330227.	Not triggered		
A30e	(e) the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	PS directions	No PS directions in relation to this condition received.	Not triggered		
A31	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) within six weeks of the review. <i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>		Noted. Currently all relevant plans are being submitted to the Certifier.	Not triggered		
A32	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (CRPAR).	Compliance Report/s	CRPAR requires reports at intervals of no greater than 52 weeks from the date of commencement of operation (annually).	Not triggered		
A33	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements, unless otherwise agreed by the Planning Secretary.	Compliance Report/s	CRPAR requires reports at intervals of no greater than 52 weeks from the date of commencement of operation (annually).	Not triggered		
A34	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	Compliance Report/s	CRPAR requires reports at intervals of no greater than 52 weeks from the date of commencement of operation (annually).	Not triggered		
A35	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements, 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	Compliance Report/s	CRPAR requires reports at intervals of no greater than 52 weeks from the date of commencement of operation (annually).	Not triggered		
B1	Prior to commencement of construction, the architectural drawings and landscape plans referenced in Condition A2 (as relevant) must be amended and submitted to and approved by the Planning Secretary. The amended plans must meet the following requirements:		Addressed in previous construction audits.	Not triggered		
B1a	(a) to improve pedestrian site lines, a splay must be provided to the north-eastern boundary of the site with The Ponds Shopping Centre by removing some fencing and landscaping along the Ponds Boulevard frontage of the site;		Addressed in previous construction audits.	Not triggered		

B1b	(b) batters must not exceed a grade of 1V:5H and must be stabilized with topsoil, turf and vegetation;		Addressed in previous construction audits.	Not triggered		
B1c	(c) finished levels of all internal works at the road boundary of the property must be 4% above the top of the adjacent kerb; and		Addressed in previous construction audits.	Not triggered		
B1d	(d) provide additional on-site staff car parking within or close proximity to the existing staff carpark unless it is demonstrated to not be feasible under condition B2.		Addressed in previous construction audits.	Not triggered		
B2	If additional on-site staff car parking required under condition B1 is not feasible, evidence must be submitted to the satisfaction of the Planning Secretary demonstrating that additional car parking would:		Addressed in previous construction audits.	Not triggered		
B2a	(a) reduce the amount of the minimum open space required per student; and/or		Addressed in previous construction audits.	Not triggered		
B2b	(b) result in additional tree removal	DPE Receipt Confirmation (06/07/2022) Correspondence DPE to SINSW (08/07/2022) - Approval	Not applicable.	Not triggered		
B3	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.		Commencement of operation: Stage 1 (Block F refurb - minor scope) - addressed in pervious construction audit.	Not triggered		
B4	If the construction or operation of the development is to be staged, the Planning Secretary must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	DE correspondence to PS (DOC23/1723496): Notification of Commencement of Operation in accordance with Conditions B3 – Stage 4 (Block N) (26/10/2024) DE correspondence to PS (DOC23/1723504): Notification of Commencement of Operation in accordance with Conditions B3 and B4 – Stages 1 and 5 (24/11/2023) DE correspondence to PS (DOC24/75785): Notification of Commencement of Operation in accordance with Conditions B3 and B4 – Stage 6 (25/01/2024)	Commencement of operation: Stage 2 & 3 (Library, Hall, Staff Room) - 06/10/2023. No notification issued (non-compliant) Stage 4 (Building N) - 27/10/2023: notification issued on the 26/10/2024 which states 30/10 (non-compliant). A Project Early Use Certificate was issued by SINSW on the 27/10/2023. Stage 5 (Block D refurb) - 29/11/2023: notification on the 24/11/2024 (compliant) Stage 6 (Misc External Landscaping works following demountables removal) - 30 Jan 2024: notification on the 25/01/2024 (compliant) (Stage 7 - expected July 2024)	Non-compliant	Ensure that the Planning Secretary is notified in writing at least 48 hours before the commencement of operation for Stage 7.	A4_NC03
B5	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.		Addressed in previous construction audits.	Not triggered		
B6	Prior to the commencement of construction, the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the BCA. The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.		Addressed in previous construction audits.	Not triggered		
B7	Prior to the commencement of construction, the Applicant must:		Addressed in previous construction audits.	Not triggered		
B7a	(a) consult with the relevant owner and provider of services and Infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;		Addressed in previous construction audits.	Not triggered		
B7b	(b) prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non-residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected;		Addressed in previous construction audits.	Not triggered		

B7c	(c) submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and		Addressed in previous construction audits.	Not triggered		
B7d	(d) provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested.		Addressed in previous construction audits.	Not triggered		
B8	Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of residential and commercial buildings that are likely to be impacted by the development.		Addressed in previous construction audits.	Not triggered		
B9	Where the offer for a pre-construction survey is accepted (as required by condition B8), the Applicant must arrange for a survey to be undertaken by a suitably qualified and experienced expert prior to the commencement of vibration generating works that could impact on the identified buildings.		Addressed in previous construction audits.	Not triggered		
B10	Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by condition B9 the Applicant must:		Addressed in previous construction audits.	Not triggered		
B10a	(a) provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report;		Addressed in previous construction audits.	Not triggered		
B10b	(b) submit a copy of the Pre-Construction Survey Report to the Certifier; and		Addressed in previous construction audits.	Not triggered		
B10c	(c) provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.		Addressed in previous construction audits.	Not triggered		
B11	No later than 48 hours before the commencement of construction, a Community Communication Strategy must be submitted to the Planning Secretary for information. The Community Communication Strategy must provide mechanisms to facilitate communication between the Applicant, the relevant Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction. <i>The Community Communication Strategy must:</i>	Community Communication Strategy (Rev 3, 08/08/2022) Submission to Secretary Communication: SSD-23330227-PA-3 confirmation of the receipt of the CCS by Planning Secretary (16/08/2022)	The Applicant submitted the Community Communication Strategy (CCS) to the Planning Secretary on the 6/12/2022, more than 48 hours prior to the commencement of construction under condition B11 of the project consent scheduled for 11/07/2022. Section 4 and Table 4 detail the engagement approach to be followed for the project construction and a minimum of 12 months following the completion of construction. The CCS is still being implemented. No updates since initial approval.	Compliant		
B11a	identify relevant and people to be consulted during the design and construction phases;	CCS	CCS: Section 3 details the project stakeholders.	Compliant		
B11b	(b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development;	CCS	CCS: Sections 4 and 5 outline the procedures and mechanisms for distributing information regarding the development. Section 6.4 outlines the stakeholder and community notification process for the project.	Compliant		
B11c	(c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development;	CCS	CCS: Section 4 outlines the Project Reference Group (PRG) that acts as a consultative forum the planning and delivery of the project. PRG includes a member of the school community as nominated by the school Principal.	Compliant		
B11d	(d) set out procedures and mechanisms:	CCS	CCS: Sections 4 and 6.5 provide procedures and mechanisms.	Compliant		
B11di	(i) through which the community can discuss or provide feedback to the Applicant;	CCS	CCS: Sections 4 and 6.5 provide procedures and mechanisms.	Compliant		
B11dii	(ii) through which the Applicant will respond to enquiries or feedback from the community; and	CCS	CCS: Sections 4 and 6.5 provide procedures and mechanisms.	Compliant		
B11diii	(iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation.	CCS	CCS: Sections 4 and 6.5 provide procedures and mechanisms.	Compliant		
B12	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either:		Addressed in previous construction audits.	Not triggered		

B12a	(a) registering for a minimum 4 star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifier; or		Addressed in previous construction audits.	Not triggered		
B12b	(b) seeking approval from the Planning Secretary for an alternative certification process.		Addressed in previous construction audits.	Not triggered		
B13	Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifier that all outdoor lighting to be installed within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.		Addressed in previous construction audits.	Not triggered		
B14	Prior to the commencement of construction, demolition work plans required by AS 2601-2001 The demolition of structures (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier and Planning Secretary.		Addressed in previous construction audits.	Not triggered		
B15	Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). Notes: • The Environmental Management Plan Guideline is available on the Planning Portal at: https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval • The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020) Secretary waivers CEMP and sub-plans	As relevant, operational plans were reviewed against the Guideline and generally met the requirements.	Compliant		
B16	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following:		Addressed in previous construction audits.	Not triggered		
B16a	(a) Details of:	CEMP (Rev 3, 29/07/2022)	Addressed in previous construction audits.	Not triggered		
B16ai	(i) hours of work;	CEMP (Rev 3, 29/07/2022)	Addressed in previous construction audits.	Not triggered		
B16aii	(ii) 24-hour contact details of site manager;	CEMP (Rev 6, 16/09/2022)	Addressed in previous construction audits.	Not triggered		
B16aiii	(iii) management of dust and odour to protect the amenity of the neighbourhood;	CEMP (Rev 3, 29/07/2022)	Addressed in previous construction audits.	Not triggered		
B16aiv	(iv) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	CEMP (Rev 3, 29/07/2022) CEMP (Rev 4, 16/09/2022)	Addressed in previous construction audits.	Not triggered		
B16av	(v) community consultation and complaints handling as set out in the Community Communication Strategy required by condition B11;		Addressed in previous construction audits.	Not triggered		
B16b	(b) an unexpected finds protocol for contamination and associated communications procedure to ensure that potentially contaminated material is appropriately managed;		Addressed in previous construction audits.	Not triggered		
B16c	(c) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;		Addressed in previous construction audits.	Not triggered		
B16d	(d) Construction Traffic and Pedestrian Management Sub-Plan (see condition B17);		Addressed in previous construction audits.	Not triggered		
B16e	(e) Construction Noise and Vibration Management Sub-Plan (see condition B18);		Addressed in previous construction audits.	Not triggered		

B16f	(f) Construction Waste Management Sub-Plan (see condition B19);		Addressed in previous construction audits.	Not triggered		
B16g	(g) Construction Soil and Water Management Sub-Plan (see condition B20);		Addressed in previous construction audits.	Not triggered		
B16h	(h) Biodiversity Management Sub-Plan (see condition B21); and		Addressed in previous construction audits.	Not triggered		
B16i	(i) Flood Emergency Response (see condition B22).		Addressed in previous construction audits.	Not triggered		
B17	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:		Addressed in previous construction audits.	Not triggered		
B17a	(a) be prepared by a suitably qualified and experienced person(s);		Addressed in previous construction audits.	Not triggered		
B17b	(b) be prepared in consultation with Council and TfNSW;		Addressed in previous construction audits.	Not triggered		
B17c	(c) detail:		Addressed in previous construction audits.	Not triggered		
B17ci	(i) measures to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services;		Addressed in previous construction audits.	Not triggered		
B17cii	(ii) measures to ensure the safety of vehicles and pedestrians accessing adjoining properties where shared vehicle and pedestrian access occurs;		Addressed in previous construction audits.	Not triggered		
B17ciii	(iii) heavy vehicle routes, access and parking arrangements;		Addressed in previous construction audits.	Not triggered		
B17civ	(iv) the swept path of the longest construction vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, in accordance with the latest version of AS 2890.2; and		Addressed in previous construction audits.	Not triggered		
B17cv	(v) arrangements to ensure that construction vehicles enter and leave the site in a forward direction unless in specific exceptional circumstances under the supervision of accredited traffic controller(s).		Addressed in previous construction audits.	Not triggered		
B18	The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:		Addressed in previous construction audits.	Not triggered		
B18a	(a) be prepared by a suitably qualified and experienced noise expert;		Addressed in previous construction audits.	Not triggered		
B18b	(b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);		Addressed in previous construction audits.	Not triggered		
B18c	(c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;		Addressed in previous construction audits.	Not triggered		
B18d	(d) include strategies that have been developed with the community for managing high noise generating works;		Addressed in previous construction audits.	Not triggered		
B18e	(e) describe the community consultation undertaken to develop the strategies in condition B18(d);		Addressed in previous construction audits.	Not triggered		
B18f	(f) include a complaints management system that would be implemented for the duration of the construction; and		Addressed in previous construction audits.	Not triggered		
B18g	(g) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures in accordance with the requirements of condition B15.		Addressed in previous construction audits.	Not triggered		
B19	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following:		Addressed in previous construction audits.	Not triggered		
B19a	(a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use for materials to remain; and		Addressed in previous construction audits.	Not triggered		

B19b	(b) information regarding the recycling and disposal locations.		Addressed in previous construction audits.	Not triggered		
B20	The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMSP) and the plan must address, but not be limited to the following:		Addressed in previous construction audits.	Not triggered		
B20a	(a) be prepared by a suitably qualified expert, in consultation with Council;		Addressed in previous construction audits.	Not triggered		
B20b	(b) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;		Addressed in previous construction audits.	Not triggered		
B20c	(c) describe all erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book' and Council's Soil Erosion and Sediment Control Policy;		Addressed in previous construction audits.	Not triggered		
B20d	(d) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site);		Addressed in previous construction audits.	Not triggered		
B20e	(e) detail all off-site flows from the site; and		Addressed in previous construction audits.	Not triggered		
B20f	(f) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 5-year ARI and 1 in 100-year ARI.		Addressed in previous construction audits.	Not triggered		
B21	The Biodiversity Management Sub-Plan (BMSP) must address, but not be limited to, the following:		Addressed in previous construction audits.	Not triggered		
B21a	(a) be prepared by a suitably qualified and experienced person/s;		Addressed in previous construction audits.	Not triggered		
B21b	(b) identify areas of land where impacts on biodiversity are to be avoided as outlined in the John Palmer Public School Biodiversity Development Assessment Report prepared by Kleinfelder and dated 12 October 2021 and set out how these areas will be protected from construction impacts; and		Addressed in previous construction audits.	Not triggered		
B21c	(c) set out the measures identified in the Biodiversity Development Assessment Report to minimise, mitigate and manage impacts on biodiversity, including timing and responsibility for delivery of the measures.	BMSP Biodiversity Development Assessment Report (BDAR) Biodiversity Management Sub-Plan (Kleinfelder, Rev 2.0 4/7/2022) - CEMP (Rev 4) Appendix 6.10	Addressed in previous construction audits.	Not triggered		
B22	The Flood Emergency Response Sub-Plan (FERSP) must address, but not be limited to, the following:		Addressed in previous construction audits.	Not triggered		
B22a	(a) be prepared by a suitably qualified and experienced person(s);		Addressed in previous construction audits.	Not triggered		
B22b	(b) address the provisions of the Floodplain Risk Management Guidelines (EHG);		Addressed in previous construction audits.	Not triggered		
B22c	(c) include details of:		Addressed in previous construction audits.	Not triggered		
B22ci	(i) the flood emergency responses for both construction phases of the development;		Addressed in previous construction audits.	Not triggered		
B22cii	(ii) predicted flood levels (including access roads/access routes potentially used by construction workers);		Addressed in previous construction audits.	Not triggered		
B22ciii	(iii) flood warning time and flood notification;		Addressed in previous construction audits.	Not triggered		
B22civ	(iv) assembly points and evacuation routes;		Addressed in previous construction audits.	Not triggered		
B22cv	(v) evacuation and refuge protocols; and		Addressed in previous construction audits.	Not triggered		
B22cvi	(vi) awareness training for employees and contractors, and users/visitors.		Addressed in previous construction audits.	Not triggered		
B23	A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following:		Addressed in previous construction audits.	Not triggered		
B23a	(a) minimise the impacts of earthworks and construction on the local and regional road network;		Addressed in previous construction audits.	Not triggered		
B23b	(b) minimise conflicts with other road users;		Addressed in previous construction audits.	Not triggered		

B23c	(c) minimise road traffic noise; and		Addressed in previous construction audits.	Not triggered		
B23d	(d) ensure truck drivers use specified routes.		Addressed in previous construction audits.	Not triggered		
B24	Prior to the commencement of construction, the Applicant must provide sufficient parking facilities on-site, including for heavy vehicles to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.		Addressed in previous construction audits.	Not triggered		
B25	Prior to the commencement of construction, the Applicant must submit a Construction Worker Transportation Strategy to the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be provided to the Planning Secretary for information.		Addressed in previous construction audits.	Not triggered		
B26	Prior to the commencement of construction, the Applicant must prepare and implement for the duration of construction:		Addressed in previous construction audits.	Not triggered		
B26a	(a) flood warning and notification procedures for construction workers on site; and		Addressed in previous construction audits.	Not triggered		
B26b	(b) evacuation and refuge protocols		Addressed in previous construction audits.	Not triggered		
B27	Prior to installation of mechanical plant and equipment:		Addressed in previous construction audits.	Not triggered		
B27a	(a) a detailed assessment of mechanical plant and equipment with compliance with the relevant project noise trigger levels as recommended in the John Palmer Public School SSDA Noise and Vibration Impact Assessment dated 24 February 2022 and prepared by AECOM (Document number 60654726-RPNV-01_E) must be undertaken by a suitably qualified person; and		Addressed in previous construction audits.	Not triggered		
B27b	(b) evidence must be submitted to the Certifier that any noise mitigation recommendations identified in the assessment carried out under (a) have been incorporated into the design to ensure the development will not exceed the recommended project noise trigger levels identified in the John Palmer Public School SSDA Noise and Vibration Impact Assessment dated 24 February 2022 and prepared by AECOM (Document number 60654726-RPNV-01_E).		Addressed in previous construction audits.	Not triggered		
B28	Prior to the commencement of construction of waste storage and processing areas, the Applicant must obtain agreement from Council for the design of the operational waste storage area (where waste removal will be undertaken by Council). Where waste removal will be undertaken by a third party, evidence must be provided to the Certifier that the design of the operational waste storage area:		Addressed in previous construction audits.	Not triggered		
B28a	(a) is constructed using solid non-combustible materials;		Addressed in previous construction audits.	Not triggered		
B28b	(b) is designed to ensure the door/gate to the waste storage area is vermin proof and can be openable from both inside and outside the storage area at all times;		Addressed in previous construction audits.	Not triggered		
B28c	(c) includes a cold water supply with a hose through a centralised mixing valve;		Addressed in previous construction audits.	Not triggered		
B28d	(d) is naturally ventilated or an air handling exhaust system must be in place; and		Addressed in previous construction audits.	Not triggered		
B28e	(e) includes signage to clearly describe the types of materials that can be deposited into recycling bins and general garbage bins.		Addressed in previous construction audits.	Not triggered		

B29	Prior to the commencement of construction of pedestrian infrastructure upgrades, the Applicant must submit plans and specifications to the satisfaction of the relevant roads authority for proposed pedestrian infrastructure upgrade works and provide a copy to the Planning Secretary for information. The works must include the proposed works set out in the EIS as amended in the Response to Submissions, including:	EIS RtS	Approval not formal; still in progress with BCC Engineering and Local Traffic Committee. Not submitted to PS as yet.	Not triggered		
B29a	(a) new footpath connection from the Jetty Street crossing to the existing footpath on the northern side of Jetty Street; and	EIS RtS Email: RCC to BCC RE: John Palmer PS Wombat Crossing (17/08/2023) Email: BCC to RCC RE: John Palmer PS Wombat Crossing (14/09/2023) JPPS Pedestrian Crossing Warrant Assessment Rev 1 (TTW, 17/08/2023) JETTY STREET SITEWORKS PLAN SHEET 1 S220003 JPPS-CV-SW-DRW-12-0001 (30/11/2022) JPPS Pedestrian Sight Lines and Fencing Assessment (TTW) (05/03/2024) Notification of Change In Charges (Endeavour Energy, 27/02/2024)	Email 17/08/2023 provision of additional information regarding the proposed crossing on Jetty Street in The Ponds. Attachment 230817 JPPS Pedestrian Crossing Warrant Assessment Rev 1.pdf Email 14/09/2023 <i>No objections to recommendation subject to the following comments addressed and amended plan provided to TfNSW for review:</i> <input type="checkbox"/> <i>Sight line and sight distance assessment is required to be provided to demonstrate that the sight lines for approaching motorists is not restricted by existing trees.</i> <input type="checkbox"/> <i>The location of the new pedestrian entry to the school location opposite to Sail street. This location may encourage pedestrian to cross at the intersection. Pedestrian fencing should be provided to ensure pedestrian crossing at the designated crossing facilities.</i> (JPPS Pedestrian Sight Lines and Fencing Assessment (05/03/2024) submitted to BCC on the 05/03/2024. <input type="checkbox"/> <i>The 40km/h school zone signage and line marking will be affected. The consultant to contact TfNSW with regards to the relocation of the existing 40km/h school zone signage and line marking.</i> Approval not formal; still in progress with BCC Engineering and Local Traffic Committee. Not submitted to PS as yet.	Not triggered		
B29b	(b) reinstatement of the footpath in place of the former service vehicle crossing on the eastern side of The Ponds Boulevard. Notes: • <i>Approval must be obtained for roadworks under section 138 of the Roads Act 1993.</i> • <i>All costs associated with the proposed road/pedestrian upgrade works must be borne by the Applicant.</i> • <i>In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent.</i>	Staging Report	Waiting on BCC approval. To be finalised prior to Stage 7, in accordance with the Staging Report.	Not triggered		

B30	<p>Prior to the commencement of construction of the new wombat pedestrian crossing on Jetty Street, east of Sail Street, the Applicant must submit plans and specifications to the satisfaction of the relevant roads authority and undertake Council's Local Traffic Committee process, for the pedestrian crossing and provide a copy to the Planning Secretary for information.</p> <p><i>Note:</i></p> <ul style="list-style-type: none"> • Approval must be obtained for roadworks under section 138 of the Roads Act 1993. • All costs associated with the proposed road/pedestrian upgrade works must be borne by the Applicant. • In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent. 	As above	As for B29(a) above.	Not triggered		
B31	Prior to the commencement of construction of operational parking and access facilities, evidence of compliance of the design of operational parking and access arrangements with the following requirements must be submitted to the Certifier:		Addressed in previous construction audits.	Not triggered		
B31a	(a) a minimum of 35 on-site car parking spaces, plus the additional spaces required under condition B1 (unless otherwise approved by the Planning Secretary under condition B2), for use during operation of the development and designed in accordance with the latest versions of AS 2890.1 and AS 2890.6; and		Addressed in previous construction audits.	Not triggered		
B31b	(b) the swept path of the largest service vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the site, must be in accordance with the latest version of AS 2890.2.		Addressed in previous construction audits.	Not triggered		
B32	Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifier 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 Certifier.	<p>EIS RtS Email: RCC to BCC RE: John Palmer PS Wombat Crossing (17/08/2023) Email: BCC to RCC RE: John Palmer PS Wombat Crossing (14/09/2023) JPPS Pedestrian Crossing Warrant Assessment Rev 1 (TTW, 17/08/2023) JETTY STREET SITEWORKS PLAN SHEET 1 S220003 JPPS-CV-SW-DRAW-12-0001 (30/11/2022) JPPS Pedestrian Sight Lines and Fencing Assessment (TTW) (05/03/2024) Notification of Change In Charges (Endeavour Energy, 27/02/2024)</p>	As above for C29 and C30.	Not triggered		
C1	Site notice(s) must be prominently displayed at the boundaries of the site during construction for the purpose of informing the public of project details and must satisfy the following requirements:		Addressed in previous construction audits.	Not triggered		
C1a	(a) minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size;		Addressed in previous construction audits.	Not triggered		
C1b	(b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period;		Addressed in previous construction audits.	Not triggered		

C1c	(c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice(s); and		Addressed in previous construction audits.	Not triggered		
C1d	(d) the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted.		Addressed in previous construction audits.	Not triggered		
C2	All construction plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner.		Addressed in previous construction audits.	Not triggered		
C3	Demolition work must comply with the demolition work plans required by Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001) and endorsed by a suitably qualified person as required by condition B14.	JPPS - Demolition Plan (Bare Demolition Rev 1, undated) (inc. statement of compliance) Demolition Works Plan Drawings Site visit	Demolition undertaken in accordance with the Demolition Plans and AS 2601-2001.	Compliant		
C4	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:		Addressed in previous construction audits.	Not triggered		
C4a	(a) between 7am and 6pm, Mondays to Fridays inclusive; and		Addressed in previous construction audits.	Not triggered		
C4b	(b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays.		Addressed in previous construction audits.	Not triggered		
C5	Notwithstanding condition C4, provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours:		Addressed in previous construction audits.	Not triggered		
C5a	(a) between 6pm and 7pm, Mondays to Fridays inclusive; and		Addressed in previous construction audits.	Not triggered		
C5b	(b) between 1pm and 4pm, Saturdays.		Addressed in previous construction audits.	Not triggered		
C6	Construction activities may be undertaken outside of the hours in condition C4 if required:		Addressed in previous construction audits.	Not triggered		
C6a	(a) by the Police or a public authority for the delivery of vehicles, plant or materials; or		Addressed in previous construction audits.	Not triggered		
C6b	(b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or		Addressed in previous construction audits.	Not triggered		
C6c	(c) where the works are inaudible at the nearest sensitive receivers; or		Addressed in previous construction audits.	Not triggered		
C6d	(d) for the delivery, set-up and removal of construction cranes, where notice of the crane-related works is provided to the Planning Secretary and affected residents at least seven days prior to the works; or		Addressed in previous construction audits.	Not triggered		
C6e	(e) where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works.		Addressed in previous construction audits.	Not triggered		
C7	Notification of such construction activities as referenced in condition C6 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.		Addressed in previous construction audits.	Not triggered		
C8	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:		Addressed in previous construction audits.	Not triggered		
C8a	(a) 9am to 12pm, Monday to Friday;		Addressed in previous construction audits.	Not triggered		
C8b	(b) 2pm to 5pm Monday to Friday; and		Addressed in previous construction audits.	Not triggered		
C8c	(c) 9am to 12pm, Saturday.		Addressed in previous construction audits.	Not triggered		
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).		Addressed in previous construction audits.	Not triggered		

C10	All construction vehicles (excluding site personnel vehicles) are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site or an approved on-street work zone before stopping.		Addressed in previous construction audits.	Not triggered		
C11	The following hoarding requirements must be complied with:		Addressed in previous construction audits.	Not triggered		
C11a	(a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and		Addressed in previous construction audits.	Not triggered		
C11b	(b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application.		Addressed in previous construction audits.	Not triggered		
C12	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances.		Addressed in previous construction audits.	Not triggered		
C13	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.		Addressed in previous construction audits.	Not triggered		
C14	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential and commercial precincts outside of the construction hours of work outlined under condition C4.		Addressed in previous construction audits.	Not triggered		
C15	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' to ensure noise impacts on surrounding noise sensitive receivers are minimised.		Addressed in previous construction audits.	Not triggered		
C16	Vibration caused by construction at any residence or structure outside the site must be limited to:		Addressed in previous construction audits.	Not triggered		
C16a	(a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and		Addressed in previous construction audits.	Not triggered		
C16b	(b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time).		Addressed in previous construction audits.	Not triggered		
C17	Vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C16.		Addressed in previous construction audits.	Not triggered		
C18	The limits in conditions C16 and C17 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B18 of this consent.		Addressed in previous construction audits.	Not triggered		
C19	For the duration of the construction works:		Addressed in previous construction audits.	Not triggered		
C19a	(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;		Addressed in previous construction audits.	Not triggered		

C19b	(b) all street trees immediately adjacent to the property boundary must be protected at all times during construction in accordance with Council's tree protection requirements. Any street tree, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council;		Addressed in previous construction audits.	Not triggered		
C19c	(c) all trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the John Palmer Primary School Arboricultural Impact Assessment, version 4 dated 12 October 2021; and		Addressed in previous construction audits.	Not triggered		
C19d	(d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.	Inspection of Tree Protection Measures (McArdle, 07/09/2023) MEET-154523 TPZ fencing removal (07/12/2023)	TPZs were removed during the audit period with works being carried out under the supervision of a qualified arborist (Jim McArdle). Toolbox talk delivered prior to removal.	Compliant		
C20	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.		Addressed in previous construction audits.	Not triggered		
C21	During construction, the Applicant must ensure that:		Addressed in previous construction audits.	Not triggered		
C21a	(a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust;		Addressed in previous construction audits.	Not triggered		
C21b	(b) all trucks entering or leaving the site with loads have their loads covered;		Addressed in previous construction audits.	Not triggered		
C21c	(c) trucks associated with the development do not track dirt onto the public road network;		Addressed in previous construction audits.	Not triggered		
C21d	(d) public roads used by these trucks are kept clean from any dust emissions associated with the project; and		Addressed in previous construction audits.	Not triggered		
C21e	(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.		Addressed in previous construction audits.	Not triggered		
C22	The Applicant must:		Addressed in previous construction audits.	Not triggered		
C22a	(a) ensure that site filling within lot boundaries and compaction is carried out in accordance with Blacktown City Council's "Works Specification – Civil";		Addressed in previous construction audits.	Not triggered		
C22b	(b) ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site;		Addressed in previous construction audits.	Not triggered		
C22c	(c) keep accurate records of the volume and type of fill to be used; and		Addressed in previous construction audits.	Not triggered		
C22d	(d) make these records available to the Certifier upon request.		Addressed in previous construction audits.	Not triggered		
C23	Adequate provisions must be made to collect and discharge stormwater drainage during construction to the satisfaction of Certifier. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.		Addressed in previous construction audits.	Not triggered		
C24	The Applicant must prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes, for the duration of construction.		Addressed in previous construction audits.	Not triggered		
C25	Within three months of the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifier. The system must:		Addressed in previous construction audits.	Not triggered		

C25a	(a) be designed by a suitably qualified and experienced person(s);		Addressed in previous construction audits.	Not triggered		
C25b	(b) be generally in accordance with the conceptual design in the EIS;		Addressed in previous construction audits.	Not triggered		
C25c	(c) be in accordance with applicable Australian Standards and the Council requirements; and		Addressed in previous construction audits.	Not triggered		
C25d	(d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines. Note: • Council requirements include: o Blacktown City Council Works Specification – Civil; o Blacktown City Council Engineering Guide for Development; o Blacktown City Council Development Control Plan Part J – Water Sensitive Urban Design and Integrated Water Cycle Management; and o Blacktown City Council WSUD standard drawings A(BS)175M; • Stormwater drainage from the site should be connected into Council's existing drainage system via gravity fed pit and pipe system.		Addressed in previous construction audits.	Not triggered		
C26	In the event that surface disturbance identifies a new Aboriginal object:		Addressed in previous construction audits.	Not triggered		
C26a	(a) all works must halt in the immediate area to prevent any further impacts to the object(s);		Addressed in previous construction audits.	Not triggered		
C26b	(b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects;		Addressed in previous construction audits.	Not triggered		
C26c	(c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS;		Addressed in previous construction audits.	Not triggered		
C26d	(d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and		Addressed in previous construction audits.	Not triggered		
C26e	(e) works may only recommence with the written approval of the Planning Secretary.		Addressed in previous construction audits.	Not triggered		
C27	If any unexpected archaeological relics are uncovered during the work, then:		Addressed in previous construction audits.	Not triggered		
C27a	(a) all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary;		Addressed in previous construction audits.	Not triggered		
C27b	(b) depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW; and		Addressed in previous construction audits.	Not triggered		
C27c	(c) works may only recommence with the written approval of the Planning Secretary.		Addressed in previous construction audits.	Not triggered		
C28	All waste generated during construction must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.		Addressed in previous construction audits.	Not triggered		
C29	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).		Addressed in previous construction audits.	Not triggered		

C30	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.		Addressed in previous construction audits.	Not triggered		
C31	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.		Addressed in previous construction audits.	Not triggered		
C32	The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance with the requirements of the relevant legislation, codes, standards and guidelines.		Addressed in previous construction audits.	Not triggered		
C33	The Applicant must ensure that all external lighting is constructed and maintained in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	INTERIM CROWN OCCUPATION VERIFICATION CERTIFICATE (ICOVC3) (24/11/2023) Electrical, Emergency Lighting, Exit Signs, Outdoor Lighting, Interior Lighting and Section J Installation Certificates (Callan Group, various)	Installation compliance included in ICOVC3.	Compliant		
C34	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.		Addressed in previous construction audits.	Not triggered		
C35	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.	DE correspondence to PS (DOC24/75756): Request for Amendment to Timeframe - Conditions C34 - 39 (Independent Environmental Audit) (16/01/2024)	DOC24/75756: Request from DE to deliver the first operational audit within 26 weeks of Stage 6, rather than Stage 7 due to delays in approval of Stage 7 by Council. No approval received. Audit 4 delivery methodology is in conformance with the IAPAR.	Non-compliant	Ensure compliance with the frequency and timeframe for independent audits, as specified in IAPAR.	A4_NC04
C36	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those agreed to above, upon giving at least 4 week's notice to the Applicant of the date or timing upon which the audit must be commenced.	Secretary directions	No direction issued regarding audit timing.	Not triggered		
C37	In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must:			Compliant		
C37a	(a) review and respond to each Independent Audit Report prepared under condition C35 of this consent, or condition C36 where notice is given;	DE Letter DOC23/1644321: Submission of Independent Audit Report and response in accordance with Condition C37 and C38 (02/11/2023)	The response includes details of proposed actions for non-compliances and improvement opportunities.	Compliant		
C37b	(b) submit the response to the Planning Secretary; and	DE Letter DOC23/1644321: Submission of Independent Audit Report and response in accordance with Condition C37 and C38 (02/11/2023)	The final Independent Audit Report and the proponent's response to audit findings must be submitted to the Department within 2 months of undertaking the independent audit site inspection. The site audit was conducted on the 21/09/2023, and the submission to the PS on the 02/11/2023 was within the 2 month requirement.	Compliant		
C37c	(c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary.	https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/john-palmer-public-school	The Independent Audit Report made publicly available within 60 days after submission to the PS on the 02/11/2023.	Compliant		
C38	Independent Audit Reports and the applicant/proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements unless otherwise agreed by the Planning Secretary.	DE Letter DOC23/1644321: Submission of Independent Audit Report and response in accordance with Condition C37 and C38 (02/11/2023)	The audit was conducted on the 21/09/2023, and the submission to the PS on the 02/11/2023 was within the 2 month requirement.	Compliant		
C39	Notwithstanding the requirements of the Independent Audit Post Approval Requirements, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.		Not triggered	Not triggered		

C40	Operational readiness work must not commence on site until the following details have been submitted to the Certifier:	OC 1,2, 3	Not triggered as no partial handovers of works areas; full OC for the works area had been received prior to handover	Compliant		
C40a	(a) a plan and description of the area(s) of the site to be used for operational readiness work (including pedestrian access) and areas still under construction (including construction access);	Operational readiness work details	Not triggered as no partial handovers of works areas; full OC for the works area had been received prior to handover	Compliant		
C40b	(b) the maximum number of staff to be involved in operational readiness work on site at any one time;	Operational readiness work details	Not triggered as no partial handovers of works areas; full OC for the works area had been received prior to handover	Compliant		
C40c	(c) arrangements to ensure the safety of school staff on the site, including how:	Operational readiness work details	Not triggered as no partial handovers of works areas; full OC for the works area had been received prior to handover	Compliant		
C40ci	(i) areas to be used for operational readiness work will be clearly and securely separated from the areas of the site still under construction;	Operational readiness work details	Not triggered as no partial handovers of works areas; full OC for the works area had been received prior to handover	Compliant		
C40cii	(ii) pedestrian access to and within the site will be managed to ensure no conflict with construction vehicle movements; and	Operational readiness work details	Not triggered as no partial handovers of works areas; full OC for the works area had been received prior to handover	Compliant		
C40d	(d) access and parking arrangements to minimise impacts on the surrounding street network having regard to number of staff involved in operational readiness work on site at any one time and parking arrangements for construction workers on site.	Operational readiness work details	Not triggered as no partial handovers of works areas; full OC for the works area had been received prior to handover	Compliant		
C41	Operational readiness work must only be undertaken in accordance with the details submitted under condition C40 and the following requirements:	Operational readiness work details	Not triggered as no partial handovers of works areas; full OC for the works area had been received prior to handover	Compliant		
C41a	(a) no more than 15 staff are involved in operational readiness work;	Operational readiness work details	No evidence of operational readiness documentation meeting the requirements being submitted to the Certifier.	Compliant		
C41b	(b) no more than five vehicles must access the school related to the operational readiness work;	Operational readiness work details	No evidence of operational readiness documentation meeting the requirements being submitted to the Certifier.	Compliant		
C41c	(c) no students or parents are permitted; and	Operational readiness work details	No evidence of operational readiness documentation meeting the requirements being submitted to the Certifier.	Compliant		
C41d	(d) the Applicant has implemented appropriate arrangements to ensure the safety of school staff.	Operational readiness work details	No evidence of operational readiness documentation meeting the requirements being submitted to the Certifier.	Compliant		
D1	At least one month before commencement of operation, the date of commencement of the operation of the development must be notified to the Planning Secretary in writing. If the operation of the development is to be staged, the Planning Secretary must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Correspondence DE DOC23/1338185: John Palmer Public School (SSD-23330227): Notification of Occupation in accordance with Condition D1 (14/08/2023) Correspondence DE DOC23/1613287: John Palmer Public School (SSD-23330227): Notification of Occupation in accordance with Condition D1 - Revised Stage 4 Operational Commencement Date (04/10/2023) Correspondence DE DOC23/1614751: John Palmer Public School (SSD-23330227): Notification of Occupation in accordance with Condition D1 (04/10/2023) Correspondence DE DOC23/1799432: John Palmer Public School (SSD-23330227): Notification of Occupation in accordance with Condition D1 - Revised Dates (Stages 1, 5, 6, 7) (09/11/2023)	Commencement of operation: Stage 2 and 3 (Library, Hall, Staff Room) - 06/10/2023. Notification issued on the 14/08/2024 (compliant) Stage 4 (Building N) - 27/10/2023: Notification on the 04/10/2024 (non-compliant). Stage 5 (Block D refurb) - 29/11/2023: notification on the 04/10/2024 and updated 09/11/2024 (non-compliant) Stage 6 (Misc External Landscaping works following demountables removal) - 30/01/2024: notification on the 04/10/2024 and updated 09/11/2024 (compliant) (Stage 7 - expected July 2024)	Non-compliant	Ensure that the Planning Secretary is notified in writing at least one month prior to the commencement of operation of Stage 7.	A4_NC05
D2	Prior to commencement of operation, the Applicant must provide the Certifier with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.		Addressed in previous construction audits.	Compliant		

D3	The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	DE correspondence DOC23/1537184: John Palmer Public School (SSD-23330227): Notification of External Walls & Cladding in accordance with Condition D3 (21/09/2023) Crown Occupation Verification Certificate Requirements List R01 (15/09/2023)	Certifier signed off on the products and systems used on the 13/09/2023. Issued to the PS on the 21/09/2023. DPIE RFI: provide a copy of the evidence given to the Certifier which documents that the products and systems used comply with the requirements of the BCA to the Planning Secretary in line with conditions D2 and D3. Relevant documents provided on the 29/09/2023	Compliant		
D4	Prior to the commencement of operation, works-as-executed (WAE) plans signed by a registered engineer or registered surveyor must be submitted to the certifiers. All engineering WAE plans must be prepared on a copy of the original, stamped construction plans for engineering works.	Staging Report	In progress. To be submitted for Stage 7, in accordance with the Staging Report.	Not triggered		
D5	Prior to the commencement of operation, a certificate/s from a registered engineer must be obtained and submitted to Council verifying that the constructed stormwater quality control system and stormwater conservation system will function effectively in accordance with Blacktown City Council Development Control Plan Part J – Water Sensitive Urban Design and Integrated Water Cycle Management.	Staging Report	The certificate/s from a registered engineer had not been obtained at the time of the audit, however, the Staging Report states: One Survey/Certs/WAE drawings to be issued following completion of Stage 6 to capture all works within the boundary.	Non-compliant	Obtain a certificate/s from a registered engineer verifying that the constructed stormwater quality control system and stormwater conservation system will function effectively in accordance with Blacktown City Council Development Control Plan Part J – Water Sensitive Urban Design and Integrated Water Cycle Management, and submit to Council as soon as possible.	A4_NC06
D6	Prior to commencement of operation, a certificate from a registered engineer must be lodged with Council verifying that the structures associated with the rainwater tank and stormwater treatment system(s) have been constructed to withstand all loads likely to be imposed during the lifetime of the structures.	Staging Report	The certificate/s from a registered engineer had not been obtained at the time of the audit, however, the Staging Report states: One Survey/Certs/WAE drawings to be issued following completion of Stage 6 to capture all works within the boundary.	Non-compliant	Obtain a certificate/s from a registered engineer verifying that the structures associated with the rainwater tank and stormwater treatment system(s) have been constructed to withstand all loads likely to be imposed during the lifetime of the structures, and submit to Council as soon as possible.	A4_NC07
D7	The installation of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 1 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires' Disease.	Install Compliance Certificate Stage 2 – Block B hall refurbishment / Block B New Library (Doolan Plumbing, 11/09/2023) INTERIM CROWN OCCUPATION VERIFICATION CERTIFICATE (ICOVC3) (24/11/2023)	Included in IOCOV3	Compliant		
D8	Prior to the commencement of operation, the Applicant must submit evidence from a suitably qualified practitioner to the Certifier that demonstrates that installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers and:	Installation Certificate - Electrical (Calan Group, 24/08/2023) confirms compliance with AS 4282 Email: Philip Chun to RCC Re: JPPS Install Certificates (05/09/2023) INTERIM CROWN OCCUPATION VERIFICATION CERTIFICATE (ICOVC3) (24/11/2023)	The Installation Certificate confirms compliance with AS 4282 for the Construction of new 3 storey school building, Library, Hall extension/ refurbishment and refurbishment works throughout existing site. Certificate was provided to the Certifier on the 25/08/2023 and included in Included in IOCOV3.	Compliant		
D8a	(a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and	Installation Certificate - Electrical (Calan Group, 24/08/2023) confirms compliance with AS 4283	The Installation Certificate confirms compliance with AS 4282 for the Construction of new 3 storey school building, Library, Hall extension/ refurbishment and refurbishment works throughout existing site.	Compliant		
D8b	(b) has been mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	Installation Certificate - Electrical (Calan Group, 24/08/2023) confirms compliance with AS 4284	The Installation Certificate confirms compliance with AS 4282 for the Construction of new 3 storey school building, Library, Hall extension/ refurbishment and refurbishment works throughout existing site.	Compliant		
D9	Prior to commencement of operation, the Applicant must provide evidence to the satisfaction of the Certifier that the installation and performance of the mechanical ventilation systems complies with:		Addressed in previous construction audits.	Not triggered		
D9a	(a) AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and other relevant codes; and		Addressed in previous construction audits.	Not triggered		

D9b	(b) any dispensation granted by Fire and Rescue NSW.		Addressed in previous construction audits.	Not triggered		
D10	Prior to the commencement of operation, the Applicant must submit evidence to the Certifier that the noise mitigation recommendations in the assessment undertaken under condition B27 have been incorporated into the design of mechanical plant and equipment to ensure the development will not exceed the project noise trigger levels identified in the John Palmer Public School SSDA Noise and Vibration Impact Assessment dated 24 February 2022 and prepared by AECOM (Document number 60654726-RPNV-01_E).		Addressed in previous construction audits.	Not triggered		
D11	Prior to commencement of occupation, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety Certificate must be submitted to the relevant authority and Council. The Fire Safety Certificate must be prominently displayed in the building.	Fire Safety Certificate - Building BH, BL & A (06/10/2023) Fire Safety Certificate - Building N (17/10/2023) Fire Safety Certificate - Building D (22/11/2023) ICQVC1-3	Interim FSC issued to Certifier. When the FSC is due for renewal the entire site will be certified and submitted to authority and Council.	Compliant		
D12	Prior to the commencement of occupation of the relevant parts of any new or refurbished buildings, a Structural Inspection Certificate or a Compliance Certificate must be submitted to the Certifier. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the Planning Secretary and the Council after:	Construction Compliance Certificate - Building B – Library & Hall Building (SCP, 19/09/2023) Construction Compliance Certificate Structural Building A – Extension (26/09/2023) Construction Compliance Certificate Structural Building N – (13/10/2023) Construction Compliance Certificate Structural Building D – (16/11/2023) JPPS - Final structural drawings RCC email to BCC: SSD-23330227 - D12 Structural Drawings and Compliance Certs (19/01/2024) Major Projects email: Upgrades to John Palmer Public School - Post Approval Document Received - (SSD-23330227-PA-34) (23/01/2024)	The structural compliance certificates and final drawing were submitted to the Certifier, Council and PS on the 13/11/2023, 19/01/2024 and 23/01/2024, respectively.	Compliant		
D12a	(a) the site has been periodically inspected and the Certifier is satisfied that the structural works is deemed to comply with the final design drawings; and	As above	The Construction Compliance Certificates state that periodic inspections of the structural work during the construction were conducted. Refer to appendix B for a full list of site inspections.	Compliant		
D12b	(b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.	As above	The drawing list is provided in Appendix A of the Construction Compliance Certificates.	Compliant		
D13	Prior to the commencement of operation, the Applicant is to obtain a certificate from a suitably qualified tradesperson, certifying that the kitchen, food storage and food preparation areas have been fitted in accordance with the AS 4674 Design, construction and fit-out of food premises and provide evidence of receipt of the certificate to the satisfaction of the Certifier.	Correspondence: John Palmer Public School – OSHC Kitchenette DA Condition 13- Compliance with Food Code. Food & Beverage Facilities Design DESIGN CERTIFICATE (The Mack Group, 15/09/2023) Email: RCC to Philip Chun Re: JPPS COVC Stage 2 & Stage 3 (15/09/2023)	The Design Certificate confirms that after reviewing the kitchen facility design, it is concluded that it does not require to comply with DA Conditions 13 - Food premises construction (AS4674-2004). Submitted to the Certifier on the 15/09/2023. Included in ICQVC1.	Compliant		
D14	Prior to the commencement of operation, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must:		In progress. Deferred to Stage 7.	Not triggered		
D14a	(a) ascertain whether the construction works created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition B7 of this consent;		In progress. Deferred to Stage 7.	Not triggered		

D14b	(b) have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads).		In progress. Deferred to Stage 7.	Not triggered		
D14c	(c) be submitted to the Certifier;		In progress. Deferred to Stage 7.	Not triggered		
D14d	(d) be forwarded to Council for information; and		In progress. Deferred to Stage 7.	Not triggered		
D14e	(e) be provided to the Planning Secretary when requested.		In progress. Deferred to Stage 7.	Not triggered		
D15	Unless the Applicant and the relevant public authority agree otherwise, the Applicant must:		In progress. Deferred to Stage 7.	Not triggered		
D15a	(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the construction works; and/or		In progress. Deferred to Stage 7.	Not triggered		
D15b	(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development; and/or		In progress. Deferred to Stage 7.	Not triggered		
D15c	(c) pay compensation for the damage as agreed with the owner of the public infrastructure. <i>Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions of this consent.</i>		In progress. Deferred to Stage 7.	Not triggered		
D16	Prior to the commencement of operation, the cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Subject Site as a result of construction works associated with the approved development must be met in full by the Applicant.		In progress. Deferred to Stage 7.	Not triggered		
D17	Where a pre-construction survey has been undertaken in accordance with condition B9, prior to the commencement of operation the Applicant must engage a suitably qualified and experienced expert to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must:	Post-Construction Survey Report	Not applicable - none requested under B9.	Not triggered		
D17a	(a) document the results of the post-construction survey and compare it with the pre-construction survey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition B9;		Not applicable - none requested under B9.	Not triggered		
D17b	(b) be provided to the owner of the relevant buildings surveyed;		Not applicable - none requested under B9.	Not triggered		
D17c	(c) be provided to the Certifier; and		Not applicable - none requested under B9.	Not triggered		
D17d	(d) be provided to the Planning Secretary when requested.		Not applicable - none requested under B9.	Not triggered		
D18	Where the Post-Construction Survey Report determines that damage to the identified property occurred as a result of the construction works, the Applicant must repair, or pay the full costs associated with repairing the damaged buildings, within an agreed timeline between the owner of the identified property and the Planning Secretary. Alternatively, the Applicant may pay compensation for the damage as agreed with the property owner.		Not applicable - none requested under B9.	Not triggered		

D19	<p>Prior to the commencement of operation, the Applicant must complete the pedestrian infrastructure upgrade works approved under condition B29 and B30 to the satisfaction of the relevant roads authority.</p> <p><i>Note:</i></p> <ul style="list-style-type: none"> • Approval must be obtained for roadworks under section 138 of the Roads Act 1993. • All costs associated with the proposed road upgrade works must be borne by the Applicant. • In accordance with section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under section 138 of the Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent. 		In progress. Deferred to Stage 7.	Not triggered		
D20	<p>Prior to the commencement of operation or other timeframe agreed in writing by the Planning Secretary, evidence must be submitted to the Certifier that demonstrates that works associated with the reconfiguration of the existing onsite car park to create 35 car parking spaces (including two accessible spaces) plus the additional spaces required under condition B1 (unless otherwise approved by the Planning Secretary under condition B2) have been completed.</p>	<p>Letter: DPE SSD-23330227-PA-18 Upgrades to John Palmer Public School (SSD-23330227) Staging Report, Conditions A9 and A10 (21/07/2023)</p> <p>Staging Report</p> <p>Site visit</p>	<p>DPE SSD-23330227-PA-18: DPE agree to the proposed time extension to complete the Car Parking Arrangements and Landscaping prior to Stage 6 (November 2023), under conditions D20 and D32 of SSD-23330227. Not delivered for Stage 6, as approved and stated in the Staging Report, and no evidence provided that it has been submitted to the Certifier.</p> <p>35 car spaces (including two accessible spaces) observed during the audit.</p>	Non-compliant	Submit evidence to the Certifier that demonstrates works associated with the reconfiguration of the existing onsite car park to create 35 car parking spaces (including two accessible spaces) have been completed as soon as possible.	A4_NC08
D21	<p>Prior to the commencement of operation, compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the Certifier:</p>	Staging Report	Not delivered prior to commencement of Stage 6 as stated in the Staging Report. No evidence provided that it has been submitted to the Certifier.	Non-compliant	Submit evidence to the Certifier that demonstrates, compliance with the requirements for secure bicycle parking and end-of-trip facilities (following installation of signage required under D21(d)).	A4_NC09
D21a	(a) the provision of a minimum eight staff and 20 additional student bicycle parking spaces;	Site visit	The site visit identified 8 staff and 28 student bicycle spaces.	Compliant		
D21b	(b) the layout, design and security of bicycle facilities must comply with the minimum requirements of the latest version of AS 2890.3:2015 Parking facilities - Bicycle parking, and be located in easy to access, well-lit areas that incorporate passive surveillance;			Compliant		
D21c	(c) the provision of end-of-trip facilities for staff; and	Site visit		Compliant		
D21d	<p>(d) appropriate pedestrian and cyclist advisory signs are to be provided.</p> <p><i>Note: All works/regulatory signposting associated with the proposed development shall be at no cost to the relevant roads authority.</i></p>	Site visit	No signage observed during the site visit.	Non-compliant	Ensure pedestrian and cyclist advisory signs are installed as soon as possible.	
D22	<p>Prior to commencement of operation, school/pedestrian crossings must be installed on surrounding roads in accordance with the relevant design standards and warrants to the satisfaction of the relevant road authority.</p>	Staging Report	In progress. Deferred to Stage 7.	Not triggered		
D23	<p>At least eight weeks prior to the commencement of operation, the Applicant must submit the following details to TfNSW and obtain authorisation to install School Zone signs and associated pavement markings, and / or removal / relocation of any existing Speed Limit signs:</p>		In progress. Deferred to Stage 7.	Not triggered		
D23a	(a) a copy of the conditions of consent;		In progress. Deferred to Stage 7.	Not triggered		
D23b	(b) the proposed school commencement/opening date;		In progress. Deferred to Stage 7.	Not triggered		
D23c	(c) two sets of detailed design plans showing the following:		In progress. Deferred to Stage 7.	Not triggered		
D23ci	(i) accurate Site boundaries;		In progress. Deferred to Stage 7.	Not triggered		
D23cii	(ii) details of all road reserves, adjacent to the Site boundaries;		In progress. Deferred to Stage 7.	Not triggered		

D23ciii	(iii) all proposed access points from the Site to the public road network and any additional conditions imposed/proposed on their use;		In progress. Deferred to Stage 7.	Not triggered		
D23civ	(iv) all existing and proposed pedestrian crossing facilities on the adjacent road network;		In progress. Deferred to Stage 7.	Not triggered		
D23cv	(v) all existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings); and		In progress. Deferred to Stage 7.	Not triggered		
D23cvi	(vi) all existing and proposed street furniture and street trees.		In progress. Deferred to Stage 7.	Not triggered		
D24	Prior to the commencement of operation, all required School Zone signage, speed management signage and associated pavement markings along Jetty Street and The Ponds Boulevard must be installed, inspected by TfNSW and handed over to TfNSW. <i>Note: Any required approvals for altering public road speed limits, design and signage are required to be obtained from the relevant consent authority.</i>		In progress. Deferred to Stage 7.	Not triggered		
D25	The Applicant must maintain records of all dates in relation to installing, altering and removing traffic control devices related to speed.		In progress. Deferred to Stage 7.	Not triggered		
D26	Prior to the commencement of operation, a School Transport Plan (STP), must be submitted to the satisfaction of the Planning Secretary. The plan must:	Staging Report JPPS School Transport Plan (TTW, 23/01/2024) DPHI correspondence SSD-23330227-PA-30: Upgrades to John Palmer Public School (SSD-23330227) School Transport Plan, Condition D26 (25/01/2024)	Submitted on the 23/01/2024 and approved by the PS on the 25/01/2024.	Compliant		
D26a	(a) be prepared by a suitably qualified consultant in consultation with Council and TfNSW;	JPPS School Transport Plan (TTW, 23/01/2024)	Prepared by Michael Babbage of TTW. Covered in Section 1.1 of the STP.	Compliant		
D26b	(b) include arrangements to promote the use of active and sustainable transport modes, including:	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26bi	(i) objectives and modes share targets (i.e. Site and land use specific, measurable and achievable and timeframes for implementation);	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26bii	(ii) specific tools and actions to help achieve the objectives and mode share targets;	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26biii	(iii) details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development.	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26c	(c) include operational transport access management arrangements, including:	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26i	(i) detailed pedestrian analysis including the identification of safe route options to identify the need for management measures such as staggered school start and finish times to ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish;	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26ii	(ii) the location of all car parking spaces on the school campus and their allocation (i.e. staff, visitor, accessible, emergency, etc.);	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26iii	(iii) the location and operational management procedures of the drop-off and pick-up parking, including staff management/traffic controller arrangements;	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26iv	(iv) the location and operational management procedures for the drop-off and pick-up of students by buses and coaches including staff management/traffic controller arrangements;	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		

D26v	(v) delivery and services vehicle and bus access and management arrangements;	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26vi	(vi) management of approved access arrangements;	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26vii	(vii) potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing drop-off and pick-up zones;	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26viii	(viii) car parking arrangements and management associated with the proposed use of school facilities by community members; and	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26d	(d) measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the plan; and	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D26e	(e) a monitoring and review program.	JPPS School Transport Plan (TTW, 23/01/2024)	Addressed in the plan	Compliant		
D27	Prior to commencement of operation, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.	SUBDIVIDER/DEVELOPER COMPLIANCE CERTIFICATE (Sydney Water, 23/08/2023)	Certificate obtained prior to commencement of Stage 6.	Compliant		
D28	Prior to the commencement of operation, an Stormwater Operation and Maintenance Plan (SOMP) is to be submitted to the Certifier. The SOMP must ensure the proposed stormwater quality measures remain effective and contain the following:	Stormwater –Operation and Maintenance Schedule (SCP, 18/12/2023) Email RCC to Certifier: FW: S201075_JPPS-CV-SW-RPT-05_STORMWATER OM (18/03/2024) ICOVC3 (24/11/2023)	Submitted to the certifier on the 18/03/2024, following commencement of Stage 6. Staging Report states Stage 6. No further action required	Non-compliant		A4_NC10
D28a	(a) maintenance schedule of all stormwater quality treatment devices;		Addressed in the SOMP	Compliant		
D28b	(b) record and reporting details;		Addressed in the SOMP	Compliant		
D28c	(c) relevant contact information; and		Addressed in the SOMP	Compliant		
D28d	(d) Work Health and Safety requirements.		Addressed in the SOMP	Compliant		
D29	Prior to the commencement of operation, way-finding signage and signage identifying the location of staff car parking must be installed.	Site visit	No car parking wayfinding identified during the site visit.	Non-compliant	Ensure car parking way-finding is installed as soon as possible.	A4_NC11
D30	Prior to the commencement of operation, bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas.	Site visit	No bicycle wayfinding identified during the site visit.	Non-compliant	Ensure bicycle way-finding is installed as soon as possible.	A4_NC12
D31	Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Certifier. The Waste Management Plan must:	Operational Waste Management Plan (EcCell, 17/07/2023) Staging Report CROWN DESIGN VERIFICATION CERTIFICATE (Philip Chun, 03/05/2023)	The OWMP (Rev1,12/10/21) prepared under the SEARS was submitted to the Certifier for CDVC (03/05/2023) to satisfy condition B28. The final OWMP (Rev2, 17/08/2023) to satisfy D31 was submitted to the Certifier on the 01/05/2024. The Staging Report identifies that the plan should have been submitted prior to the commencement of Stage 6. The OWMP has been based on the CWMP and Section 1 still references the Secretary's Environmental Assessment Requirements (SEARs) specifically Item 17, rather than the SSD conditions. Staging Report notes prior to commencement of Stage 6.	Non-compliant		A4_NC13
D31a	(a) detail the type and quantity of waste to be generated during operation of the development;	OWMP	Section 5	Compliant		
D31b	(b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009);	OWMP	Section 6	Compliant		
D31c	(c) detail the materials to be reused or recycled, either on or off site; and	OWMP	Section 4.2	Compliant		

D31d	(d) include the Management and Mitigation Measures included in the EIS.	OWMP	Sections 4.3, 6 and 7	Compliant		
D32	Prior to the commencement of operation or other timeframe agreed by the Planning Secretary, landscaping of the site must be completed in accordance with landscape plan(s) listed in condition A2(d).	ICOVC3 (Philip Chun, 24/11/2023) Landscape Installation Certificate to Satisfy Condition D32 and D33 (Stone Will, 13/09/23) Defects Report (Jacobs, 05/04/2024) Site audit	The Landscape Installation Certificate was accepted by the certifier in ICOVC3, issued prior to Stage 6. However, the defects report prepared by Jacobs on the 05/04/2024 identified a number of defects including missing trees. This was confirmed during the site visit on the 17/04/2024. The 'Dry Creek Bed' Rip Rap near Learning Circle 1 was observed to contain about 10cm of water, despite no rain on the days prior to the audit. Refer to the photos in Appendix D. This is safety concern as there are only movable barriers in place to prevent access to the area. The area does not appear to have been established as detailed on the approved map.	Non-compliant	Conduct an immediate review of the installation of the 'Dry Creek Bed' Rip Rap near Learning Circle 1 and rectify any deficiencies as soon as possible. Ensure all defects identified in the Jacobs defects report dated 05/04/2024, and as shown in photos in Appendix D, are closed out as soon as possible.	A4_NC14
D33	Prior to the commencement of operation, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping on-site and submit it to the Certifier. The plan must:	Operations & Maintenance Manual Landscape (Stone Will, 25/10/2023)	The plan was prepared prior to Stage 6 commencement however was not submitted to the Certifier on the 18/03/2024, after commencement of Stage 6. No further action required.	Non-compliant		A4_NC15
D33a	(a) describe the ongoing monitoring and maintenance measures to manage revegetation and landscaping; and	Operations & Maintenance Manual Landscape (Stone Will, 25/10/2023)	Stone Will Pty Ltd will maintain the works as per plan for a period of 52 weeks from practical completion of Stage 1. The plan does not include ongoing landscape maintenance, which will be the responsibility of the PPP after the first year.	Compliant	A4_IO1: Update the LMP to include clarification regarding what will happen after the first 12 months, for example, that the plan will be reviewed and revised and the PPP will be responsible for implementation.	
D33b	(b) be consistent with the Applicant's Management and Mitigation Measures at Appendix C in the EIS.		None stated in Appendix C in the EIS.	Not triggered		
D34	Prior the commencement of the operation, a Flood Emergency Management Plan must be submitted to the satisfaction of the Planning Secretary that:	Operational Flood Emergency Management Plan (OFEMP) (Rev 3, 08/11/2023) DE correspondence DOC23/1638512: Submission of Operational Flood Emergency Management Plan in accordance with Condition D34, and evidence of consultation with NSW State Emergency Service in accordance with D35 (09/10/2023) DPE correspondence SSD-23330227-PA-23: Operational Flood Emergency Management Plan and SES Consultation Evidence Conditions D34 and D35 (15/11/2023)	The approved Staging Report, the OFEMP was required to be submitted prior to commencement of Stage 2. The OFEMP was submitted to the Secretary on the 09/10/2023 following the commencement of Stage 2 on the 06/10/2023. No further action required.	Non-compliant		A4_NC16
D34a	(a) is prepared by a suitably qualified and experienced person(s);	OFEMP	Prepared by Derek Yang, SCP Consulting. Bachelor of Engineering (Civil), Member, Institute of Engineers Australia (MIEA), National Engineering Register (NER), Chartered Professional Engineer (CPEng).	Compliant		
D34b	(b) seeks advice from the NSW State Emergency Service, noting the limitations described in the NSW Floodplain Development Manual Appendix N, section N7;	OFEMP SES correspondence ID2109: Flood Emergency Response Plan for John Palmer Public School (05/10/2023)	Consultation with SES and recommendations included in the plan.	Compliant		
D34c	(c) addresses the provisions of the Floodplain Risk Management Guidelines (EHG);	OFEMP	The OFEMP addresses the provisions of the Floodplain Risk Management Guidelines (EHG). Key measures related to preparedness, response and recovery are listed in Table 30 of the Flood Risk Management Guidelines MM01 –Flood Risk Management Measures.	Compliant		
D34d	(d) includes details of:	OFEMP		Compliant		
D34di	(i) the flood emergency responses for operational phase of the development;	OFEMP	OFEMP Section 4	Compliant		
D34dii	(ii) predicted flood levels;	OFEMP	OFEMP Section 3.2	Compliant		
D34diii	(iii) flood warning time and flood notification;	OFEMP	OFEMP Section 4	Compliant		
D34div	(iv) assembly points and evacuation routes;	OFEMP	OFEMP Section 4.1	Compliant		
D34dv	(v) strategies such as early or pre-emptive school closure, evacuation and refuge protocols where relevant; and	OFEMP	OFEMP Section 4.3	Compliant		

D34e	(e) includes details of awareness training for employees, contractors, visitors, students and caregivers.	OFEMP	OFEMP Section 5.1	Compliant		
D35	Evidence of consultation with NSW State Emergency Service in relation to condition D34 including comments made shall be submitted to the Planning Secretary when the Flood Emergency Management Plan is submitted.	OFEMP SES correspondence ID2109: Flood Emergency Response Plan for John Palmer Public School (05/10/2023) DPE correspondence SSD-23330227-PA-23: Operational Flood Emergency Management Plan and SES Consultation Evidence Conditions D34 and D35 (15/11/2023)	Submitted.	Compliant		
E1	Prior to the commencement of the first out of hours events (School Use) run by the school that involve 100 or more people, the Applicant is to prepare an Out of Hours Event Management Plan (School Use) in consultation with Council and submit it to the Council and Planning Secretary for information. The plan must include the following:	Out of Hours Event Management Plan Rev 1 (Jacobs, 14/03/2024) (OHEMP) DE correspondence DOC24/828445: Conditions E1 and E3 (Out of Hours Event Management Plans) (15/04/2024)	OHEMP - Appendix E Evidence of Council Consultation Submitted to the PS on the 15/04/2024.	Compliant		
E1a	(a) the number of attendees, time and duration;	OHMP	Section 2 & Appendix B	Compliant		
E1b	(b) arrival and departure times and modes of transport;	OHMP	Section 2 & Appendix B	Compliant		
E1c	(c) where relevant, a schedule of all annual events;	OHMP	Appendix A	Compliant		
E1d	(d) measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport);	OHMP	Section 3 & Appendix C	Compliant		
E1e	(e) details of the use of the activity(ies), where applicable, restricting use before 8am and after 10pm;	OHMP	Section 2 & Appendix B	Compliant		
E1f	(f) measures to minimise localized traffic and parking impacts; and	OHMP	Section 3 & Appendix C	Compliant		
E1g	(g) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan and ceasing amplified music or sound before 9.30pm.	OHMP	Section 4	Compliant		
E2	The Out of Hours Event Management Plan (School Use) must be implemented by the Applicant for the duration of the identified events or use.		Events have not been initiated under the plan as yet.	Not triggered		
E3	Prior to the commencement of out of hours events (Community Use) run by the external parties that involve 100 or more people, the Applicant is to prepare an Out of Hours Event Management Plan (Community Use) in consultation with Council and submit it to the Council and Planning Secretary for information. The plan must include the following:	Out of Hours Event Management Plan Rev 1 (Jacobs, 14/03/2024) (OHEMP) DE correspondence DOC24/828445: Conditions E1 and E3 (Out of Hours Event Management Plans) (15/04/2024)	OHEMP - Appendix E Evidence of Council Consultation Submitted to the PS on the 15/04/2024.	Compliant		
E3a	(a) the number of attendees, time and duration;	Out of Hours Event Management Plan Rev 1 (Jacobs, 08/03/2024) (OHEMP)	Section 2 & Appendix B	Compliant		
E3b	(b) arrival and departure times and modes of transport;	Out of Hours Event Management Plan Rev 1 (Jacobs, 08/03/2024) (OHEMP)	Section 2 & Appendix B	Compliant		
E3c	(c) where relevant, a schedule of all annual events;	Out of Hours Event Management Plan Rev 1 (Jacobs, 08/03/2024) (OHEMP)	Appendix A	Compliant		
E3d	(d) measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport);	Out of Hours Event Management Plan Rev 1 (Jacobs, 08/03/2024) (OHEMP)	Section 3 & Appendix C	Compliant		
E3e	(e) details of the use of the library, school hall and canteen and Building D, where applicable, restricting use before 8am and after 10pm;	Out of Hours Event Management Plan Rev 1 (Jacobs, 08/03/2024) (OHEMP)	Section 2 & Appendix B	Compliant		
E3f	(f) measures to minimise localised traffic and parking impacts; and	Out of Hours Event Management Plan Rev 1 (Jacobs, 08/03/2024) (OHEMP)	Section 3 & Appendix C	Compliant		
E3g	(g) measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan and ceasing amplified music of sound before 9.30pm.	Out of Hours Event Management Plan Rev 1 (Jacobs, 08/03/2024) (OHEMP)	Section 4	Compliant		

E4	The Out of Hours Event Management Plan (Community Use) must be implemented by the Applicant for the duration of the identified community event or use.		Events have not been initiated under the plan as yet.	Not triggered		
E5	All plant and equipment used on site must be maintained in a proper and efficient condition operated in a proper and efficient manner.	Site visit Handover pack Complaints log	Handover Pack includes all operation and maintenance information for services.	Compliant		
E6	The operation and maintenance of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 2 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings –Microbial control –Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires Disease.	Handover pack	Warm water system only. Included in the Handover Pack (Doolan)	Compliant		
E7	The Community Communication Strategy, as submitted to the Certifier, must be implemented for a minimum of 12 months following the completion of construction.		CSS still being implemented.	Compliant		
E8	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in the John Palmer Public School SSDA Noise and Vibration Impact Assessment dated 24 February 2022 and prepared by AECOM (Document number 60654726-RPNV-01_E).	John Palmer Public School Post Completion Noise Compliance Testing (08/03/2024)	Based on the results of acoustic testing noise levels resulting from the operation of the mechanical equipment on the site are compliant with the projects items E8 and E9 of the projects SSD 23330227 Conditions of Consent.	Compliant		
E9	The Applicant must undertake short term noise monitoring in accordance with the Noise Policy for Industry where valid data is collected following the commencement of use of each stage of the development. The monitoring program must be carried out by an appropriately qualified person and a monitoring report must be submitted to the Planning Secretary within two months of commencement use of each stage of the development or other timeframe agreed to by the Planning Secretary to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in John Palmer Public School SSDA Noise and Vibration Impact Assessment dated 24 February 2022 and prepared by AECOM (Document number 60654726-RPNV-01_E). Should the noise monitoring program identify any exceedance of the recommended noise levels referred to above, the Applicant is required to implement appropriate noise attenuation measures so that operational noise levels do not exceed the recommended noise levels or provide attenuation measures at the affected noise sensitive receivers.	John Palmer Public School Post Completion Noise Compliance Testing (08/03/2024) DPHI correspondence SSD-23330227-PA-37: Operational Noise Monitoring Report, Condition E9 (17/04/2024)	Noise level measurements were conducted in conjunction with the projects conditions of consent including items E8 and E9 of the projects SSD 23330227 Conditions of Consent which includes reference to the SSDA Noise and Vibration Impact Assessment dated 24 February 2022 and prepared by AECOM document number: 60654726RPNV-01_E. Attended compliance noise level measurements were conducted on the 7th of March 2024. Based on the results of acoustic testing noise levels resulting from the operation of the mechanical equipment on the site are compliant with the projects items E8 and E9 of the projects SSD 23330227 Conditions of Consent. Staging Report states Stage 5 and monitoring was submitted to the PS on the 11/03/2024, greater than 2 months following the commencement of Stage 5 on the 29/11/2023. Noise monitoring was not conducted for each stage and no request was made to the Planning Secretary on an alternate timeframe.	Non-compliant	Ensure noise monitoring is conducted in accordance with condition E9 following Stage 7, or prior to the commencement of Stage 7 seek approval from the Planning Secretary that the current noise monitoring is sufficient.	A4_NC17
E10	All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.	Site visit	During the site visit two shipping containers and two 1,110L waste bins were observed obstructing three spaces in the carpark area (refer to photo in Appendix D). Interviews with Jacobs staff identified that these were the responsibility of the PPP.	Non-compliant	Remove the shipping containers and waste bins from the car park and ensure that the PPP and other relevant stakeholders are advised in writing of the requirements of condition E10 and that all driveways, footways and parking areas must be unobstructed at all times.	A4_NC18

E11	The School Transport Plan required by condition D26 of this consent must be updated annually and implemented unless otherwise agreed by the Planning Secretary.		Update not triggered at the time of the first operations audit. The following aspects of the STP were being implemented at the time of the site visit: site access, public transport, pick-up and drop-off, emergency vehicles. Car parking capacity was reduced due shipping containers being stored in three spaces. As the waste bins were not located in the waste storage area at the time of the audit the waste contractors would not be using the access approach described in the plan. Active transport – due to delays to Stage 7 the pre-development options for accessing the school are currently being used. At the time of the audit there was not any evidence available to assess progress towards mode share targets.	Not triggered		
E12	Unless otherwise agreed by the Planning Secretary, within twelve months of commencement of operation, Green Star certification must be obtained demonstrating the development achieves a minimum 4 star Green Star Design & As Built rating. If required to be obtained, evidence of the certification must be provided to the Certifier and the Planning Secretary. If an alternative certification process has been agreed to by the Planning Secretary under condition B12, evidence of compliance of implementation must be provided to the Planning Secretary and Certifier.		Not triggered.	Not triggered		
E13	Notwithstanding condition D8, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide reasonable mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.	Complaints log	No complaints recorded to date.	Not triggered		
E14	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition D33 for the duration of occupation of the development.	Site visit maintenance evidence	The site visit identified that some areas of the site appear to have been maintained better than others. As evident in the photos in Appendix D, dead trees are located throughout the site. The dead trees were also identified in the Jacobs defects report. Limited weeds sighted overall.	Compliant	Refer to A4_IO1.	
App 1 AN1	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	Licences and Approvals	Sydney Water s.73 certificate.	Compliant		
App 1 AN2	For work costing \$25,000 or more, a Long Service Levy must be paid. For further information please contact the Long Service Payments Corporation Helpline on 131 441.		Addressed in previous construction audits.	Not triggered		
App 1 AN3	Any advice or notice to the consent authority must be served on the Planning Secretary.		Generally documents provided to DPE have been via the Major Projects portal. All correspondence is addressed to the Planning Secretary.	Compliant		
App 1 AN4	The works that are the subject of this application must be designed and constructed to provide access and facilities for people with a disability in accordance with the BCA. Prior to the commencement of construction, the Certifier must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.	ICOVC3	Philip Chun certifies that the John Palmer Public School Development (namely Building D and the surrounding areas of Building N) has been constructed generally in accordance with the objectives and requirements of the Building Code of Australia 2019, the NSW Appendix, all applicable Laws and Australian Standards, the Disability (Access to Premises - Buildings) Amendment Standards 2010 and the spirit and intent of the Disability Discrimination Act 1992 (Cth) (DDA).	Compliant		

App 1 AN5	Prior to the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	SW Notice of Requirements for Section 73 Subdivider/Developer Compliance Certificate (Case No. 200205)(15/07/2022) SW: SUBDIVIDER/DEVELOPER COMPLIANCE CERTIFICATE (23/08/2023) Email: DET to SINSW/Jacobs/RCC (13/03/2023) MCR meeting minutes Telstra engagement Letter: Endeavour Energy UUL1968 – CONNECTION OF LOAD APPLICATION 85 THE PONDS BOULEVARD, THE PONDS (15/03/2023)	SW section 73 issued. SW Building Plan Assessment Application approved 10/06/2022. Not necessary for the gas supplier (Jemena). Telstra have been engaged to undertake survey works (13/03/2023). This is ongoing. No approval at time of this audit. Endeavour Energy letter dated 15/03/2023 - Letter to Proceed.	Compliant		
App 1 AN6	Prior to the commencement of above ground works written advice must be obtained from the electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.		Addressed in previous construction audits.	Not triggered		
App 1 AN7	All roads and traffic facilities must be designed to meet the requirements of Council or TfNSW (whichever is applicable). The necessary permits and approvals from the relevant road authority must be obtained prior to the commencement of road or pavement construction works.	Road authority permits	There has not been an application for a Road Authority Permit during the Audit period. Jetty Street footpath and Wombat crossing to be addressed for Stage 7. To be reviewed in the next operations audit.	Not triggered		
App 1 AN8	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	Road Occupancy Licence	There has not been an application for a Road Authority Permit during the Audit period. Jetty Street footpath and Wombat crossing to be addressed for Stage 7. To be reviewed in the next operations audit.	Not triggered		
App 1 AN9	To protect the safety of work personnel and the public, the work site must be adequately secured to prevent access by unauthorised personnel, and work must be conducted at all times in accordance with relevant SafeWork requirements.		Addressed in previous construction audits.	Not triggered		
App 1 AN10	The Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.		Addressed in previous construction audits.	Not triggered		
App 1 AN11	The Applicant must consult with SafeWork NSW concerning the handling of any asbestos waste that may be encountered during construction. The requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 – 'Transportation and management of asbestos waste' must also be complied with.		Addressed in previous construction audits.	Not triggered		
App 1 AN12	The owner must submit to Council an Annual Fire Safety Statement, each 12 months after the final Safety Certificate is issued. The certificate must be on, or to the effect of, Council's Fire Safety Statement.		Not triggered at the time of the first operation audit.	Not triggered		
App 2 1	A written incident notification addressing the requirements set out below must be emailed to the Planning Secretary through the major projects portal within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition A25 or, having given such notification, subsequently forms the view that an incident has not occurred.	JPPS - Incident Report Register	No notifiable incidents during the audit period.	Not triggered		
App 2 2	Written notification of an incident must:	JPPS - Incident Report Register	No notifiable incidents during the audit period.	Not triggered		
App 2 2a	(a) identify the development and application number;		No notifiable incidents during the audit period.	Not triggered		
App 2 2b	(b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);		No notifiable incidents during the audit period.	Not triggered		
App 2 2c	(c) identify how the incident was detected;		No notifiable incidents during the audit period.	Not triggered		
App 2 2d	(d) identify when the applicant became aware of the incident;		No notifiable incidents during the audit period.	Not triggered		

App 2 2e	(e) identify any actual or potential non-compliance with conditions of consent;		No notifiable incidents during the audit period.	Not triggered		
App 2 2f	(f) describe what immediate steps were taken in relation to the incident;		No notifiable incidents during the audit period.	Not triggered		
App 2 2g	(g) identify further action(s) that will be taken in relation to the incident; and		No notifiable incidents during the audit period.	Not triggered		
App 2 2h	(h) identify a project contact for further communication regarding the incident.		No notifiable incidents during the audit period.	Not triggered		
App 2 3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.		No notifiable incidents during the audit period.	Not triggered		
App 2 4	The Incident Report must include:		No notifiable incidents during the audit period.	Not triggered		
App 2 4a	(a) a summary of the incident;		No notifiable incidents during the audit period.	Not triggered		
App 2 4b	(b) outcomes of an incident investigation, including identification of the cause of the incident;		No notifiable incidents during the audit period.	Not triggered		
App 2 4c	(c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and		No notifiable incidents during the audit period.	Not triggered		
App 2 4d	(d) details of any communication with other stakeholders regarding the incident.		No notifiable incidents during the audit period.	Not triggered		

Appendix F. Independent Audit Declaration Form

Independent Audit Declaration Form

Project Name: John Palmer Public School Upgrade

Consent Number: SSD 23330227

Proponent: School Infrastructure NSW

Title of Audit: Independent Audit 4 (Operation)

Date: 30 April 2024

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

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

Notes:

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

Name of Auditor: Denise Day, Master Environmental Auditor

Arcadis

Signature:





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