



Independent Environmental Audit

JORDAN SPRINGS PRIMARY SCHOOL

MARCH 2020

1. REVISIONS

Revision	Date	Report No.	Description	Prepared by	Approved by
1	27/03/20	1817T4190320	Issued to TSA for review and comment	R. Johnson	R. Johnson
2	21/04/20	1817T4190320	Final	R. Johnson	R. Johnson

AUDIT DECLARATION

Project Name	Jordan Springs Primary School
Consent Number	SSD 9354
Description of Project	Construction of a new Public School at Jordan Springs comprising a two-storey library, admin and staff building, two 2-storey learning hubs, single storey assembly hall, sports courts and landscaping, car parking and pick-up and drop-off zones.
Project Address	Lot 22 DP1194338, 14-28 Cullen Avenue, Jordan Springs, NSW
Proponent	NSW Department of Education
Title of Audit	Construction Compliance Audit

I declare that the information provided in, and in connection with, this report is a true and correct representation of the site status as observed during the site audit on 26 February 2020. Additional information requested during the site audit was provided post-audit where available.

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

- the audit has been undertaken in accordance with relevant condition(s) of consent, the Independent Audit Post Approval Requirements (IAPAR, DP&E 2018), and AS/NZS ISO 19011.2014 – Guidelines for Auditing Management Systems;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Lead Auditor: Richard Johnson

Title: Director, Aspect Environmental Pty Limited

Signature:



Date: 21 April 2020

Limitation: This document has been prepared by Aspect Environmental Pty Limited for TSA Management Pty Ltd (acting on behalf of Department of Education NSW). The document and contents are subject to, and issued in accordance with, the provisions of the contract between Aspect Environmental Pty Limited and TSA Management Pty Ltd. Aspect Environmental Pty Limited accepts no liability or responsibility whatsoever for, or in respect of, any use of, or reliance upon, this document by any third party.

EXECUTIVE SUMMARY

Conditions of Consent (CoC) issued for State significant development SSD 9354 (5 September 2019) require, under condition C36, independent audits of the development to be carried out. This independent environmental audit report satisfies that requirement.

The audit has been conducted in accordance with:

- the Independent Audit Program submitted to the Department and the Certifier under CoC C34;
- the requirements of an Independent Audit Methodology and Independent Audit report in the Independent Audit Post Approval Requirements (Department of Planning and Environment, June 2018); and
- the processes and practice procedures identified in *AS/NZS ISO 19011:2014 - Guidelines for Auditing Management Systems*.

The audit report documents the outcomes of the review of compliance undertaken by Aspect Environmental Pty Limited (Aspect). The audit process comprised pre-site audit documentation review, stakeholder scoping review, opening meeting, site audit, closing meeting and post-site audit documentation review and follow up.

The site audit was conducted in February 2020, with a site inspection and interviews undertaken on the 26 of February 2020. Findings of the audit are presented against the required scope within the body of this report, the attached Audit Findings Table (Appendix A) and in the Photo Log provided (Appendix B).

Consultation was undertaken with the Department of Planning, Infrastructure and Environment (DPIE) with Penrith City Council. . The DPIE requested that the scope of the audit be inclusive of a review of implementation of the CEMP onsite and site contamination. No adjustment was made on the basis of Penrith City Council's response.

It was found that the site was generally compliant and the project was generally being managed in accordance with the requirements of the SSD 9354 consent. Of the 124 CoC relevant to the current audit, the following findings of compliance were made:

- 83 compliant
- 6 non-compliant and
- 35 not triggered.

The non-compliances are summarised as:

- requirements to publish documentation or make documentation publicly available (A22 and C37);.
- demonstration of notification to DPIE and/or certifying authority (C29, C37);.
- non-completion of documentation requirements within specified timeframe (B9, C39)
- Demonstration of consultation and approval requirements where specified (B22, C39).

Environmental performance of the development was considered to be satisfactory with no significant discernible offsite impacts at the time of audit and appropriate management controls implemented on site to reduce potential for environmental impacts.

This audit constitutes the second independent construction audit completed for the development. The previous audit had one non-compliance :

CoC B35 – This condition requires written notification to the Planning Secretary and the Certifying Authority at least 7 days in advance of publishing the PCCR on the project website. Sighted correspondence from DoE dated 3/10/19 (DOC 19/868306), notifying the Department that the PCCR will be made publicly available no sooner than 7 days following the submission of this letter. It is noted that due to an email administrative error, the letter was only received by the Department on 14/10/19. However, written notification to the Certifying Authority that the PCCR is now publicly available on the project website was not notified until 28/10/19. This date is post the publishing date on the project website, rather than at least 7 days prior as per condition requirements.

A review of perceived impacts and suggested mitigation and management measures from the EIS versus actual impacts and mitigation measures implemented as part of the project was also undertaken. The requirement for site activities and management plans and control documentation to address the predicted impacts was evidenced and predicted impacts align with the nature scale and extent of works observed onsite.

The reviewed CEMP and Sub-plans were considered to generally be adequate for the nature of the site. Improvement opportunities and observations were identified pertaining to:

- chemical storage and labelling;
- signage for spill kit;
- boundary erosion and sediment control;
- review and record/documentation requirements; and
- weed management.

In terms of site contamination management, it was noted that the Site Audit Statement remained outstanding at the time of audit, but has subsequently been completed and advised post- issue of the draft audit report.

The audit protocol and findings are summarised in Section 3 of the report and provided in detail in Appendix A.

The audit concludes that the Jordan Springs Public School is being constructed generally in compliance with the requirements of the SSD.

Table of Contents

EXECUTIVE SUMMARY	II
1. INTRODUCTION	7
1.1. PROJECT BACKGROUND	7
1.2. PROJECT LOCATION.....	7
1.3. STATE SIGNIFICANT DEVELOPMENT	8
1.4. AUDIT INTRODUCTION	9
1.5. AUDIT OBJECTIVES.....	9
1.6. INDEPENDENT AUDITOR.....	9
1.7. AUDIT CRITERIA	10
1.8. AUDIT SCOPE.....	10
1.9. AUDIT PERIOD	11
2. AUDIT METHODOLOGY	11
2.1. SELECTION AND ENDORSEMENT OF AUDITOR	11
2.2. INDEPENDENT AUDIT SCOPE DEVELOPMENT	11
2.3. COMPLIANCE EVALUATION	12
2.4. SITE INTERVIEWS	12
2.5. SITE INSPECTION	12
2.6. CONSULTATION	12
2.7. COMPLIANCE STATUS DESCRIPTORS	13
2.8. OPENING MEETING – SITE AUDIT	13
2.9. CLOSING MEETING – SITE AUDIT	13
2.10. REVIEW AND RESPONSE TO DRAFT INDEPENDENT ENVIRONMENTAL AUDIT REPORT	14
3. AUDIT FINDINGS	16
3.1. PROJECT BOUNDARY AND SETTING	16
3.2. APPROVAL AND DOCUMENT LIST	16
3.3. COMPLIANCE PERFORMANCE	18
3.4. SUMMARY OF AGENCY NOTICES, ORDERS, PENALTY NOTICES OR PROSECUTIONS	18
3.5. AUDIT NON-COMPLIANCES	18
3.6. EMP, SUB-PLANS AND POST APPROVAL DOCUMENTS	20
3.7. ENVIRONMENTAL MANAGEMENT SYSTEM	28
3.8. ENVIRONMENTAL PERFORMANCE	29
3.9. CONSULTATION OUTCOMES	30
3.10. COMPLAINTS	31
3.11. SITE INSPECTION	31
3.12. SITE INTERVIEWS	31
3.13. COMPLIANCE REPORT RECOMMENDATIONS.....	32
4. RECOMMENDATIONS.....	33
4.1. NON-COMPLIANCE RECOMMENDATIONS	33
4.2. IMPROVEMENT OPPORTUNITIES RECOMMENDATIONS	33
5. CONCLUSION	34
APPENDIX A - AUDIT PROTOCOL AND FINDINGS	35
APPENDIX B – SITE AUDIT PHOTO LOG	36
APPENDIX C - CONSULTATION	37

List of Figures

- Figure 1 Site location (Source: Urbis EIS January 2019)
Figure 2 Aerial photograph of site showing boundary of SSD 9354 (Source: Urbis EIS January 2019)

List of Tables

- Table 1 Approval and document list
Table 2 Construction site document list
Table 3 Summary of SSD compliance findings
Table 4 Summary of audit non-compliances
Table 5 EMS component audit scope
Table 6 Environmental aspect audit scope
Table 7 Agency consultation outcomes
Table 8 Improvement opportunities versus prescribed CoCs
Table 9 Improvement opportunities versus environmental aspects

Glossary	
Audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.
Audit criteria	Set of policies, procedures or requirements.
Audit evidence	Records, statements of fact or other information, which are relevant to the audit criteria and verifiable. Audit evidence may be qualitative or quantitative.
Audit findings	Results of the evaluation of the collected audit evidence against the audit criteria.
Audit conclusion	Outcome of an audit provided by the audit team after consideration of the audit objectives and all audit findings.
Audit client	Organisation or person requesting an audit.
Auditee	Organisation being audited.
Auditor	Person with competence to conduct an audit.
Audit team	One or more auditors conducting an audit, supported if needed by technical experts. One auditor of the audit team is appointed as the audit team leader. The audit team may include auditors in training.
Audit plan	Description of the activities and arrangements for an audit.
Audit scope	Extent and boundaries of an audit.
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.
Improvement opportunity	A finding resulting from either site inspection or document review which enables the auditee to consider the adoption of an action or strategy that will enhance environmental performance against the audit criteria.
Non-Compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.
Observation	A comment on an environmental aspect, value or management control, process or record that is not a specific requirement of the audit criteria.

1. INTRODUCTION

1.1. Project Background

Jordan Springs Public School (the school) is located at 14-28 Cullen Avenue, Jordan Springs. The school will be a new school catering for students from Kindergarten to Year 6. The school will accommodate approximately 1,000 students and 70 full-time staff and will assist in alleviating pressure on existing school enrolments in the area and cater for future population growth.

The Project comprises the following:

- construction of a 2-storey library, administration and staff building (Block A);
- construction of three 2-storey learning hubs containing 42 homebases ;
- construction of a single storey assembly hall (Block B) with a performance stage, integrated covered outdoor learning area, OOSH facilities and storeroom areas;
- associated site landscaping and open space including associated fences throughout and sporting facilities;
- pick-up and drop-off zone from Cullen Avenue;
- pedestrian access points along both Cullen Avenue and Lakeside Parade;
- construction of an at-grade car park containing 62 spaces accessible from Lakeside Parade and 2 spaces accessible from Cullen Avenue;
- school signage to the front entrance; and
- new substation fronting Cullen Avenue.

1.2. Project Location

The project site is located at 14-28 Cullen Avenue, Jordan Springs on Lot 22 in DP 1194338 (Figure 1). The site is within the Penrith Local Government Area and is irregular in shape with a total area of approximately 2.84 ha. The site was vacant land except for a substation located in the south-west corner of the site fronting Lakeside Parade.

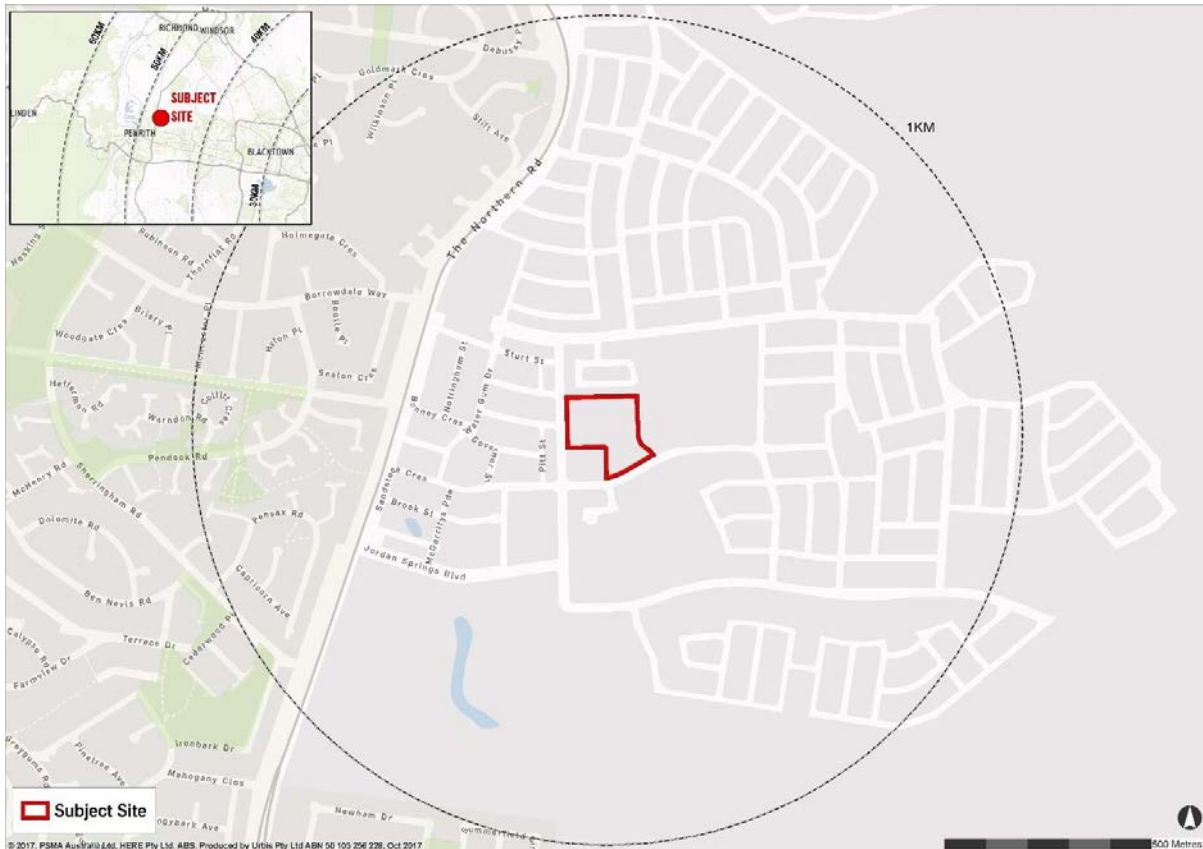


Figure 1 Site location (Source: Urbis EIS January 2019)

1.3. State significant development

The Jordan Springs School Project is a State significant development (SSD 9354) that was assessed under Part 4 of the *Environmental Planning and Assessment Act, 1979* (EP&A Act) by the NSW Department of Planning, Industry and Environment (DPIE). Conditions of Consent (CoC) were issued by the DPIE on 5 September 2019. These CoC have been used to inform the scope of this independent audit.

Delivery of the school is via two stages. Stage 1 is the delivery of the library, hall, covered outdoor learning areas, basketball courts and hardstand, core facilities for administration and staff, and 27 home bases. At the completion of Stage 1, the area dedicated for Stage 2 will be grassed and will serve as play area. As all core facilities including carparking and pick-up/drop-off facilities are in Stage 1, the school will have the capacity to be fully operational until such time Stage 2 can be delivered. The school capacity at the end of Stage 1 is up to 600 students.

Stage 2 includes the remaining 14 home bases and rectification landscaping works. It will increase the school capacity up to 1,000 students. Whilst the timing of Stage 2 delivery is currently unknown, the construction period is anticipated to take four months. During this time, the school will be operational and the shaded area detailed below will be a construction zone.

Appropriate safety measures to separate the site, including hoarding and traffic control, will be implemented. Construction vehicles will access the site via Lakeside Parade, per the

approved Construction Traffic Management Plan and will be restricted during peak school times in the morning and afternoon.

The conditions of the SSD 9354 are structured under the following category headings:

- Part A - Administrative Conditions (A1-A30)
- Part B - Prior to Commencement of Construction (CB1-B36)
- Part C - During Construction (C1-C39)
- Part D - Prior to Commencement of Operation (D1-35)
- Part E – Post Occupation (E1-E16).

The SSD instrument also provides definitions for key terms used within the conditions and two Appendices.

1.4. Audit Introduction

Independent environmental audits are required to be undertaken under CoC C36.

Condition C34 identifies that:

‘Prior to the commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.’

The Independent Audit Program (IAP) was prepared by Aspect Environmental Pty Limited (Aspect) and submitted to the DPIE on 19 September 2019. The IAP was prepared in accordance with the Independent Audit Post Approval Requirements (IAPAR) (DP&E, 2018). This Independent Environmental Audit has been prepared in accordance with the submitted IAP, inclusive of the documented Independent Audit Methodology within the IAP, and the IAPAR.

1.5. Audit Objectives

The objectives of the Independent Environmental Audit are to identify the compliance, or otherwise, of the current (construction) phase of development of the Jordan Springs Project with the issued CoC for SSD 9354 and to provide an objective evaluation of environmental performance of the development.

1.6. Independent Auditor

This initial independent environmental audit was conducted by Richard Johnson of Aspect as the lead auditor. Richard has tertiary qualifications in science (BSc) and law (Diploma in Law) and has 28 years of experience in environmental assessment and management. Richard completed certification for environmental auditing from Det Norske Veritas in 1997.

A statement of independence is provided at the beginning of this document to identify no actual or perceived conflict exists in the performance of the independent environmental audit.

1.7. Audit Criteria

The audit criteria for this audit are identified by the CoC for SSD 9354 and by the expectations of the IAPAR (DPIE, 2018).

The Audit Findings (Appendix A) identify the relevant criteria and the performance in terms of audit evidence collected or observed against the criteria to verify compliance during the course of conducting the audit.

1.8. Audit Scope

The scope of auditing requirements has been based on consideration of:

- the project SSD EIS (Urbis, January 2019) and associated Response to Submission documentation (Urbis, 3 June 2019);
- the compliance requirements typical of such developments, in this instance referenced to the CoC procedural and documentation requirements:
 - to support the administrative conditions (Part A)
 - prior to commencement of construction (Part B)
 - during construction (Part C); and
- the independent auditing requirements and expectations specified in the IAPAR (2018).

The audit scope consisted of:

- an assessment of compliance with CoC and other relevant approvals and licences;
- an assessment of environmental performance of the development including:
 - an assessment of actual impacts compared to predicted impacts documented in the EIS
 - an assessment of incidents, non-compliances and complaints that have occurred on the project
 - an assessment of feedback received from the Department, and other agencies and stakeholders (i.e. DPIE and Penrith City Council)
 - an assessment of 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;
- a high-level review of the Project's environmental management system (EMS);
- a high-level assessment of the adequacy of the Project's environmental management plans and sub-plans; and
- any other matters considered relevant e.g. as identified through consultation with relevant agencies and review of complaints registers (management plan implementation and site contamination).

This scope is consistent with that identified within the IAP (Aspect, September 2019) and the IAPAR.

1.9. Audit Period

The audit is confined in time to the status of the site documentation, reviewed between 26 February 2020 and 20 March 2020, and site operations at the time of the site inspection undertaken on 26 February 2020.

2. AUDIT METHODOLOGY

2.1. Selection and Endorsement of Auditor

Lead Auditor: Richard Johnson

Richard holds tertiary qualifications in science (BSc) and law (Diploma in Law) and has 28 years of experience in environmental assessment and management. Richard completed certification for environmental auditing from Det Norske Veritas in 1997.

Endorsement from DPIE compliance team was provided via emails on 9 and 13 September 2019. The DPIE agreement to the nominated lead auditor was received on 18 September 2019.

2.2. Independent Audit Scope Development

The DPIE sets out the minimum requirements to be met when undertaking independent audits in accordance with CoC and the Independent Audit Post Approval Requirements (DP&E 2018). These requirements apply to all SSD where an independent audit is required by the CoC.

An independent audit program prepared by Aspect (September 2019) outlined the scope of auditing requirements for the project. This audit scope was discussed during the opening meeting on 26 February 2020.

Requirement for further development of the scope of the audit was considered through agency consultation (DPIE and Penrith City Council) and review of complaints registers and additional licence, permit or approval requirements.

Review of Complaints Register

A review of complaints registers identified various means of registering a complaint for the development. Complaints may be recorded via the project's website schoolinfrastructure@det.nsw.edu.au or alternatively to the dedicated project 1300 Community Hotline number or to Richard Crookes Project/Site Management team directly. Each of which would be directed back to the single point source for collation and any subsequent action.

One complaint was received, dated 19/12/2019, relating to parking on the public roads. No amendment was made to the audit scope following review of the complaints register.

2.3. Compliance Evaluation

The audit findings are based on verifiable evidence either sighted, reviewed, collated or observed. The following methods were used to obtain verifiable evidence relevant to the audit scope:

- review of project records, documentation and reports including physical and digital versions either provided directly by project representatives or available as published, publicly available information online;
- interviews with construction project personnel;
- interviews/correspondence with third-party stakeholders; and
- site inspections, including collection of photographic evidence.

A review of verifiable evidence was undertaken against the identified audit criteria to determine the level of compliance.

2.4. Site Interviews

Site interviews were conducted on 26 February 2020. The following personnel were interviewed:

- Darryl Duffey – WHSE Manager, Richard Crookes Construction;
- Isaac Pinkerton - Site Engineer, Richard Crookes Construction; and
- Tom Hemmett – Lead Engineer, Richard Crookes Construction.

Site interviews were conducted within the site office and during the course of the site inspection.

2.5. Site Inspection

An inspection of the entire project site was carried out on 26 February 2020. The site inspection was accompanied by the Richard Crookes Construction site management team.

The site inspection comprised a walkover of the defined construction footprint (including external boundary where accessible) and included internal and external work environments.

2.6. Consultation

Consultation was undertaken with the DPIE 25 February 2020. The DPIE requested that the scope of the audit be inclusive of review of implementation of the CEMP onsite and site contamination, in addition to the consideration of compliance against all conditions of consent. No requirement for technical specialist review was identified as a result of this consultation.

Consultation with Penrith City Council was also undertaken on 25 February 2020. No adjustment was made to the audit scope in response to Council's response.

A copy of the received correspondence is provided at Appendix C of this report.

2.7. Compliance Status Descriptors

Compliance findings resulting from the assessment of audit evidence have been divided into three categories as follows:

- **Compliant:** The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
- **Non-compliant:** The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
- **Not triggered:** A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Some of the recorded audit findings identify improvement opportunities in relation to audit criteria that have been identified as compliant, for consideration by the proponent.

2.8. Opening Meeting – Site Audit

The audit commenced with an opening meeting. During the opening meeting the objectives of the audit, the scope of the audit, the resources required and methodology to be applied were discussed. Attendees at the meeting were:

- Jaron Hoffenberg (Project Manager, TSA);
- Darren Vozzo (Project Manager, Richard Crookes Construction);
- Darryl Duffey (WHSE Manager, Richard Crookes Construction);
- Tom Hemmett (Lead Engineer, Richard Crookes Construction);
- Isaac Pinkerton (Site Engineer, Richard Crookes Construction);
- Richard Johnson (Lead Auditor, Aspect); and
- Mathew Williams (audit support, Aspect).

2.9. Closing Meeting – Site Audit

The site audit closing meeting was held on the afternoon of 26 February 2020. The site audit closing meeting was attended by:

- Jaron Hoffenberg (Project Manager, TSA);
- Martin Fenn (Senior Project Manager, TSA);
- Madeleine Nouri (Assistant Project Manager, TSA);
- Darryl Duffey (WHSE Manager, Richard Crookes Construction);
- Tom Hemmett (Lead Engineer, Richard Crookes Construction);
- Isaac Pinkerton (Site Engineer, Richard Crookes Construction);
- Richard Johnson (Lead Auditor, Aspect); and
- Mathew Williams (audit support, Aspect).

At the site audit closing meeting, preliminary audit findings were presented with improvement opportunities. These related to:

- chemical storage - labelling of contents);
- signage – location of a spill kit;
- erosion and sediment control; and

- weed management.

It was identified that during the post-site audit phase further review of records and documentation would be undertaken prior to the issue of the draft audit findings. This process would provide TSA and Richard Crookes Construction with the ability to provide further evidence for verification (if required/available) against the audit criteria that may not have been identified or accessible at the time of the site audit. Provision of any such evidence would enable the compliance assessment to be reviewed prior to issue of the final audit findings, although it was identified that the review of supplementary evidence would not automatically change an audit finding.

2.10. Review and Response to Draft Independent Environmental Audit Report

The draft audit report was provided to TSA and Richard Crookes Construction for review on 27 March 2020 to allow an opportunity to provide any additional information before finalising the audit report.

A draft report finding would generally only be revised in instances where the auditor is satisfied that the additional information or evidence provided is sufficient to determine that an error of fact or misunderstanding has taken place, and this is adequately supported by the provision of additional objective audit evidence that was not available at the time of site audit. Any additional information provided by a proponent in this regard must be noted in the report and the auditor's view in relation to it recorded.

The following additional information has been provided after the Applicant's review of the Draft Independent Audit Report:

ID	Requirement	Independent Audit Findings	Independent Audit Recommendations	Department of Education Actions	Evidence Provided
B25 and C28	Site Audit Statement and Site Auditor review and confirmation of Interim Advice reviewing the UXO management protocol.	Compliant. Finding remains.	Inclusion of UXO unexpected find coverage in unexpected find section of CEMP	To be captured in any review of CEMP document.	Site Audit Statement from Zoic dated 17 March 2020, received 8 April 2020.
C29	Notification of DPIE re: contamination testing results and disposal location prior to removal	Non-compliant. Finding remains.	Notification to be provided	Notification in preparation as of 8 April 2020	Tipping dockets and disposal classification advice sighted in TSA email of 8 April 2020

ID	Requirement	Independent Audit Findings	Independent Audit Recommendations	Department of Education Actions	Evidence Provided
C39(c)	Consultation with Council re: street tree type and spacing.	Non-compliant. Finding remains due to timing provisions of condition C39 .	NA	Consultation with Penrith Council	Email correspondence dated 22 January 2020 from Penrith City Council to Richard Crookes.

No changes were made to the audit findings following the Applicant's review of the Draft Audit Report.

Under SSD 9354 CoC C37, the Applicant is required to prepare a response to the final Independent Audit Report and submit its response to the Department and Certifier and to make the Independent Audit Report and the Applicant's response publicly available within 60 days of submission.

3. AUDIT FINDINGS

This section of the audit identifies the reported audit findings based on a review of available audit evidence during the audit period, evaluated against the defined audit criteria.

3.1. Project Boundary and Setting

The project boundary is identified by the boundaries of SSD 9354 as shown in Figure 2 below. The audit is confined in time to the status of site operations at the time of the site inspection component of the audit, being 26 February 2020. The audit provides a representative snapshot of performance at the time of the site audit.

Documentation relevant to the audit scope was made available pre-site audit for information and review. Follow-up documentation was provided post-site audit to address questions or items raised at the time of the site audit, during the closing meeting or identified in the draft audit findings.



Figure 2 Aerial photograph of site showing boundary of SSD 9354 (Source: Urbis EIS January 2019)

3.2. Approval and Document List

Documents referenced as part of this audit are provided in the tables below. A list of relevant approval documents is provided in Table 1. Site specific registers, procedures and checklists sighted as part of this audit are provided in Table 2.

Table 1 Approval and document list

Approval Reference	Document Details
Environmental Impact Statement	Jordan Springs Public School EIS was produced by URBIS and dated January 2019.
State significant development	SSD 9354 dated 5 September 2019.
B7 Unexpected Contamination Procedure	An unexpected contamination procedure was prepared by WSP and is dated 23 August 2019.
B8 Community Communication Strategy	A Community Communication Strategy has been prepared by Schools Infrastructure NSW and is dated September of 2019.
B13 Construction Environmental Management Plan	Richard Crookes Construction has produced the CEMP. The CEMP Rev 5 is dated 7 November 2020.
B15 The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP)	Jim's Traffic Control (Hornsby) produced the CTPMSP. The plan is dated 13 September 2019 Version 2.0.
B16 The Construction Noise and Vibration Management Sub-Plan (CNVMSP)	The CNVMSP was produced by Acoustic Logic. The plan is dated 9 September 2019.
B17 The Construction Waste Management Sub-Plan (CWMSP)	The CWMSP was prepared by ECCELL Environmental Management and is dated 6 September 2019.
B18 Construction Soil and Water Management Plan (CSWMP)	A CSWMP Rev 5 was prepared by Northrop and is dated 13 September 2019.
B19 Flood Emergency Response Sub-Plan (FERSP)	The FERSP has been prepared by Molino Stewart. The plan is dated September 2019.
C25 Aboriginal Heritage Management Plan (AHMP)	An AHMP was produced by Biosis and is dated 16 August 2019.
C39 Landscape Management Plan	A Tree Planting Strategy prepared by Group GSA (L-5100 Rev C , 15/12/2019) was referenced.

Table 2 Construction site document list

Document Details	Document Details & Observations
Traffic – Haul Routes	Sighted screenshot from TMO indicating approved haul routes.
Environmental Inspection Records	The environmental inspection checklist was sighted.
Waste Disposal Records	Waste disposal records for 8/11/19 through to 15/11/19 were sighted together with corresponding weighbridge dockets from Brandown (ref SOR-1877264 8/11/19 – SOR-1879273 15/11/19)
Wastewater Disposal Record	<p>Due to significant storm events in February, wastewater was not removed from site for disposal. Site waters were flocced, sampled and discharged from site.</p> <p>Sighted diary entry dated 10/02/20 detailing order of flocculant agent (6 x 20ltr drums).</p> <p>Sighted invoice from UWS for delivery of 6 x 25 ltr flocculant drums.</p>

3.3. Compliance Performance

Compliance performance is assessed against the nominated audit criteria as applied to the audit scope and are included in detail in Appendix A. Findings are based on an evaluation of the documentation and field-based observations, presented in support of compliance against the audit requirements. A photo log to support the findings was compiled during the site audit and is presented in Appendix B to this report.

A summary of SSD compliance findings is presented in Table 3.

Table 3 Summary of SSD compliance findings

SSD Category	# Requirements	# Compliant	# Non-Compliant	# Not Triggered
Part A - Administrative	30	14	1	15
Part B - Prior to Commencement of Construction	36	30	2	4
Part C - During Construction	39	30	3	6
Appendix 1 Written Incident Notification and Reporting Requirements	4	0	0	4
Appendix 2 Advisory Notes	15	9	0	6
Total	124	83	6	35

The detailed evidence and findings of the audit are provided in Appendix A.

3.4. Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

The project has not been issued with any agency notices, orders, penalty notices or prosecutions to date.

3.5. Audit Non-Compliances

Of the 124 CoCs relevant to the current audit, a total of 6 non-compliances were identified as summarised in Table 4.

Table 4 Summary of audit non-compliances

Approval (ID)	Audit findings
A22 (a)	Requires certain information and documents (as they are obtained or approved) to be publicly available on the Project website. (iii) The most recent versions of the CEMP (Rev 5 dated 7 November 2019) is not on the Schools Infrastructure Project website. The website displays Rev 3 dated 16/09/19. (ix) requires audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report. The Independent Audit completed by Aspect Environmental dated 12/11/19 and the Applicant's response to the

	recommendations in Aspects audit are not available on the Schools Infrastructure Project Website.
B9	<p>Requires registration for a minimum 4-star Green Star rating with the Green Building Council Australia or approval from the Planning Secretary for an alternative certification process. DoE requested a 6 month extension on 16/09/19 to assess an alternate ESD certification pathway. DPIE provided a 3 – month extension from date of commencement which would require approval by end of December 2019.</p> <p>No evidence was provided to verify ESD objectives are being achieved by either minimum 4-star Green Star with the Green Building Council Australia, or an alternative certification process.</p>
B22	Condition requires detailed plans to be prepared in consultation with and approved by Council within 3 months of commencement of construction, i.e. by end of December 2019. While consultation has been evidenced, Council approval has only been provided for signage and line-marking. No evidence has been sighted that the remaining public domain works have been approved.
C29	<p>Requires that where any material identified as contaminated is to be disposed off-site, the disposal location and results testing for the unexpected asbestos find in soil were submitted to the Planning Secretary prior to its removal from the site.</p> <p>No evidence to verify that notification occurred was provided.</p>
C37	<p>Requires each Independent Audit Report and response to be made publicly available within 60 days after submission to the Planning Secretary and notify the Planning Secretary and the Certifying Authority in writing at least seven days before this is done.</p> <p>The Independent Audit Report completed by Aspect Environmental in November 2019 and the Applicants Response Report are not available on the Schools Infrastructure Project website as per the requirements of C37 (c).</p>
C39	<p>Requires the Landscape Management Plan to be endorsed by the Certifying Authority within 3 months (12 weeks) of commencement of construction. The Certifying Authority (Group DLA) did not confirm their endorsement of the Landscape Management Plan until approximately 22 weeks after construction commenced.</p> <p>No evidence of consultation with Council under C39(c) has been sighted.</p>

3.6. EMP, Sub-plans and Post Approval Documents

A list of the post-approval EMP and Sub-plans has been provided in Table 1. Additional documentation reviewed as part of the site audit is provided in Table 2.

In response to consultation with DPIE, the audit scope was asked to have a focus on implementation of management plans and site contamination (refer Appendix C). These items are addressed in this section of the report.

Implementation of management plans

Site controls and management requirements were clearly identified on site at the site entrance point from the construction site sheds. These were identified as being consistently followed up and presented in both induction procedures and in toolbox sessions (reference Toolbox meeting dated 25/2/20 with attendance signatures).

A number of the site management plans introduce requirements for reviews, reporting and maintenance of records. Examples of these are found in the following documents (as examples only):

- Construction Traffic and Pedestrian Management Sub-Plan (CEMP Appendix F)
- Construction Noise and Vibration management Sub-Plan (CEMP Appendix G)
- Construction Waste Management Sub-Plan (CEMP Appendix H)

While the value in these inclusions is appreciated, the scale nature and perceived likely impacts associated with the works on site either do not warrant their requirement or do not generate the need for the documentation. For example a documented review of traffic management setup and conditions has not been sighted and has been effectively achieved on site (as evidenced during site interviews, refer Figure 3) through collaboration and progressive site management of available space.



Figure 3 Reallocation of hardstand unloading area to construction car parking

This is a practicable and reasonable outcome without the need for prescribing documentation requirements.

Similarly, noise survey results are not available as the site is effectively managing its boundary noise impacts. It is identified that noise monitoring would be undertaken should an issue arise to determine any requirement for subsequent mitigation, but this has not been required to date.

Given the nature, scale and likely extent of impacts having regard to the type of equipment and its location on site, this is considered to be a reasonable and feasible approach to noise management. This is demonstrated by the removal of the noise curtain between the site and the adjacent child care centre without adverse impact. The site continues to have no identified noise complaints.

In reviewing the implementation of the various management plans on site, improvement opportunities exist across the site specifically in terms of:

- waste collection (refer Figure 4 and Figure 5);
- maintenance of location of response materials (refer Figure 6);
- labelling of chemicals/containers (refer Figure 7 and Figure 8);
- removal of redundant materials/equipment (refer Figure 9);
- minor spills (refer Figure 10);
- soil erosion control reinstatement response (refer Figure 6, Figure 11, Figure 12, Figure 13, and Figure 14); and
- weed management (refer Figure 15).



Figure 4 Elongated waste projection from skip



Figure 5 Mixed and collected waste



Figure 6 Low accessibility fire extinguisher



Figure 7 Flocculant drums with no clear hazard indication for handling or storage



Figure 8 Unidentified liquid in home brew container adjacent works area



Figure 9 Disused temporary fencing structures left outside site boundary



Figure 10 Minor spill - approx. 15 cm across



Figure 11 Boundary sediment controls - overtopped and displaced coir roll, saturated hay bales, collapsed sediment curtain.



Figure 12 Boundary sediment controls



Figure 13 Boundary sediment controls - curtain above ground level



Figure 14 Boundary sediment controls - collapsed sediment curtain

It was noted that the site was audited not long after a significant rainfall event across the Sydney basin and the site was in the process of progressively re-instating the relevant soil erosion controls at the boundary.



Figure 15 Weed growth at north eastern boundary

A total of 5 improvement opportunities are recommended:

- chemical storage - correct and adequate labelling of storage containers;
- emergency response signage and location – there was a sign indicating the location of a spill kit while the spill kit was present, approximately 30 m away, it was not in the location that site staff would be expected to be able to locate it in the event of an emergency. Absence of the spill kit in its designated location would indicate it was being used for a spill on site, however, this was not observed to be the case;
- erosion and sediment control – some sections of sediment fence required attention (not keyed into the ground correctly or requiring reinstatement post-storm event). It was noted onsite that this was a work in progress in response to recent storm events;
- review of management plan requirements for process reviews, records and documentation to simplify site expectations and reflect actual site processes; and
- weed management – assess the need for weed control, particularly on stockpiles and adjacent to fences. Any commercial application of herbicide should be undertaken with an awareness of licensing, training/certification, record keeping and notification requirements that may be applicable under the *Pesticides Act 1999* and the *Pesticides Regulation 2017*.

Each of the items noted above were identified during the closeout meeting with the site team as representing an opportunity to enhance housekeeping issues that would demonstrate a clear and proactive implementation of the site management plans that is consistent with site notices for implementation.

Contamination

The Site Audit Statement, identifying the site as being suitable for its intended use, was not available at the time of audit. Equally, the confirmation of the suitability of the Unexploded Ordinance Protocol by the Site Auditor as anticipated by CoC B25 and C28, was not identified at time of audit, though correspondence confirming consideration and interim advice was sighted from Zoic on 19 October 2019.

The unexpected finds protocol for contamination as contained in Appendix K of the CEMP relates solely to an assumption of an asbestos find and provides no discernible differentiation in management of friable and non-friable asbestos. The waste management section of the CEMP is slightly more comprehensive in terms of unexpected finds on site (refer Section 11, pg. 30 of CEMP v5 RCC, 7/11/19).

While Section 11 of the CEMP provides a suitable response to an unexpected contamination find, it may not be the first place looked at in the CEMP for the relevant information, with Appendix K being the logical point for information to be provided.

Management of asbestos materials (ACM) identified in surface soils is considered to have been appropriately managed and recorded, although notification requirements under C29 where not evidenced during the audit.

In terms of introduced contamination to site, the risk appears to be minor, particularly with the absence of large heavy vehicles and high numbers of earthmoving plant and equipment. Spills would be anticipated to be minor in nature and presently represented by minor hydrocarbon spills (Figure 10) or small quantities of trade materials, e.g. solvents, sealants or paints. These contained items were not observed on site, although empty containers were.

As the bulk of the site excavation works have been completed, the likelihood of uncovering an unexpected contaminant find is likely to be reduced. However, there is a substantial quantity of stockpiled material that remains to be managed and works will progress into stage 2.

There is considered to be value in providing a clear unexpected contaminant finds protocol to address potential finds beyond asbestos containing materials.

3.7. Environmental Management System

A high-level review of the EMS adequacy was undertaken as part of the project audit. The EMS components reviewed as part of the audit scope are provided in Table 5.

Table 5 EMS component audit scope

EMS Component	Requirement
Legal Requirements Register	Identification of applicable legislative requirements, applicable standards, codes of practice and industry guidelines with demonstration of relevance to the project scope.
Aspects/Impacts Register	Identification of the Projects environmental aspects and impacts with identification of those aspects/Impacts of high significance to the project.
Roles and Responsibilities	Identification and allocation of roles and responsibilities to relevant site and management personnel to provide effective site environmental management and performance.
Training	Identification of awareness and vocational training requirements relevant to the nature of works to be performed and associated environmental values or requirements identified within the Aspects/Impacts and Legal Requirements register.
Monitoring and Review	Program and process for monitoring and review of the Project EMS to demonstrate applicability.
Communications	Identification of how the EMS is implemented during the course of the project, including the communication of change and access to information.

The expected elements of an EMS were identified as being implemented through activities on site, induction and training programs, toolbox talks, risk notice boards, environmental management notices and in the progressive review and implementation of management plans.

3.8. Environmental Performance

The environmental performance of the project was assessed during the site visit against the environmental aspects listed in Table 6.

Table 6 Environmental aspect audit scope

Environmental Aspect	Requirement
Air	Dust and other emissions are being managed on site and generally confined to site. No record of incidents/complaints.
Noise	Work hours are within approved hours. Noise mitigation evident. No record of incidents/complaints.
Land (ErSed)	Sediment and erosion controls are performing to control surface erosion and discharges from site within acceptable limits. No record of incidents/complaints. Reinstatement requirements to be prioritised.
Land (contam)	Any identified contaminant materials are effectively contained, controlled and removed from site for treatment and disposal. Record of any unexpected finds. Asbestos clearance and disposal certification sighted.
Water	Site surface water is managed to prevent scouring of banks of receiving waters. Clean water is separated from dirty water (i.e. construction works contact water). Spill Notifications. No record of incidents/complaints.
Waste	Containment and appropriate sorting of waste as appropriate. Removal of surplus waste items would improve general housekeeping. No record of incidents/complaints.
Heritage	Clear identification of heritage items and demarcation within the construction site to prevent accidental harm.
Traffic	Traffic management, access and flow is maintained. No tracking of soil/muds onto public roads. Record of incidents/complaints identifies one complaint re: on-street parking and this was resolved and closed out.
Flora/Fauna	Pre-clearing checks undertaken. Demarcation of no-go zones. Record of incidents/complaints.

Environmental performance in respect of the relevant environmental aspects identified in Table 6, was found to be satisfactory with sound site environmental management generally exhibited on site.

While some housekeeping and reinstatement of controls was identified during the course of the audit, environmental controls implemented across the site were generally adequate in controlling environmental risks across the project site.

3.9. Consultation Outcomes

Stakeholders were contacted on the 25 February 2020, and feedback sought with regards to project performance. A summary of the feedback received is provided in Table 7 Agency consultation outcomes. Copies of received correspondence are included in Appendix C of this report.

Table 7 Agency consultation outcomes

Agency	Contact	Date	Comment
Penrith City Council	Gavin Cherry	17/03/20	<p>Council's Compliance Team has no record of any complaints or compliance investigations relating to this site and the works subject of the consent.</p> <p>Council's Environmental Management Team has not identified any matters specifically to address beyond the wording in the consent conditions however given the condition was imposed by the Department as the consent authority, verification of the matters below should be pursued with the Department directly.</p>
DPIE	Michaela Burgess	25/02/20	Review of CEMP implementation onsite and site contamination, in addition to all conditions of consent for SSD 9354.

An address of the two requested DPIE scope items has been provided at 3.6 above.

3.10. Complaints

Complaints may be recorded via the project's website schoolinfrastructure@det.nsw.edu.au or alternatively to the dedicated project 1300 Community Hotline number or to Richard Crookes Project/Site Management Team directly.

The NSW Department of Education – School Infrastructure Complaints Register for the project was viewed online on the 27 February 2020 (last updated 8 January 2020). At this time the register had one complaint registered. The details of this complaint are summarised in Table 8.

Table 8 Agency consultation outcomes

Date of Complaint	Date of Response	Method of Complaint	Nature of Complaint	SINSW Response	Complaint Status	Is this Complaint an emergency
19/12/19	07/01/20	Phone	Parking	Implementation of mitigation strategies and measures to assist.	Closed	No

The registered complaint was discussed with site personnel and it was identified as a stemming from a single local resident who objected to site worker-related parking in front of their residence. The complaint was responded to by adapting parking arrangements to avoid a recurrence.

3.11. Site Inspection

A site inspection as part of the audit was undertaken on 26 February 2020. During the site inspection, observations on the project's environmental performance were made and captured by site photos (Appendix B).

Environmental performance was determined to be satisfactory. It was noted that from the previous audit, there was an increase in contractor activity on site which appeared to contribute to a number of housekeeping observations that were subsequently identified as improvement opportunities in this audit report.

3.12. Site Interviews

The personnel listed in Section 2.4 were interviewed during the site visit. Site interviews were generally structured around the prescribed SSD CoCs, management plan expectations and EMS processes.

The site team was questioned on how the project might demonstrate compliance, response to, and an address of particular site conditions. Follow up questions on documentation of processes and site procedures pertaining to environmental management onsite were used to assess understanding of environmental risk and performance management expectations onsite, inclusive of communications and change management.

Overall, the site interviews demonstrated that the project personnel had a good understanding of environmental risks and controls associated with the project, the site and immediate neighbours/stakeholders. Processes to communicate site risks and management controls were observed during interviews and site observations.

3.13. Compliance Report Recommendations

There has been one compliance report for the project as required by CoC B35 – Pre-Construction Compliance Report, DoE, 20/09/19. The report concluded that there had been 0 non-compliances, 0 incidents and 0 complaints.

A Construction Compliance Report is due to be completed in March 2020.

4. RECOMMENDATIONS

4.1. Non-Compliance Recommendations

A total of 6 non-compliances were identified. These non-compliances can be categorised under confirmation of notification, consultation, approval timing and submission and consultation requirements.

None of these identified non-compliances are considered to represent an immediate significant risk of material harm to the environment.

These non-compliances can be addressed by adopting a proactive approach to management of methodology and evidence requirements contained in the compliance monitoring and reporting program to maintain clear visibility of documentation required to demonstrate compliance.

This process should be actively reviewed in the period between compliance reporting and in advance of project phase or stage advancement to ensure identified timing requirements are achieved.

4.2. Improvement Opportunities Recommendations

A total of 5 improvement opportunities have been recommended:

- chemical storage - correct and adequate labelling of storage containers;
- emergency response signage and location – there was a sign indicating the location of a spill kit while the spill kit was present, approximately 30 m away, it was not in the location that site staff would be expected to be able to locate it in the event of an emergency. Absence of the spill kit in its designated location would indicate it was being used for a spill on site, however, this was not observed to be the case;
- erosion and sediment control – some sections of sediment fence required attention (not keyed into the ground correctly or requiring reinstatement post-storm event). It was noted onsite that this was a work in progress in response to recent storm events;
- management plan requirements for process reviews, records and documentation; and
- weed management – assess the need for weed control, particularly on stockpiles and adjacent to fences. Any commercial application of herbicide should be undertaken with an awareness of training/certification, record keeping and notification requirements that may be applicable under the Pesticides Act 1999.

Each of the above items are considered to be relatively minor housekeeping matters that can be easily addressed, however, unchecked they have the potential to lead to more significant issues.

5. CONCLUSION

This Independent Audit Report satisfies the requirements of SSD 9354 CoC C36.

The audit has been conducted in accordance with the DPIE *Independent Audit Post Approval Requirements* (June 2018) and the AS/NZS ISO 19011:2014 – *Guidelines for Auditing Management Systems*. The audit report documents the outcomes of the review of compliance undertaken by Aspect. The audit process comprised pre-site audit documentation review, site audit, and post-site audit documentation review and follow up. The site audit was conducted on 26 February 2020.

It was found that the project was generally compliant with the CoC and construction activities are generally being managed in accordance with the requirements of the SSD instrument.

Six non-compliances were identified in respect of CoC A22(a), B9, B22, C29, C37 and C39.

- requirements to publish documentation or make documentation publicly available (A22 and C37);
- demonstration of notification to DPIE and/or certifying authority (C29, C37);
- non-completion of documentation requirements within specified timeframe (B9, C39); and
- Demonstration of consultation and approval requirements where specified (B22, C39).

Improvement opportunities and observations were also identified and recorded, associated with housekeeping issues that can be readily managed within the existing suite of management plans and site processes and their progressive review and implementation.

The audit concludes that the Jordan Springs Public School is generally being constructed in compliance with the requirements of the SSD instrument.

APPENDIX A - AUDIT PROTOCOL AND FINDINGS

Date of Audit 26/2/20
Auditor Richard Johnson
Location Jordan Springs Primary School

SSD 9354

Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Initial Construction Compliance Status Compliance Status		
				Compliant	Non-compliant	Not Triggered
Assessment of Environmental Performance						
Environmental Aspect						
Air	Dust and other emissions are being managed on site and generally confined to site. Record of incidents/complaints.	Stockpiles on the site were observed to be dry - Dense clay material. The main large stockpile onsite was stabilised with vegetation.	Compliance has been demonstrated.			
Noise	Work hours are within approved hours. Noise mitigation evident. Record of incidents/complaints.	The site access log book indicates workers arriving at 0700. No noise complaints have been received.	There is no record of incidents or complaints of excessive noise generating activities outside the approved work hours. Compliance has been demonstrated.			
Land (ErSed)	Sediment and erosion controls are performing to control surface erosion and discharges from site within acceptable limits. Record of incidents/complaints.	ErSed controls were observed to be in place and effective. There were no observed sediment discharges from site that were related to construction surface disturbance activities that would otherwise be above what would be expected from a natural storm event. No complaints have been received.	Compliance has been demonstrated.			
Land (contam)	Any identified contaminant materials are effectively contained, controlled and removed from site for treatment and disposal. Record of any unexpected finds.	Sighted Unexpected Finds Protocol prepared by WSP dated 23 August 2019 (PS114979-CLM-LTR-UFP RevA.docx). Appendix K of the CEMP contains the Unexpected Finds Protocol. No unexpected contamination has been encountered onsite.	Compliance has been demonstrated.			
Water	Site surface water is managed to prevent scouring of banks of receiving waters. Clean water is separate from dirty water (i.e. construction works contact water). Spill Notifications. Record of incidents/complaints.	There was no evidence of scouring, or rill erosion on the project. All dirty water reports to a sediment basin located in the southeast corner of the site. No complaints to date.	Compliance has been demonstrated.			
Waste	Containment and appropriate sorting of waste as appropriate. Record of incidents/complaints.	Mixed general waste skip bins observed were well maintained.	Waste management measures for the site are satisfactory.			
Heritage	Clear identification of heritage items and demarcation within the construction site to prevent accidental harm.	NA	Not triggered			
Traffic	Traffic management, access and flow is maintained. No tracking of soil/muds onto public roads. Record of incidents/complaints	Rumble grid in place and high pressure washing is available if required. The tracking of soil / muds to public roads was not observed during the site audit dates. No complaints to date.	Site traffic measures for the site are considered satisfactory.			
Flora/Fauna	Pre-clearing checks undertaken. Demarcation of no-go zones. Record of incidents/complaints.	NA	NA			
High-Level Review of Project EMS						
Legal Requirements Register	Identification of applicable legislative requirements, applicable standards, codes of practice and industry guidelines with demonstration of relevance to the project scope.	Legislation and its application to the project is included in Section 4 of the CEMP. Table 2 includes the required permits, licences and consents under the relevant Acts, regulation or policy.	Adequacy of the project's performance was demonstrated.			
Aspects/ Impacts Register	Identification of the Projects environmental aspects and impacts with identification of those aspects/Impacts of high significance to the project.	An Aspects/Impacts register was not sighted for the project. There was no clear indication of a linkage between on-site activities and change management processes and overarching EMS elements. Reliance was on the project CEMP as the reference for site control measures.	A project aspects/impacts register which feeds into the site risk register that references the Project's significant aspects/impacts would be beneficial. No demonstrated link beyond Project site to an EMS			
Roles and Responsibilities	Identification and allocation of roles and responsibilities to relevant site and management personnel to provide effective site environmental management and performance.	Section '2.0 Roles and Responsibilities' of the CEMP outlines the organisational structure, parties and responsibilities. The Environmental Specialist/ Engineer is responsible for implementing the CEMP and all required environmental controls, monitoring and inspecting activities for compliance etc.	Locally demonstrated.			
Training	Identification of awareness and vocational training requirements relevant to the nature of works to be performed and associated environmental values or requirements identified within the Aspects/Impacts and Legal Requirements register.	Induction material covers environmental items.	Locally demonstrated.			
Monitoring and Review	Program and process for monitoring and review of the Project EMS to demonstrate applicability.	Environmental monitoring requirements are included in each of the 'Summary of Management Procedures' table for each environmental aspect in the CEMP.	Locally demonstrated.			
Communications	Identification of how the EMS is implemented during the course of the project, including the communication of change and access to information.	The project team has demonstrated effective retention and accessibility to documentation and records. Reliance was on the project CEMP as the reference for site control measures.	Locally demonstrated.			

Conditions of Consent - 05/09/2019						
Part A - Administrative Conditions						
Obligation to Minimise Harm to the Environment						
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and, if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development.	General site environmental controls in accordance with CEMP and sub-plans are in place. No evidence of material harm on or offsite was observed during the site inspection.	Compliance with condition has been demonstrated.			
Terms of Consent						
A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS and Response to Submissions; (d) in accordance with the approved plans in the table below: <i>*Refer to CoC A2 for full list of plans</i>	Items (a) to (d) verified through site observation during site audit inspection on 26/02/20, site interviews on the same day with supervisory staff and HSE Officer and document review.	Compliance with condition has been demonstrated.			
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in (a) above.	NA	Not triggered - no directions received from Secretary.			
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.	NA	Not triggered - No project changes documented triggering an accordance or consistency assessment.			
Limits of Consent						
A5	This consent lapses five years after the date of consent unless the works associated with the development have physically commenced.	NA	Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.			
Prescribed Conditions						
A6	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.		Achievement demonstrated by findings of this audit.			
Planning Secretary as Moderator						
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.	NA	No disputes relating to Stage 1 of the project have been communicated during this audit. Stage 2 not commenced.			
Evidence of Consultation						
A8	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document for information; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Consultation with identified parties for a number of individual CoCs was sighted in correspondence during the Audit.	Compliance with condition has generally been demonstrated. However, consultation in respect of CoC C39 Landscape Management Plan has not been sighted.			
Staging						
A9	The project may be constructed and operated in stages. Where staged construction or operation is proposed, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted for the approval of the Planning Secretary. The Staging Report must be submitted for the approval of the Planning Secretary no later than two weeks 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).	Sighted Staging Report dated 6/9/19 (SSD 9354 - A9 - Staging - Staging Report - DoE - V3 - 190918). Sighted DPIE letter signed 20/09/19 approving the Staging Report Revision 3. DPIE letter notes that the Staging Report approval relates to Stage 1 only and that an updated Staging report must be resubmitted to the DPIE for approval; 2 weeks prior to the commencement of Stage 2 works.	Compliance with condition has been demonstrated.			
A10	A Staging Report prepared in accordance with condition A9 must: (a) if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; (b) if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant); (c) specify how compliance with conditions will be achieved across and between each of the stages of the project; and (d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.	Sighted DPIE letter signed 20/09/19 approving the Staging Report Revision 3. Approval letter notes that the Staging Report Revision 3 has been reviewed by SINSW and contains the information required by the CoC.	Compliance with condition has been demonstrated.			

A11	Where staging is proposed, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	Stage 1 currently underway with stage 2 not yet commenced.	Compliance with condition has been demonstrated.			
A12	Where staging is proposed, the terms of this approval that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	Achievement demonstrated by findings of this audit.	Compliance with condition has been demonstrated.			
Staging, Combining and Updating Strategies, Plans, Programs or Drawings						
A13	With the approval of the Planning Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan, program or architectural/design plans applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan, program or drawing required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan, program or drawing required by this consent (to ensure the strategies, plans, programs and drawings required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	NA	Not triggered - Project has not been staged.			
A14	If the Planning Secretary agrees, a strategy, plan, program or drawing may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	NA	Not triggered - Project has not been staged.			
A15	If approved by the Planning Secretary, updated strategies, plans, programs or drawings supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan, program or drawing.	NA	Not triggered - Project has not been staged.			
Structural Adequacy						
A16	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. Note: Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	Structural drawings submitted to the Certifying Authority (Group DLA) on the 11/09/19. DLA affirmed all approved conditions requiring certification have been accepted by approved certifier on 19/09/19.	General compliance with this condition has been demonstrated. Confirmation of "as built" compliance has not been sighted and would be of value in advance of the pre-occupation compliance report.			
External Walls and Cladding						
A17	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	Sighted correspondence from Certifying Authority (Group DLA) dated 19/09/19 confirming that construction of the external walls as detailed, and the provided design statement complies with the requirements of the BCA. Sighted email from DoE to the Department dated 20/09/19 confirming the Certifying Authority's satisfaction of the cladding on external walls.	General compliance with this condition has been demonstrated.			
Windows						
A18	Windows on the northern elevation of Building B3 must be opaque, or translucent to maintain the amenity of residential land uses to the north.	NA	Not triggered - Building B3 forms part of stage 2 works.			
Applicability of Guidelines						
A19	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	NA	Not triggered - Note			
A20	Consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	NA	Not triggered - no directions received from Secretary.			

	Monitoring and Environmental Audits					
A21	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. 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.	Procedural condition.	This audit is aligned to the requirements of Div 9.4 of Part 9 of the EP&A Act. Div 9.4 is applicable to SSD developments. This IEA and its scope is aligned to the requirements of s9.39(2); s9.39(3); s9.40; s9.41(2); s9.42(1); and s9.42(2) of the EP&A Act.			
	Access to Information					
A22	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: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in condition A2 of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent; (v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint; (viii) a complaints register, updated monthly; (ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report; (x) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary.	Reviewed applicant's website on 03/03/20 (https://www.schoolinfrastructure.nsw.gov.au/projects/j/jordan-springs-new-primary-school.html). Documents available include: - Staging Report (CoC A9) - Development Consent (CoC A2 & A22) - Approved plans (CoC A22) - Complaints Register (CoC A22) - CEMP Richard Crookes Construction CEMP dated 16/09/19, reference 1157-JSP5-CEMP (Rev3) (CoC B13) - Pre-construction Compliance Report September 2019 (CoC B35). - Community Updates Feb, May, Sept 2019 and Feb 2020. Contact details are provided for feedback and enquiries. Complaints register (update dated 08/01/20) is accessible for review.	Review of the SINSW website identified the following publication issues: (iii) The most recent versions of the CEMP (Rev 5 dated 7 November 2019) is not on the Schools Infrastructure Project website. The website displays Rev 3 dated 16/09/19. (ix) requires audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report. The Independent Audit completed by Aspect Environmental dated 12/11/19 and the Applicant's response to the recommendations in Aspects audit are not available on the Schools Infrastructure Project Website.			
	Compliance					
A23	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.	Site induction for project personnel states that works to be undertaken in accordance with all environmental mitigation measures in the CEMP. Identifies copy available on site in office for reference. Toolbox Meeting minutes and sign-on sheets dated 25/2/20 sighted which addresses targetted requirements of CoC and CEMP documentation.	General compliance with this condition has been demonstrated.			
	Incident Notification, Reporting, Response					
A24	The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident.	NA	Not triggered - No incident notifications to the Planning Secretary to date.			
A25	Subsequent notification must be given, and reports submitted in accordance with the requirements set out in Appendix 1.	NA	Not triggered - See CoC A24			
	Non-Compliance Notification					
A26	The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Planning Secretary in writing to compliance@planning.nsw.gov.au within seven days after they identify any non-compliance.	NA	Not triggered - No non-compliance notifications to the Planning Secretary to date.			
A27	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.	NA	Not triggered - See CoC A26.			
A28	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	NA	Not triggered - See CoC A26.			

Revision of Strategies, Plans and Programs						
A29	<p>Within three months of:</p> <p>(a) the submission of a compliance report under condition B34;</p> <p>(b) the submission of an incident report under condition A24;</p> <p>(c) the submission of an Independent Audit under condition C36;</p> <p>(d) the issue of a direction of the Planning Secretary under condition A2 which requires a review,</p> <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifying Authority must be notified in writing that a review is being carried out.</p>	<p>(a) sighted Pre-Construction Compliance Report (B34) dated 20/9/19. (https://www.schoolinfrastructure.nsw.gov.au/projects/j/jordan-springs-new-primary-school.html).</p> <p>(b) NA</p> <p>(c) Independent Audit completed by Aspect Environmental on 12/11/19.</p> <p>(d) NA</p> <p>As per CoC A29 (d), strategies, plans and programs due to be revised within 3 months of (a), (b) or (c) occurring.</p> <p>Sighted CEMP Revision 3 dated 16/09/19 on School Infrastructure project site (https://www.schoolinfrastructure.nsw.gov.au/projects/j/jordan-springs-new-primary-school.html) and sighted during . CEMP Rev 5 dated 7/11/19 indicating that the CEMP had been reviewed and updated in response to the initial Independent Environmental Audit site inspection (25/10/19) and prior to the completion of the Audit report for submission (12/11/19).</p>	<p>Pre-construction compliance report dated 20/9/19.</p> <p>A review of the CEMP was undertaken following the 25/10/19 Independent Audit on site. DPIE was notified of an amendment to the CEMP identified on 18/10/19 by SINSW, and responses to DPIE review on 5/11/19.</p> <p>Notification to DPIE of an intended update to the CEMP in response to the Independent Audit advised by TSA to DPIE and SINSW 5/11/19. CEMP Rev 5 update is dated 7/11/19. Independent audit completion date is 12/11/19.</p> <p>Notification to the Planning Secretary and the Certifying Authority was required by completion of a compliance report under B34 due by 20/12/19. Effective notification on 5/11/19.</p>			
A30	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary and Certifying Authority.</p> <p>Where revisions are required, the revised document must be submitted to the Planning Secretary and Certifying Authority for information within six weeks of the review.</p> <p>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</p>	NA	Not triggered - No revisions to date.			
Part B - Prior to Commencement of Construction						
Notification of Commencement						
B1	The Applicant must notify the Planning Secretary in writing of the dates of commencement of physical work and operation at least 48 hours before those dates.	<p>Sighted notification from DoE to the Department dated 11/09/19 for the commencement of works in accordance with Condition B1 (Ref DOC19/782290).</p> <p>Date for commencement of physical SSD works is identified as week of 23/09/19.</p>	Assessed in Initial Construction Environmental Audit as compliant.			
B2	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.	<p>Sighted notification from DoE to the Department (23/09/19) for the commencement of works in accordance with Conditions.</p> <p>Date for commencement of physical SSD works is identified as 25/09/19.</p>	Assessed in Initial Construction Environmental Audit as compliant.			
Certified Drawings						
B3	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifying Authority structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.	Structural drawings submitted to the Certifying Authority (Group DLA) on the 11/09/19. DLA affirmed all approved conditions requiring certification have been accepted by approved certifier on 19/09/19.	Assessed in Initial Construction Environmental Audit as compliant.			
External Walls and Cladding						
B4	Prior to the commencement of construction, the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use or used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the BCA. The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it.	<p>Sighted correspondence from Certifying Authority (Group DLA) dated 19/09/19 confirming that construction of the external walls as detailed, and the provided design statement complies with the requirements of the BCA.</p> <p>Sighted email from DoE to the Department dated 20/09/19 confirming the Certifying Authority's satisfaction of the cladding on external walls.</p>	Assessed in Initial Construction Environmental Audit as compliant.			
Protection of Public Infrastructure						
B5	<p>Prior to the commencement of construction, the Applicant must:</p> <p>(a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;</p> <p>(b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</p> <p>(c) submit a copy of the dilapidation report to the Planning Secretary, Certifying Authority and Council for information.</p>	<p>(a) Sighted consultation record with Endeavour Energy, Jemena, NBN and Sydney Water.</p> <p>(b) Sighted Dilapidation Report dated 31/01/19, report number 116038, Con Thanopoulos.</p> <p>(c) A copy of the dilapidation report was submitted to the Department on the 16/09/19 (letter dated 11/09/19 DOC 19/782328). A copy was submitted to Penrith City Council and the Certifying authority on the 29/08/19.</p>	Assessed in Initial Construction Environmental Audit as compliant.			

Pre-Construction Dilapidation Report						
B6	Prior to the commencement of construction, the Applicant must submit a pre-commencement dilapidation report to Council, and the Certifying Authority. The report must provide an accurate record of the existing condition of adjoining private properties, and Council assets that are likely to be impacted by the proposed works.	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>(b) Sighted Dilapidation Report dated 31/01/19, report number 116038, Con Thanopoulos.</p> <p>(c) A copy of the delapidation report was submitted to the Department on the 16/09/19 (letter dated 11/09/19 DOC 19/782328). A copy was submitted to Penrith City Council and the Certifying authority on the 29/08/19.</p> <p>(d) Sighted dilapidation report for 39 Barrow Circuit, Jordan Springs (Tyrrells Property Inspections Pty Ltd, 20/08/19 Report No. 119955). Sighted dilapidation report for 27 Barrow Circuit, Jordan Springs (Tyrrells Property Inspections Pty Ltd, 02/09/19 Report No. 119949).</p>	Assessed in Initial Construction Environmental Audit as compliant.			
Unexpected Contamination Procedure						
B7	Prior to the commencement of construction, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition B13 and where any material identified as contaminated is to be disposed off-site, the disposal location and results of testing submitted to the Planning Secretary prior to its removal from the site.	<p>Sighted Unexpected Finds Protocol prepared by WSP dated 23 August 2019 (PS114979-CLM-LTR-UFP RevA.docx).</p> <p>Appendix K of the CEMP contains the Unexpected Finds Protocol.</p> <p>Refer Condition C29 for during construction phase implementation.</p>	<p>No evidence was provided to verify that the disposal location and results of testing for the unexpected asbestos find in spoil were submitted to the Planning Secretary prior to its removal from the site.</p> <p>This pre-construction obligation was met and is therefore recorded as a compliance. Noting the replicate condition for works during construction on C29 is recorded as a non-compliance.</p>			
Community Communication Strategy						
B8	<p>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. The Community Communication Strategy must:</p> <p>(a) identify people to be consulted during the design and construction phases;</p> <p>(b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development;</p> <p>(c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development;</p> <p>(d) set out procedures and mechanisms:</p> <p>(i) through which the community can discuss or provide feedback to the Applicant;</p> <p>(ii) through which the Applicant will respond to enquiries or feedback from the community; and</p> <p>(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.</p>	<p>Sighted notification from DoE to the Department dated 11/09/19 for the commencement of works in accordance with Condition B1 (Ref DOC19/782290). Date for commencement of physical SSD works is identified as week of 23/09/19.</p> <p>Community Communication Strategy (dated September 2019) was submitted to Planning Secretary on the 16/09/19.</p> <p>(a) Section 5, Stakeholders, p10</p> <p>(b) Section 6.1, General community input, p12 and Table 3, School Infrastructure NSW Communication Tools, pp13-17</p> <p>(c) Section 6.1, General community input, p12 and Table 3, School Infrastructure NSW Communication Tools, pp13-17</p> <p>(d) Section 4 (Project Reference Group), Pg 8</p> <p>(i) Section 8.5, Enquires and complaints management, p20</p> <p>(ii) Section 8.5, Enquires and complaints</p> <p>(iii) Section 8.5.1. Disputes involving compensation and rectification, p22</p>	<p>Sighted Jordan Springs Public School Project Update dated February 2020 on the Schools Infrastructure Project Website.</p> <p>General compliance with this condition has been demonstrated.</p>			
Ecologically Sustainable Development						
B9	<p>Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either:</p> <p>(a) registering for a minimum 4-star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifying Authority; or</p> <p>(b) seeking approval from the Planning Secretary for an alternative certification process.</p>	<p>DoE requested an extension on 16/09/19 from the Department for registration of Green Star Certification. DoE requested a 6 month extension to assess an alternate ESD certification pathway.</p> <p>Department approved a 3 month extension from the date of commencement of construction works - due 18/12/19.</p> <p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p>	<p>DPIE letter dated 20/09/19 granted an extension of 3 months to assess an alternative ESD certification pathway. Certification was due 18/12/19.</p> <p>No evidence was provided to verify ESD is being achieved by either minimum 4-star Green Star with the Green Building Council Australia, or an alternative certification process.</p>			
Access for People with Disabilities						
B10	The works that are the subject of this application must be designed and constructed to provide access and facilities for people with a disability in accordance with the BCA. Prior to the commencement of construction, the Certifying Authority must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.	<p>Sighted submission of access design certificate to the Certifying Authority (Group DLA) on 19/09/19.</p> <p>Confirmation from Certifying Authority that the access design certificate satisfies the criteria in BCA for the purposes of Section 6.28 of the EP&A Act received 19/09/19.</p>	Assessed in Initial Construction Environmental Audit as compliant.			

	Outdoor Lighting					
B11	Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifying Authority that all outdoor lighting 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.	Sighted submission of outdoor lighting design certificate to the Certifying Authority dated 10/09/19. Certifying Authority confirmed satisfaction with submission on 19/09/19.	Assessed in Initial Construction Environmental Audit as compliant.			
	Environmental Management Plan Requirements					
B12	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: (a) detailed baseline data; (b) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; (c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; (d) a program to monitor and report on the: (i) impacts and environmental performance of the development; (ii) effectiveness of the management measures set out pursuant to paragraph (c) above; (e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; (f) a program to investigate and implement ways to improve the environmental performance of the development over time; (g) a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements; and (h) a protocol for periodic review of the plan. Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans	Project management plans reviewed as part of this audit include: - B13 Construction Environmental Management Plan (Richard Crookes Construction, 16/09/19 reference 1157-JSPS-CEMP (Rev3). - Construction noise and vibration management sub-plan - Construction waste management sub-plan - Construction soil and water management sub-plan - Unexpected finds protocol for contamination - Unexpected finds protocol for Aboriginal and non-Aboriginal heritage	Assessed in Initial Construction Environmental Audit as compliant.			
	Construction Environmental Management Plan					
B13	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the satisfaction of Certifying Authority and provide a copy to the Planning Secretary and to Council. The CEMP must include, but not be limited to, the following: (a) Details of: (i) hours of work; (ii) 24-hour contact details of site manager; (iii) management of dust and odour to protect the amenity of the neighbourhood; (iv) stormwater control and discharge; (v) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; (vi) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting; (vii) community consultation and complaints handling; (b) Construction Traffic and Pedestrian Management Sub-Plan (see condition B15); (c) Construction Noise and Vibration Management Sub-Plan (see condition B16); (d) Construction Waste Management Sub-Plan (see condition B17); (e) Construction Soil and Water Management Sub-Plan (see condition B18); (f) Flood Emergency Response (see condition B19); (g) an unexpected finds protocol for contamination and associated communications procedure; (h) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and (i) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site.	Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2. Sighted Richard Crookes Construction CEMP dated 16/09/19, reference 1157-JSPS-CEMP (Rev3). Sighted correspondence (Ref: GroupDLA-GCOR-000032) from the Certifying Authority (Group DLA) dated 19/09/19 confirming satisfaction with the CEMP as per CoC B13 in advance of Construction works commencing on 25/09/19. DoE email dated 20/09/19 identifies submission of the CEMP to the Department (Ref DOC19/789952). TSA email dated 19/09/19 identifies submission of the CEMP to Council.	Assessed in Initial Construction Environmental Audit as compliant.			
B14	The Applicant must not commence construction of the development until the CEMP is approved by the Certifying Authority and a copy submitted to the Planning Secretary.	Sighted correspondence (Ref: GroupDLA-GCOR-000032) from the Certifying Authority (Group DLA) dated 19/09/19 confirming satisfaction with the CEMP as per CoC B13 in advance of Construction works commencing on 25/09/19. DoE email dated 20/09/19 identifies submission of the CEMP to the Department (Ref DOC19/789952).	Assessed in Initial Construction Environmental Audit as compliant.			

B15	<p>The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council; (c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; (d) detail heavy vehicle routes, access and parking arrangements; (e) include a Driver Code of Conduct to: (i) minimise the impacts of earthworks and construction on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; and (iv) ensure truck drivers use specified routes; (f) include a program to monitor the effectiveness of these measures; and (g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes. 	Sighted correspondence (Ref: GroupDLA-GCOR-000032) from the Certifying Authority (Group DLA) dated 19/09/19 confirming satisfaction with the CEMP and associated plans listed in SSD Condition B13 (including Sub Plans) and B14.	Assessed in Initial Construction Environmental Audit as compliant.			
B16	<p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced noise expert; (b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); (c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; (d) include strategies that have been developed with the community for managing high noise generating works; (e) describe the community consultation undertaken to develop the strategies in condition B8; (f) include a complaints management system that would be implemented for the duration of the construction; and (g) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the management measures in accordance with Condition B12(d). 	Sighted correspondence (Ref: GroupDLA-GCOR-000032) from the Certifying Authority (Group DLA) dated 19/09/19 confirming satisfaction with the CEMP and associated plans listed in SSD Condition B13 (including Sub Plans) and B14.	Assessed in Initial Construction Environmental Audit as compliant.			
B17	<p>The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; (b) removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works. 	Sighted correspondence (Ref: GroupDLA-GCOR-000032) from the Certifying Authority (Group DLA) dated 19/09/19 confirming satisfaction with the CEMP and associated plans listed in SSD Condition B13 (including Sub Plans) and B14.	Assessed in Initial Construction Environmental Audit as compliant.			
B18	<p>The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction; (c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (d) detail all off-Site flows from the Site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI). 	Sighted correspondence (Ref: GroupDLA-GCOR-000032) from the Certifying Authority (Group DLA) dated 19/09/19 confirming satisfaction with the CEMP and associated plans listed in SSD Condition B13 (including Sub Plans) and B14.	Assessed in Initial Construction Environmental Audit as compliant.			
B19	<p>The Flood Emergency Response Sub-Plan (FERSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) address the provisions of the Floodplain Risk Management Guideline (OEHL, 2007); (c) include details of: (i) the flood emergency responses for both construction and operation phases of the development; (ii) predicted flood levels; (iii) flood warning time and flood notification; (iv) assembly points and evacuation routes; (v) evacuation and refuge protocols; and (vi) awareness training for employees and contractors, and students. 	Sighted correspondence (Ref: GroupDLA-GCOR-000032) from the Certifying Authority (Group DLA) dated 19/09/19 confirming satisfaction with the CEMP and associated plans listed in SSD Condition B13 (including Sub Plans) and B14.	Assessed in Initial Construction Environmental Audit as compliant.			

	Construction Parking					
B20	Prior to the commencement of construction, the Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.	Observation during site walkover indicated that site personnel are parking within the site boundary in the designated carpark at the entry point to site.	Compliance with condition has been demonstrated.			
	Road and Pedestrian Infrastructure					
B21	Prior to the commencement of construction, a section 138 Roads Act 1993 application, including payment of application and inspection fees together with any applicable bonds, must be lodged and approved by Penrith City Council (being the Roads Authority for any works required in a public road). These works may include but are not limited to the following works in Cullen Avenue and Lakeside Parade: (a) vehicular crossings (including kerb reinstatement of redundant vehicular crossings); (b) concrete footpaths and or cycleways; (c) road opening for utilities and stormwater (including stormwater connection to Council roads and other Council owned drainage); (d) road occupancy or road closures; (e) placement of hoardings, structures, containers, waste skips, signs etc. in the road reserve; and (f) temporary construction access. Note: Engineering plans must be prepared in accordance with the development consent, Council's Design Guidelines for Engineering Works for Subdivisions and Developments, Engineering Construction Specification for Civil Works, Austroads Guidelines, and best engineering practice and a copy provided to Council. All works must be carried out in accordance with the Roads Act 1993 approval, the development consent, including the stamped approved plans, and Council's specifications, guidelines and best engineering practice.	NA	Not triggered - Items detailed in B21 were undertaken as part of the Early Works DA. Section 138 will be submitted if required.			
B22	Within 3 months of commencement of construction, detailed plans must be prepared in consultation with and approved by Council for the provision of the following: (a) pick-up/drop-off zone in Cullen Avenue; (b) raised pedestrian 'Children's Crossing' platform in Cullen Avenue; (a) a raised pedestrian crossing, with associated street lighting complying with AS 1158 and Council Street Lighting Policy; (b) pavement marking and signage for "No Stopping" zones; (c) school "Bus Zone" signage with boarding points and bus shelters for two buses complying with Disability Discrimination Act and Council requirements; (d) "Kiss and Ride" drop-off/pick-up zone signage; (e) short term parking signage; and (f) any other traffic and parking restrictions in the public roads or car parks. All works are subject to a 12 month defect liability period.	Sighted meeting minutes dated 11/10/19 from meeting held on 03/10/19 in regard to the proposed public domain works and in reference to SK01-2 JSPS Public Domain Scope Rev A document (190918 DK SK01 Rev A). Sighted email from Council dated 2/12/19 approving the signage and line-marking plans. Email correspondence from Council dated 9/1/20 identifies public domains works application yet to be lodged with Council. Consultation has been evidenced, but no approval from Council for the full suite of public domain works has been sighted.	Compliance with condition has not been demonstrated.			
B23	Prior to the commencement of construction, an Infrastructure Restoration Bond must be lodged with Council for development involving works around Council's Public Infrastructure Assets. The bond must be lodged with Council prior to commencement of any works on site. The bond and applicable fees are in accordance with Council's adopted Fees and Charges. An application form together with an information sheet and conditions are available on Council's website. Contact Council's City Works Department on 4732 7777 or visit Council's website for more information.	Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2. Sighted letter from Richard Crookes Construction confirming the lodgement of the Infrastructure Restoration Bond with the Penrith City Council dated 16/09/19 (Bond Number 2019090387).	Assessed in Initial Construction Environmental Audit as compliant.			
B24	Prior to the issue of a Roads Act Approval, a Performance Bond is to be lodged with Council for any construction works within the road reserve areas of Cullen Avenue and Lakeside Parade. The value of the bond shall be determined in accordance with Council's adopted Fees and Charges. Note: Contact Council's Development Engineering Department on 4732 7777 for further information relating to bond requirements.	Sighted lodgement of performance bond with Penrith City Council dated 03/03/30.	Compliance with condition has been demonstrated.			
	Site Contamination					
B25	Prior to the commencement of construction, a site auditor accredited under the Contaminated Land Management Act 1997 must be engaged to: (a) review the adequacy of the site investigations, Unexpected Finds Protocol, any remedial works or management plan required; (b) review all Unexploded Ordinance (UXO) related assessments and management plans, and the UXO Unexpected Finds Protocol; During construction, the site auditor must: (c) provide an updated Section A site audit statement (SAS) and accompanying site audit report (SAR) certifying suitability of the land for the proposed land use; and (d) ensure that the updated site audit statement referred to in paragraph (c) above clearly indicates that it applies to the whole of the development site.	Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2. Sighted letter of confirmation (dated 11/09/19) from Richard Crookes Construction stating that Kylie Lloyd of ZOIC Environmental Pty Ltd has been engaged to: - review the adequacy of the site investigations, Unexpected Finds Protocol, any remedial works or management plan required; - review all Unexploded Ordinance (UXO) related assessments and management plans, and the UXO Unexpected Finds Protocol - provide an updated Section A site audit statement (SAS) and accompanying site audit report (SAR) certifying suitability of the land for the proposed land use; - ensure that the updated site audit statement referred to in paragraph (c) above clearly indicates that it applies to the whole of the development site. Letter contains confirmation that Kylie Lloyd is an accredited site auditor under the Contaminated Lands Management Act 1997 as listed on the NSW EPA's online register as at 10th September 2019.	The SAS & SAR are still progressing. Compliance with condition has been demonstrated.			
B26	The Applicant must implement site auditor recommendations and requirements.	NA	Not triggered - The SAS & SAR are still progressing.			

	Stormwater Management Systems					
B27	<p>Prior to the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifying Authority. The system must:</p> <p>(a) be designed by a suitably qualified and experienced person(s);</p> <p>(b) be generally in accordance with the conceptual design in the EIS;</p> <p>(c) be in accordance with applicable Australian Standards;</p> <p>(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;</p>	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>The Stormwater Management Plan was submitted to the Certifying Authority (Group DLA) on the 10/09/19.</p> <p>Sighted correspondence dated 19/09/19 verifying the Certifying Authority's satisfaction with the design in accordance with condition B27.</p>	Assessed in Initial Construction Environmental Audit as compliant.			
	Operational Waste Storage and Processing					
B28	<p>Prior to the commencement of construction, the Applicant must obtain agreement from Council for the design of the operational waste storage area (where waste removal will be undertaken by Council). Where waste removal will be undertaken by a third party, the design of the operational waste storage area must be in accordance with Council's standards. Evidence of the design and Council endorsement (where relevant) must be provided to the Certifying Authority.</p>	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>Waste collection is undertaken by a third party.</p> <p>Sighted correspondence dated 18/09/19 from Group GSA confirming that the design as documented in the drawings and documents (refer Dwg No: L-JS-2001 Rev E) meets the requirements of the aforementioned Waste Management Report and Council's guidelines outlined in section 3.4.</p> <p>Sighted correspondence dated 18/09/19 from Richard Crookes Construction to the Certifying Authority (Group DLA) seeking acceptance.</p>	Compliance with condition has been demonstrated.			
	Operational Noise – Design of Mechanical Plant and Equipment					
B29	<p>Prior to installation of mechanical plant and equipment, the Applicant must incorporate the noise mitigation recommendations in the Environmental Noise Assessment prepared by Acoustic Logic dated 24 May 2019, into the detailed design drawings. The Certifying Authority must verify that all noise mitigation measures have been incorporated into the design to ensure the development will not exceed the recommended operational noise levels identified in the Environmental Noise Assessment prepared by Acoustic Logic dated 24 May 2019.</p>	<p>Sighted letter from Acoustic Logic dated 22/11/19 (20190240.2/0612A/R1/VF) confirming that the enclosures and mechanical plant have been designed to ensure the recommended operational noise levels in the ALC report dated 24 May 2019 will not be exceeded.</p> <p>Sighted confirmation of acceptance (email dated 17/02/20) from the Certifying Authority that all noise mitigation measures have been incorporated into the design.</p>	Compliance with condition has been demonstrated.			
	Rainwater Harvesting					
B30	<p>Prior to the commencement of construction unless otherwise agreed to by the Planning Secretary, the Applicant must ensure that a rainwater reuse/harvesting system for the development is prepared for the site. A rainwater reuse plan must be prepared and certified by an experienced hydraulic engineer.</p>	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>A Rainwater Harvesting Plan has been prepared by Neinhardt, and submitted to the Planning Secretary on the 29/08/19. The provided document contains a statement speaking to the qualifications of the hydraulic engineer "I am an appropriately qualified and competent person in this area being listed in the National Professional Engineers Register (NPER) and as such can certify that the design and performance of the design systems comply with the above and which are detailed on the following drawings. "</p>	Assessed in Initial Construction Environmental Audit as compliant.			
	Operational Access					
B31	<p>Prior to the commencement of construction, the Applicant must submit design plans to the satisfaction of the relevant roads authority which demonstrate that the proposed accesses to the development are designed to accommodate the turning path of the largest vehicle required to access the site.</p>	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>Sighted TSA Meeting Minutes dated 5/09/19 indicate that plans for the swept paths of the largest refuse vehicle were provided to Penrith Council at the beginning of the meeting.</p>	Assessed in Initial Construction Environmental Audit as compliant.			
	Operational Car Parking and Service Vehicle Layout					
B32	<p>Within three months of the commencement of construction, compliance with the following requirements must be submitted to the satisfaction of the Certifying Authority:</p> <p>(a) all construction vehicles must enter and leave the Site in a forward direction;</p> <p>(b) a minimum of 65 on-site carparking spaces including two accessible spaces for use during operation of the development and designed in accordance with the latest versions of AS2890.1 and AS2890.6;</p> <p>(c) the swept path of the longest vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the Site, must be in accordance with AS2890.2; and</p> <p>(d) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed.</p>	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>Sighted letter dated 10/09/19 from the Certifying Authority that the proposed design and the car park, loading dock and access driveway are in accordance with AS2890.1, AS2890.2, AS2890.6, and conditions highlighted within the development consent (B31 and B32).</p>	Compliance with condition has been demonstrated.			

	Public Domain Works					
B33	Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifying Authority that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from Council to the Certifying Authority.	NA	Not triggered - public domains work have not yet commenced.			
	Compliance Reporting					
B34	No later than 48 hours before the date notified for the commencement of construction, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Planning Secretary and the Certifying Authority.	Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2. Sighted correspondence dated 23/09/19 (DOC19/782366) of submission of the Compliance Monitoring and Reporting Program (Compliance Monitoring Program - TSA - v2 - 190916) to the Department. Sighted correspondence dated 17/09/19 of submission of the Compliance Monitoring and Reporting Program to the Certifying Authority.	Assessed in Initial Construction Environmental Audit as compliant.			
B35	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary and notify the Planning Secretary and the Certifying Authority in writing at least seven days before this is done.	NA	Not triggered - No Compliance Report was due during the auditable period.			
Part C - During Construction						
	Site Notice					
C1	A site notice must be prominently displayed at the boundaries of the site during construction for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifying Authority and Structural Engineer is to satisfy the following requirements: (a) minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size; (b) the notice is to be durable and weatherproof and is to be displayed throughout the works period; (c) the approved hours of work, the name of the site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and (d) the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the site is not permitted.	Project site notices were observed at the project site boundaries during the site visit.	Compliance with condition has been demonstrated.			
	Operation of Plant and Equipment					
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.	Crookes Construction' plant and equipment certification stickers were observed on multiple items of plant. Daily pre-start log books are filled in for plant and equipment on the project.	Compliance with condition has been demonstrated.			
	Construction Hours					
C3	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 6pm, Mondays to Fridays inclusive; and (b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays.	Access to the project site during the approved hours was observed in the security sign-in sheet. No complaints received to date.	Compliance with condition has been demonstrated.			
C4	Construction activities may be undertaken outside of the hours in condition C3 if required: (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or (c) where the works are inaudible at the nearest sensitive receivers; or (d) where a variation is approved in advance in writing by the Planning Secretary or their nominee if appropriate justification is provided for the works.	Delivery of modules is completed out of hours, as required by RMS. Times for Heavy Vehicle Combination travel occur out of hours - See Appendix B of NHVR Permit. Sighted DoE 'Works Notification Out of Hours Deliveries' dated 25/09/19.	Compliance with condition has been demonstrated.			
C5	Notification of such construction activities as referenced in Condition C4 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	Notification of out of hours works has been provided, dated 25/09/19. Sighted out of hours deliveries works notification: Oversize vehicles are scheduled to deliver large materials to the school site between midnight and 5am on the following dates: • Wednesday 2 October • Wednesday 9 and Thursday 10 October • Wednesday 16 and Thursday 17 October • Wednesday 23 and Thursday 24 October Notification was completed via a door knock, completed 25/9/19.	Compliance with condition has been demonstrated.			
C6	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: (a) 9am to 12pm, Monday to Friday; (b) 2pm to 5pm Monday to Friday; and (c) 9am to 12pm, Saturday.	NA	Not triggered - No rock breaking, rock hammering, sheet piling or pile driving has occurred on the project. Screw piling only. No complaints pertaining to excessive noise activities on the project to date.			

	Implementation of Management Plans					
C7	The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	<p>Adequacy of mitigation measures implemented for the project is being assessed as part of this audit.</p> <p>No evidence to suggest the construction of the development is not being carried out in accordance with the CEMP and Sub-plans.</p> <p>Some management plan requirements identify maintenance of records/logs, equipment inspections or survey results where these have not been specifically triggered during the current phase of construction.</p> <p>For example traffic management logs, reviews of traffic setups and conditions on site (effectively managed in absence of sighted documentation) and noise survey results (no complaints triggering need for monitoring).</p>	Compliance with condition has been demonstrated.			
Construction Traffic						
C8	All construction vehicles are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site before stopping.	All construction vehicles were observed contained within the project site boundary for the duration of the site audit.	Compliance with condition has been demonstrated.			
Hoarding Requirements						
C9	The following hoarding requirements must be complied with: (a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and (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.	<p>No third party advertising or graffiti were observed on project site hoarding. Site Manager confirmed no graffiti or vandalism recorded to date.</p> <p>No hoardings installed over Council footways or road reserves.</p>	Compliance with condition has been demonstrated.			
No Obstruction of Public Way						
C10	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.	All public ways in proximity of the project site were observed to be free of obstructions.	Compliance with condition has been demonstrated.			
Construction Noise Limits						
C11	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan	<p>Sighted Appendix G CEMP - Construction Noise and Vibration Management Sub Plan, Acoustic Logic (Rev 3 09/09/19).</p> <p>No complaints have been identified as being received from local residents for any perceived excessive noise generating activities from the project to date.</p>	Compliance with condition has been demonstrated.			
C12	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C3.	<p>The sighted project site security sign-in sheet indicates that the site is being accessed during approved hours only.</p> <p>No complaints have been identified as being received from local residents for any perceived excessive noise generating activities outside of the approved construction hours.</p>	Compliance with condition has been demonstrated.			
C13	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.	<p>No complaints have been identified as being received from local residents for any perceived excessive noise generating activities from the project to date.</p> <p>No tonal alarm were observed during the site audit.</p>	Compliance with condition has been demonstrated.			
C14	Any noise generated during construction of the development must not be offensive noise within the meaning of the Protection of the Environment Operations Act 1997 or exceed approved noise limits for the site.	No complaints have been identified as being received from local residents for any perceived excessive noise generating activities from the project to date.	Compliance with condition has been demonstrated.			
C15	The Applicant must schedule intra-day 'respite periods' for construction activities identified in the Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009) as being particularly annoying or intrusive to noise sensitive receivers. These activities are to be carried out after 8am only and over continuous periods no exceeding three hours (with at least a one hour respite every three hours).	<p>Acoustic fencing has been taken down to allow progression of site works. The respite period between 1200-1300 is still being implemented for any machinery over 5 tonne.</p> <p>No complaints have been identified as being received from local residents for any perceived excessive noise generating activities from the project to date.</p>	Compliance with condition has been demonstrated.			
Vibration Criteria						
C16	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time).	There has been no identification of recorded incidents or complaints by local residents regarding perceived vibration impact from construction activities.	Compliance with condition has been demonstrated.			
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.	<p>Crookes Construction confirmed that no vibratory compactor activity has been undertaken on the project.</p> <p>No complaints have been identified as being received from local residents for any perceived excessive vibration generating activities from the project to date.</p>	Compliance with condition has been demonstrated.			
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 B16 of this consent.	NA	Not triggered - C16 and C17 conditions apply.			

	Tree Protection					
C19	For the duration of the construction works: (a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; (b) all street trees must be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council; and (c) 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.	Site management stated that no street trees have been trimmed or removed. No tree damage or removal of street trees was evident during the site inspection on 26/02/20.	Compliance with condition has been demonstrated.			
	Air Quality					
C20	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Stockpile stabilisation was observed on a large (to be retained onsite) stockpile located to the north of the site during the site audit. Topsoil stockpiles are stabilised with vegetation (albeit weeds) and sediment fencing installed. No visible dust emissions were noted during the site inspection.	Compliance with condition has been demonstrated.			
C21	During construction, the Applicant must ensure that: (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Stockpiles on the site were observed to be damp from recent rainfall. No trucks were observed leaving site during the audit. There was no visible mud tracking from the project site onto the public road network.	Compliance with condition has been demonstrated.			
	Erosion and Sediment Control					
C22	All erosion and sediment control measures, must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment.	ErSed controls were observed to be in place and effective. An environmental inspection checklist was sighted.	Compliance with condition has been demonstrated.			
	Imported Soil					
C23	The Applicant must: (a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Planning Secretary and Certifying Authority upon request.	Sighted letter report from Construction Sciences dated 10/06/19 "ENM Exemption for Primary Scalp Material from Lynwood Quarry ". "This letter serves to confirm that the Primary Scalp Material excavated from and processed at the Lynwood Quarry, NSW meets the criteria for Excavated Natural Material (ENM) exemption. " Sighted 'Tracking for Material Imported to Site' Richard Crookes Constructions. Log includes date, material type, truck rego, volume, source and docket number. Last import 28/11/19. Records pertain to DGS 40 (road base), DGB 20 and quarry 10mm fines.	Compliance with condition has been demonstrated.			
	Disposal of Seepage and Stormwater					
C24	Adequate provisions must be made to collect and discharge stormwater drainage during construction of the building to the satisfaction of the principal certifying authority. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	Site stormwater is not connected to Council stormwater drainage system. All 'dirty' water is directed to a sediment basin located in the south east corner of the site. A contractor (Unique Wastewater) manages treatment (flocculation), testing and discharge. Sighted Richard Crookes Construction CEMP dated 16/09/19, reference 1157-JSPS-CEMP (Rev3). Sighted diary entry dated 10/02/20 detailing order of flocculant agent (6 x 20ltr drums). Sighted invoice from UWS for delivery of 6 x 25 ltr flocculant drums.	Compliance with condition has been demonstrated.			
	Unexpected Finds Protocol – Aboriginal Heritage					
C25	The Applicant must prepare and implement an Aboriginal Heritage Management Plan (AHMP) to reduce the risk of impacting Aboriginal heritage and to provide guidance on the appropriate protocol to follow if unanticipated Aboriginal Artefacts are found. The AHMP must include but not be limited to the following: (a) be prepared by a suitably qualified person whose appointment has been endorsed by the Planning Secretary; (b) be prepared in consultation with registered Aboriginal parties; and (c) include a description of the measures that would be implemented for: (d) a contingency plan and reporting procedure if previously unidentified Aboriginal artefacts are found or Aboriginal skeletal material is discovered; (e) ensuring workers on-site receive suitable heritage inductions prior to carrying out any development and that suitable records are kept of these inductions; and (f) ongoing consultation with registered Aboriginal parties during the implementation of the plan.	a) Sighted letter from the Department dated 19/09/19 endorsing Ms Anthea Vella as a qualified person for preparation of AHMP. Sighted AHMP prepared by Biosis, dated 16/08/19 (30341.30325.Jordan.Springs.PS.AHMP.FIN.201907016).	No unexpected finds to date. Compliance with condition has been demonstrated.			

C26	In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Environment, Energy and Science Group of the Department of Planning, Industry and Environment (former NSW Office of Environment and Heritage) (EESG) and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and EESG to develop and implement management strategies for all objects/sites. Works shall only recommence with the written approval of EESG.	NA	Not triggered - No new objects discovered.			
Unexpected Finds Protocol – Historic Heritage						
C27	If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and the NSW Heritage Division contacted. Depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area. Works may only recommence with the written approval of the NSW Heritage Division.	NA	Not triggered - No unexpected archaeological relics to date.			
Site Contamination						
C28	The Unexploded Ordinance Management Protocol must be reviewed by a site auditor accredited under the Contaminated Land Management Act 1997 to confirm that: (a) there has been an appropriate level of site investigation in relation to unexploded ordinance; and (b) the site is suitable for its proposed use.	NA	Not triggered - In progress - not yet complete.			
C29	Prior to the commencement of construction, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with Condition B13 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>Unexpected finds protocol for contamination included as Appendix K in CEMP (Richard Crookes Construction CEMP dated 16/09/19, reference 1157-JSPS-CEMP (Rev3).</p> <p>An unexpected asbestos find was discovered in soil. A material adverse site condition notice and waste classification report was issued to TSA within Aconex correspondence RCC-GCOR-000915.</p> <p>An asbestos in soil clearance certificate was issued to RCC on 26/2/20. The clearance certificate identifies removal works being undertaken between 17/2/20 and 21/2/20 to remove approximately 1,200 m3 of stockpiled soil. Section 2 of the Asbestos Clearance Certificate report identifies "Regulator notification form available and viewed?" with a response "NA".</p> <p>Refer to response in CoC B7.</p>	Condition expectation is identical to CoC B7, although B7 relates to prior to construction and C29 relates to the construction phase. Only a single non-compliance in respect of the notification expectations and it should be recorded in the construction phase of the project. Hence B7 is identified as a compliance as it addresses the pre-construction phase.			
Waste Storage and Processing						
C30	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.	<p>Waste storage areas across the site were observed to be in good order and well maintained. Waste generally contained within open skips or lidded bins.</p> <p>Signage and demarcation of waste storage areas was in place.</p> <p>It is observed that one skip bin was at capacity and required removal. Some longer items in skip bins protruded beyond the lip and required attention to avoid hazards.</p>	Compliance with condition has been demonstrated.			
C31	All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	Sighted waste diversion report for 3 September 2019 (PS114979-CLM-LTR-SP14.docx). The report was prepared by WSP, waste classified as GENERAL SOLID WASTE – NON- PUTRESCIBLE.	Compliance with condition has been demonstrated.			
C32	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.	<p>Concrete washout completed adjacent to works, allowed to dry then removed from site.</p> <p>No evidence of concrete wash out or disposal onsite during site inspection on 26/02/20.</p> <p>There have been no reported incidents of concrete waste or rinse water entering stormwater drains or any watercourses.</p>	Compliance with condition has been demonstrated.			
Independent Environmental Audit						
C33	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an Independent Audit Program or commencement of an Independent Audit.	Independent auditor (Richard Johnson, Aspect Environmental Pty Limited) was agreed to in writing by DPIE on 18/09/19 (Kate Moore A/Principal Compliance Officer (Social Infrastructure).	Compliance with condition has been demonstrated.			

C34	<p>Prior to the commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.</p>	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>An Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) was prepared (Aspect Environmental Pty Limited, Rev 1, dated 19/09/19).</p> <p>Sighted correspondence dated 20/09/19 of submission of Independent Audit Program to the Department.</p> <p>Sighted correspondence dated 19/09/19 of submission of Independent Audit Program to the Certifying Authority.</p>	Assessed in Initial Construction Environmental Audit as compliant.			
C35	<p>Table 1 of the Independent Audit Post Approval Requirements (Department 2018) is amended so that the frequency of audits required in the construction phase is:</p> <p>(a) An initial construction Independent Audit must be undertaken within eight weeks of the notified commencement date of construction; and</p> <p>(b) A subsequent Independent Audit of construction must be undertaken no later than six months from the date of the initial construction Independent Audit.</p> <p>In all other respects Table 1 remains the same. The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least 4 weeks' notice to the applicant of the date upon which the audit must be commenced.</p>	<p>Addressed within the preparation of this current independent audit scope.</p> <p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>The initial construction independent audit was finalised on 12/11/19.</p>	Compliance with condition has been demonstrated.			
C36	<p>Independent Audits of the development must be carried out in accordance with:</p> <p>(a) the Independent Audit Program submitted to the Planning Secretary and the Certifying Authority under condition C33 of this consent; and</p> <p>(b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).</p>	Addressed within the preparation of this current independent audit scope.	General compliance with this condition is demonstrated by this audit itself.			
C37	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must:</p> <p>(a) review and respond to each Independent Audit Report prepared under condition C34 of this consent;</p> <p>(b) submit the response to the Planning Secretary and the Certifying Authority; and</p> <p>(c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary and notify the Planning Secretary and the Certifying Authority in writing at least seven days before this is done.</p>	<p>Addressed as part of this audit scope. Applicant's response to be appended to the Final Audit Report.</p> <p>Compliance with subsequent elements subject to verification under future audits.</p>	The Independent Audit Report completed by Aspect Environmental in November 2019 and the Applicants Response Report are not available on the Schools Infrastructure Project website as per the requirements of C37 (c).			
Landscaping						
C39	<p>Within 3 months of the commencement of construction, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping works on-site, to the satisfaction of the Certifying Authority. The plan must:</p> <p>(a) provide for the planting of 55 trees indigenous to the local area including 25 trees of intermediate mature size up to 12m and 30 larger native trees with a minimum mature size of 15m and a potential mature size of 25m;</p> <p>(b) native trees to be planted on site must consist of advanced and established local native tree species with a minimum tree height of 2-2.5m and/or plant container pot size of 100 litres;</p> <p>(c) provide for the planting of street trees along the southern property boundary along Cullen Avenue and on the eastern side of Lakeside Parade. Species and spacing of trees are to be determined in consultation with Council; and</p> <p>(d) Conquest Couch, Santa Anna Couch or Nullarbor Couch must be used adjacent to the riparian corridor.</p>	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>Sighted email from Group DLA dated 25/02/20 confirming satisfaction with the Landscape Management Plan and CoC 39 requirements.</p> <p>A Tree Planting Strategy (L-5100 Rev C) prepared by Group GSA and dated 15/12/19 was sighted. This strategy addresses requirements of the condition, although demonstration of consultation with Council was not sighted (reference consultation expectations included in CoC A8)..</p>	<p>The Landscape Management Plan was required to be endorsed by the Certifying Authority within 3 months (12 weeks) of commencement of construction. The Certifying Authority (Group DLA) did not confirm their endorsement of the Landscape Management Plan until approximately 22 weeks after construction commenced.</p> <p>Additionally, no evidence of consultation with Council to determine species and spacing of trees was sighted, as required by CoC A8.</p>			
Appendix 1: Written Incident Notification and Reporting Requirements						
Appendix 1 (1)	<p>A written incident notification addressing the requirements set out below must be emailed to the Planning Secretary at the following address: compliance@planning.nsw.gov.au 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 A24 or, having given such notification, subsequently forms the view that an incident has not occurred.</p>	NA	Not triggered - None to date.			
Appendix 1 (2)	<p>Written notification of an incident must:</p> <p>(a) identify the development and application number;</p> <p>(b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);</p> <p>(c) identify how the incident was detected;</p> <p>(d) identify when the applicant became aware of the incident;</p> <p>(e) identify any actual or potential non-compliance with conditions of consent;</p> <p>(f) describe what immediate steps were taken in relation to the incident;</p> <p>(g) identify further action(s) that will be taken in relation to the incident; and</p> <p>(h) identify a project contact for further communication regarding the incident.</p>	NA	Not triggered - None to date.			
Appendix 1 (3)	<p>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.</p>	NA	Not triggered - None to date.			

Appendix 1 (4)	The Incident Report must include: (a) a summary of the incident; (b) outcomes of an incident investigation, including identification of the cause of the incident; (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) details of any communication with other stakeholders regarding the incident.	NA	Not triggered - None to date.			
Appendix 2: Advisory Notes						
	Long Service Levy					
AN1	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.	Documentation that the long service levy has been paid was sighted Receipt No. 00400340 dated 14/10/19.	Assessed in Initial Construction Environmental Audit as compliant.			
	Legal Notices					
AN2	Any advice or notice to the consent authority must be served on the Planning Secretary.	NA	Not triggered - No legal notices served.			
	Licences, permits, approvals and consents					
AN3	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.	Legal requirements register provided and sighted in CEMP. Legislation and its application to the project is included in Section 4 of the CEMP. Table 2 includes the required permits, licences and consents under the relevant Acts, regulation or policy.	Condition is generally compliant.			
	Road Design and Traffic Facilities					
AN4	All roads and traffic facilities must be designed to meet the requirements of Council. The necessary permits and approvals from the relevant road authority must be obtained prior to the commencement of road or pavement construction works.	NA	Not triggered - No road design or traffic facilities works have commenced.			
	Road Design and Traffic Facilities					
AN5	All roads and traffic facilities must be designed to meet the requirements of Council or TfNSW (RMS) (whichever is applicable). The necessary permits and approvals from the relevant road authority must be obtained prior to the commencement of road or pavement construction works.	NA	Not triggered - No road design or traffic facilities works have commenced.			
	Road Occupancy Licence					
AN6	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	Delivery of modules is completed out of hours, as required by RMS. Times for Heavy Vehicle Combination travel occur out of hours - See Appendix B of NHVR Permit. Sighted DoE 'Works Notification Out of Hours Deliveries' dated 25/09/19. Sighted Class 1 – Over Size/ Over Mass Mass or Dimension Exemption Permit Permit No 240041 v3.	General compliance with this condition has been demonstrated.			
	SafeWork Requirements					
AN7	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.	The site was observed to be well secured. Access to the site can only be gained by approved construction and delivery personnel with a sign-in process in place to record entry and exit from site.	General compliance with this condition has been demonstrated.			
	Hoarding Requirements					
AN8	The Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.	NA	Not triggered - no hoardings installed.			
	Handling of Asbestos					
AN9	The Applicant is to consult with SafeWork NSW concerning the handling of any asbestos waste that may be encountered during construction. The requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 – 'Transportation and management of asbestos waste' must also be complied with.	Sighted correspondence with SafeWork NSW detailing "The soil samples returned with no asbestos identified in any of the samples, and no respirable fibres detected. As a precaution, the soils are still getting disposed as asbestos waste under Class A controls, however the contractor does not hold an asbestos licence. I would consider the asbestos contamination as minor and not associated with any source of asbestos materials (non-friable or friable)." SafeWork NSW responded "Yes, that is fine. Safe working procedures are still being used and there is less than trace levels of asbestos (as per clause 419) ".	General compliance with this condition has been demonstrated.			
	Speed limit authorisation					
AN10	At least eight weeks prior to the commencement of operation, the Applicant must submit the following details to RMS and obtain authorisation to install School Zone signs and associated pavement markings, and / or removal / relocation of any existing Speed Limit signs: (a) a copy of the Conditions of Consent; (b) the proposed school commencement/opening date; (c) two sets of detailed design plans showing the following: (i) accurate Site boundaries; (ii) details of all road reserves, adjacent to the Site boundaries; (iii) all proposed access points from the Site to the public road network and any additional conditions imposed/proposed on their use; (iv) all existing and proposed pedestrian crossing facilities on the adjacent road network; (v) all existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings); and (vi) all existing and proposed street furniture and street trees.	NA	Not triggered - installation of School Zone Signs and/or relocation of existing signs or traffic has not commenced and/or approved.			

	Fire Safety Certificate					
AN11	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.	NA	Not triggered - Final safety Certificate has not been issued.			
	Utilities and Services					
AN12	Prior to construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Sighted various consultation records with Endeavour Energy, Jemena, NBN and Sydney Water.	Assessed in Initial Construction Environmental Audit as compliant.			
AN13	Prior to the commencement of construction of any utility 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	Sighted various consultation records with Endeavour Energy, Jemena, NBN and Sydney Water.	Assessed in Initial Construction Environmental Audit as compliant.			
AN14	Prior to the commencement of construction, the Applicant must consult with Endeavour Energy for all infrastructure requirements.	Sighted consultation record with Endeavour Energy dated 30/06/19 Ref: ULL2691-2017/03061/001 and 7/09/19.	Assessed in Initial Construction Environmental Audit as compliant.			
AN15	During construction, the Applicant must comply with the requirements of Endeavour Energy.	Sighted consultation record with Endeavour Energy dated 30/06/19 Ref: ULL2691-2017/03061/001 and 7/09/19.	Assessed in Initial Construction Environmental Audit as compliant.			
PART D - Prior to Commencement of Operation						
	Notification of Occupation					
D1	At least one month prior to 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.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	External Walls and Cladding					
D2	Prior to the commencement of operation, the Applicant must provide the Certifying Authority with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
D3	The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Post-construction Dilapidation Report					
D4	Prior to commencement of operation, the Applicant must engage a suitably qualified person to prepare a post-construction dilapidation report at the completion of construction. This report is: (a) to ascertain whether the construction created any structural damage to adjoining buildings or infrastructure. (b) to be submitted to the Certifying Authority. In ascertaining whether adverse structural damage has occurred to adjoining buildings or infrastructure, the Certifying Authority must: i) compare the post-construction dilapidation report with the pre-construction dilapidation report required by these conditions; and ii) have written confirmation from the relevant authority that there is no adverse structural damage to their infrastructure and roads. (c) to be forwarded to Council.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Protection of Public Infrastructure					
D5	Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development. Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions required by B5 of this consent.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Protection of Property					
D6	Unless the Applicant and the applicable owner agree otherwise, the Applicant must repair, or pay the full costs associated with repairing any property that is damaged by carrying out the development.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Utilities and Services					
D7	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.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Road and pedestrian infrastructure					
D8	Prior to the commencement of operation, infrastructure upgrades described in Condition B22 must be completed.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			

D9	<p>Prior to commencement of operation and upon completion of the works outlined in Condition B22 or connecting to a public road, a Road Safety Audit (RSA), as per the NSW Centre for Road Safety Guidelines for Road Safety Audit Practices and Austroads Guide to Road Safety Part 6: Road Safety Audit) must be undertaken in consultation with Council for all relevant sections of road utilised for bus and private vehicle pick-up and drop-off, any traffic management facilities, signage and line-marking. The Applicant must submit a copy of the plans to the Planning Secretary for information.</p> <p>The Applicant must address the findings of the RSA and the proposed measures mentioned above must incorporate any required modifications to address the findings, in consultation with Council.</p> <p>Note: Any RSA is to be undertaken by an independent TfNSW accredited auditor.</p>	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
Maintenance Bond						
D10	<p>Prior to the commencement of operation, a 12 month maintenance bond is to be submitted to Penrith City Council for all civil works within the road reserves at Cullen Avenue and Lakeside Parade. This bond will be refunded at the end of the 12 month defect liability period</p>	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
Works as Executed Plans						
D11	<p>Prior to commencement of operation, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifying Authority and to Council.</p>	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
Green Travel Plan						
D12	<p>Prior to the commencement of operation, a Green Travel Plan (GTP), must be submitted to the satisfaction of the Planning Secretary to promote the use of active and sustainable transport modes. The plan must:</p> <p>(a) be prepared by a suitably qualified traffic consultant in consultation with Penrith City Council and (Sydney Coordination Office) Transport for NSW (TfNSW);</p> <p>(b) include objectives and modes share targets (i.e. Site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP;</p> <p>(c) include specific tools and actions to help achieve the objectives and mode share targets;</p> <p>(d) include measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the GTP; and</p> <p>(e) include details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development.</p>	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
Operational Transport and Access Management Plan (OTAMP)						
D13	<p>Prior to the commencement of operation, an OTAMP is to be prepared by a suitably qualified person, in consultation with Council and Transport for NSW and submitted to the satisfaction of the Planning Secretary. The OTAMP must address the following:</p> <p>(a) detailed pedestrian analysis including the identification of safe route options – to identify the need for management measures such as staggered school start and finish times to ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish;</p> <p>(b) the location of all car parking spaces on the school campuses and their allocation (i.e. staff, visitor, accessible, emergency, etc.);</p> <p>(c) the location and operational management procedures of the drop-off and pick-up parking, including staff management/traffic controller arrangements;</p> <p>(d) the location and operational management procedures for the drop-off and pick-up of students by buses and coaches for excursions and sporting activities, including staff management/traffic controller arrangements;</p> <p>(e) delivery and services vehicle and bus access and management arrangements;</p> <p>(f) management of approved access arrangements;</p> <p>(g) potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing drop-off and pick-up zones;</p> <p>(h) car parking arrangements and management associated with the proposed use of school facilities by community members;</p> <p>(i) kerbside vehicle pick-up/drop-off management and orderly vehicle queuing;</p> <p>(j) maintaining bus accessibility and student waiting areas;</p> <p>(k) safe parent and student behaviour during pick-up/drop-off;</p> <p>(l) safe pedestrian movements to the school entrance, minimising vehicle-pedestrian</p>	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			

	School Zones					
D14	Prior to the commencement of operation, all required School Zone signage, speed management signage and associated pavement markings along Cullen Avenue and Lakeside Parade must be installed and handed over to TfNSW (RMS). Note: Any required approvals for altering public road speed limits, design and signage are required to be obtained from the relevant consent authority.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
D15	The Applicant must maintain records of all dates in relation to installing, altering and removing traffic control devices related to speed.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Mechanical Ventilation					
D16	Prior to the commencement of operation, the Applicant must provide evidence to the satisfaction of the Certifying Authority, that the installation and performance of the mechanical ventilation systems complies with: (a) AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and other relevant codes; and (b) any dispensation granted by Fire and Rescue NSW.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Operational Noise – Design of Mechanical Plant and Equipment					
D17	Prior to the commencement of operation, the Applicant must submit evidence to the Certifying Authority that the noise mitigation recommendations in the Environmental Noise Assessment dated May 2019 and prepared by Acoustic Logic and all reasonable noise mitigation measures have been incorporated into the design to ensure the development will not exceed the recommended operational noise levels identified in the Environmental Noise Assessment.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
D18	The Applicant must design, install and operate the school public address/bell system to ensure use of that system does not interfere unreasonably with the comfort and repose of occupants of nearby residences.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Car Parking Arrangements					
D19	Prior to the commencement of operation or other timeframe agreed in writing by the Planning Secretary, evidence must be submitted to the Planning Secretary that demonstrates that construction works associated with the proposed school have been completed and that the car parking facility is operational.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Road Damage					
D20	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.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Fire Safety Certification					
D21	Prior to the commencement of operation, 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.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Structural Inspection Certificate					
D22	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 satisfaction of the Certifying Authority. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the approval authority and the Council after: (a) the site has been periodically inspected and the Certifying Authority is satisfied that the structural works is deemed to comply with the final design drawings; and (b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Compliance with Food Code					
D23	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 Certifying Authority.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Stormwater Quality Management Plan					
D24	Prior to commencement of operation, an Operation and Maintenance Plan (OMP) is to be prepared submitted to the satisfaction of the Certifying Authority along with evidence of compliance with the OMP. The OMP must ensure the proposed stormwater quality measures remain effective and contain the following: (a) maintenance schedule of all stormwater quality treatment devices; (b) record and reporting details; (c) relevant contact information; and (d) Work Health and Safety requirements.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			

	Rainwater Harvesting					
D25	Prior to the commencement of operation, signed works-as-executed Rainwater Re-use Plan must be provided to the Planning Secretary and Certifying Authority.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Warm Water Systems and Cooling Systems					
D26	Prior to the commencement of operation, evidence from a suitably qualified person must be submitted to the Certifying Authority that demonstrates that the installation of warm water systems and water cooling systems (as defined under the Public Health Act 2010) has been undertaken in accordance with the Public Health Act 2010, Public Health Regulation 2012 and Part 1 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.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Outdoor Lighting					
D27	Prior to the commencement of operation, the Applicant must submit evidence from a suitably qualified practitioner to the Certifying Authority that demonstrates that installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers and: (a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and (b) has been mounted, screened and directed in such a manner that it does not create a	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Signage					
D28	Prior to the commencement of operation, way-finding signage and signage identifying the location of staff car parking must be installed.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
D29	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.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
D30	Prior to the commencement of operation, 'Do not drink' signage on non-potable water used for toilet flushing and to new hose taps and irrigation systems for landscaped areas must be	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Operational Waste Management Pla					
D31	Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Planning Secretary and Certifying Authority. The Waste Management Plan must: (a) detail the type and quantity of waste to be generated during operation of the development; (b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); (c) detail the materials to be reused or recycled, either on or off site; and (d) include the Management and Mitigation Measures included in Appendix W of the EIS.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
D32	The proponent be required ensure waste collection services are to be undertaken outside the hours of 7:30am and 6pm Monday to Friday.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Aboriginal Artwork					
D33	Prior to the commencement of operation, Aboriginal artwork is to be installed on the eastern façade of Building C.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Landscaping					
D34	Prior to the commencement of operation, the Applicant must prepare an Operational Landscape Management Plan to manage the revegetation and landscaping on-site, to the satisfaction of the Certifying Authority. The plan must (a) detail the species to be planted on-site; and (b) describe the ongoing monitoring and maintenance measures to manage revegetation and landscaping.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			
	Bicycle Parking and End-of-Trip Facilities					
D35	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 satisfaction of the Certifying Authority: (a) the provision of a minimum 60 bicycle parking spaces for staff, students and visitors; (b) the layout, design and security of bicycle facilities must comply with the minimum requirements of AS 2890.3:2015 Parking facilities - Bicycle parking, and be located in easy to access, well-lit areas that incorporate passive surveillance; (c) the provision of end-of-trip facilities for staff in accordance with the ESD Design & As Built rating tool; (d) appropriate pedestrian and cyclist advisory signs are to be provided; and (e) all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads' authority.	NA	Not triggered - will form part of independent environmental prior to commencement of operation audit scope.			

PART E - Post Occupation Conditions						
	Out of Hours Event Management Plan					
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) and submit it to the Council and Planning Secretary in consultation with Council. The plan must include the following: (a) the number of attendees, time and duration; (b) arrival and departure times and modes of transport; (c) where relevant, a schedule of all annual events; (d) demonstrate measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport); (e) details of the use of the school hall where applicable, restricting use before 8am and after 10pm on week days and until 6pm on Saturdays; (f) the hall doors remain closed during use; (g) restricting the use of the sporting facilities between 7am and no later than 6pm on week nights and between 8am and 6pm Saturdays; (h) measures to minimise localised traffic and parking impacts; and (i) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.	NA	Not triggered - will form part of independent environmental operation audit scope.			
E2	The Out of Hours Event Management Plan must be implemented by the Applicant for the duration of the identified events or use.	NA	Not triggered - will form part of independent environmental operation audit scope.			
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. The plan must include the following: (a) the number of attendees, time and duration; (b) arrival and departure times and modes of transport; (c) where relevant, a schedule of all annual events; (d) demonstrate measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport); (e) details of the use of the school hall and/or sporting facilities, where applicable, restricting use before 8am and after 10pm; (f) measures to minimise localised traffic and parking impacts; and	NA	Not triggered - will form part of independent environmental operation audit scope.			
E4	The Out of Hours Event Management Plan must be implemented by the Applicant for the duration of the identified community event or use.	NA	Not triggered - will form part of independent environmental operation audit scope.			
E5	The school hall and sporting facilities must not be used on Sundays and public holidays.	NA	Not triggered - will form part of independent environmental operation audit scope.			
	Operation of Plant and Equipment					
E6	All plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner.	NA	Not triggered - will form part of independent environmental operation audit scope.			
	Warm Water Systems and Cooling Systems					
E7	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.	NA	Not triggered - will form part of independent environmental operation audit scope.			
	Operational Transport and Access Management Plan (OTAMP)					
E8	The OTAMP(s) approved under Condition D13 (as revised from time to time) must be implemented by the Applicant for the life of the development.	NA	Not triggered - will form part of independent environmental operation audit scope.			
	Community Communication Strategy					
E9	The Community Communication Strategy, as approved by the Planning Secretary, must be implemented for a minimum of 12 months following the completion of construction.	NA	Not triggered - will form part of independent environmental operation audit scope.			
	Operational Noise Limits					
E10	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in the Environmental Noise Assessment for Jordan Springs Public School prepared by Acoustic Logic dated 24 May 2019.	NA	Not triggered - will form part of independent environmental operation audit scope.			
E11	The Applicant must undertake short term noise monitoring in accordance with the Noise Policy for Industry where valid data is collected following the commencement of use of each stage of the development. The monitoring program must be carried out by an appropriately qualified person and a monitoring report must be submitted to the Planning Secretary within two months of commencement use of each stage of the development to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in the Environmental Noise Assessment for Jordan Springs Public School prepared by Acoustic Logic dated 24 May 2019. 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.	NA	Not triggered - will form part of independent environmental operation audit scope.			

	Unobstructed Driveways and Parking Areas					
E12	All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.	NA	Not triggered - will form part of independent environmental operation audit scope.			
	Green Travel Plan					
E13	The Green Travel Plan required by condition D12 of this consent must be updated annually and implemented unless otherwise agreed by the Planning Secretary.	NA	Not triggered - will form part of independent environmental operation audit scope.			
	Ecologically Sustainable Development					
E14	Unless otherwise agreed by the Planning Secretary, within six months of commencement of operation, Green Star certification must be obtained demonstrating the development achieves a minimum 4-Star Green Star Design & As Built rating. If required to be obtained, evidence of the certification must be provided to the Certifying Authority and the Planning Secretary. If an alternative certification process has been agreed to by the Planning Secretary under Condition B9, evidence of compliance of implementation must be provided to the Planning Secretary and Certifying Authority.	NA	Not triggered - will form part of independent environmental operation audit scope.			
	Outdoor Lighting					
E15	Notwithstanding Condition D27, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.	NA	Not triggered - will form part of independent environmental operation audit scope.			
	Landscaping					
E16	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition C39 for the duration of occupation of the development.	NA	Not triggered - will form part of independent environmental operation audit scope.			

APPENDIX B – SITE AUDIT PHOTO LOG

JORDAN SPRINGS PRIMARY SCHOOL SSD 9354 THIRD PARTY AUDIT PHOTO LOG

Figure 1	Entrance to site Project information
Figure 2	Project contact details, PPE and permitted hours of work
Figure 3	Daily attendance register- visitors
Figure 4	Sediment control and water quality
Figure 5	Spill kit contents
Figure 6	Safety and environmental log book completed for plant
Figure 7	Entry/ exit point to site with rumble grid and wheel wash
Figure 8	Sediment protection at entrance to site
Figure 9	Site waste bins
Figure 10	Vegetated and stabilised stockpile
Figure 11	Dangerous goods storage
Figure 12	Effective erosion and sediment controls



Figure 1 Entrance to site Project information



Figure 2 Project contact details, PPE and permitted hours of work

23.2 Site Attendance and Emergency Roll - RCC

RCC is a Code Compliance Activity Date west coast building 24/05/2018

Visitors

Name	Signature	Company	Mon		Tue		Wed		Thu		Fri		Sat	
			W	SW	W	SW	W	SW	W	SW	W	SW	W	SW
Kaine Scoobie	[Signature]	VE lifting			✓	✓								
Mark Johnson	[Signature]	Simsco				✓								
Markus Poon	[Signature]	Est												
Robert Jones	[Signature]	Aspet				✓								
Mark Williams	[Signature]	"				✓								

Any other visitors: All SWNSW 10/245.

RICHARD CROOKES CONSTRUCTIONS PTY LTD ABN 55 001 375 286 1 Victoria Street
Level 3/5 Brookvale NSW 1500 (0847) 710 1000 Crown Point NSW 1500 P.O. Box 4700
Rise Date: May 2018

www.richardcrookes.com.au
Page 12 of 1

Figure 3 Daily attendance register- visitors

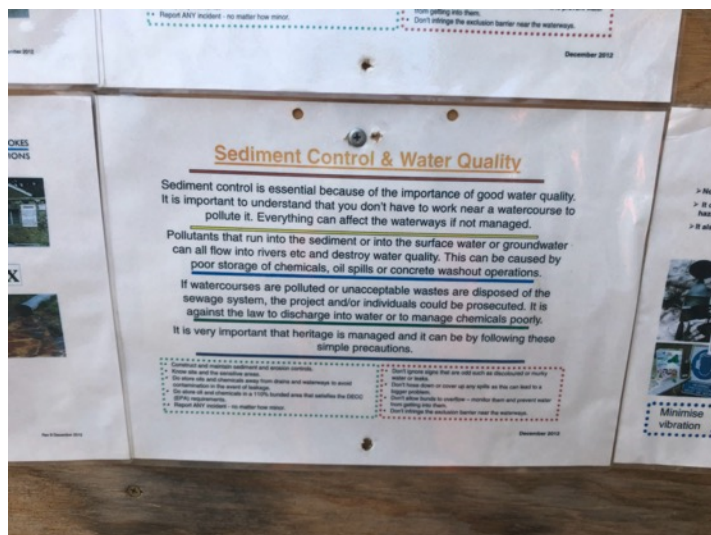


Figure 4 Sediment control and water quality



Figure 5 Spill kit contents

TELESCOPIC HANDLER ASSOCIATION OF AUSTRALIA

HOW TO USE THIS LOGBOOK

1 OPERATOR INSTRUCTIONS / SAFETY CHECK RECORD

Prior to each work shift, before using this Telescopic Handler (TSH), the operator (or competent person) must:

- Do all "Operator Safety Checks" (as shown on front cover) and record/sign below.
- Record any "Faults/Problems" found in "Section 2, Part A" (blue pages).

Date	Time	Operator Safety Checks Done By: Name of Operator or Competent person (Last name)	Safety Check Results: Tick (✓) if all okay Cross (X) if any faults or problems	Operator's Signature	Operator's Card: Ticket or Licence No., Certificate of Competence	Supervisor's Signature (if applicable)
24/2	7:00 am	Kay M	Operator or User should record any "Faults/Problems" found in "Section 2, Part A" (blue pages). IMPORTANT: ANY SAFETY RELATED FAULTS MUST BE REPORTED AND CORRECTED ON THE TELESCOPIC HANDLER WITHDRAWN FROM SERVICES.	[Signature]	4105472	
25						
26						
27						
28						
29						
30						
31						
32						
33						
34						
35						
36						
37						
38						
39						
40						
41						
42						
43						
44						
45						
46						
47						
48						
49						
50						

OPERATOR SAFETY CHECK RECORD 1

FAULTS / PROBLEMS & ACTION TAKEN 2

TELESCOPIC HANDLER MAINTENANCE & SAFETY CHECKS 3

Figure 6 Safety and environmental log book completed for plant



Figure 7 Entry/ exit point to site with rumble grid and wheel wash



Figure 8 Sediment protection at entrance to site



Figure 9 Site waste bins



Figure 10 Vegetated and stabilised stockpile



Figure 11 Dangerous goods storage



Figure 12 Effective erosion and sediment controls

APPENDIX C - CONSULTATION

Stakeholder Consultation to Inform Audit Scope

Subject: RE: SSD 9354 Independent Environmental Audit for Jordan Springs Public School
Date: Wednesday, 26 February 2020 at 9:15:12 am Australian Eastern Daylight Time
From: Michaela Burgess
To: Richard Johnson
Attachments: image001.jpg

Hi Richard,

Thank you for your email. The Department requests that all conditions of consent for SSD 9354 (as modified) are assessed and that the audit is conducted in accordance with the requirements of condition C36 of SSD 9354.

In addition to the above, please focus on assessing compliance with conditions B25 and C7 which relate to site contamination and implementation of management plans.

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

Kind regards

Michaela

Michaela Burgess

Senior Compliance Officer

Planning & Assessment | Department of Planning, Industry and Environment

T 02 8217 2055 | **M** 0427 749 597 | **E** michaela.burgess@planning.nsw.gov.au

Locked Bag 5022 | PARRAMATTA NSW 2124

www.dpie.nsw.gov.au

Please direct all email correspondence to compliance@planning.nsw.gov.au



**Planning,
Industry &
Environment**

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

From: Richard Johnson <richard@aspectenvironmental.com.au>

Sent: Tuesday, 25 February 2020 11:11 AM

To: Michaela Burgess <Michaela.Burgess@planning.nsw.gov.au>

Subject: SSD 9354 Independent Environmental Audit for Jordan Springs Public School

Hi Michaela,

I am preparing to undertake the second construction phase Independent Environmental Audit for SSD 9354.

In accordance with the Conditions of Consent and the Department's Independent Audit Post Approval Requirements (IAPAR), I am seeking response and feedback from the Department in terms of:

- Any directions issued to SINSW or their contractor in respect of the Site;
- Any perceived issues with respect to environmental performance of the Site;
- Compliance Reporting received for the project
- Any subsequent adjustment to the scope of the forthcoming audit beyond that identified within

Section 3.3 of the IAPAR

- Any consequent requirement for technical specialist review considered by the Department to inform the Independent Audit.

If you could review the above and provide written confirmation of any required scope adjustment, or absence thereof, it would be appreciated.

If you have any questions regarding the performance of the audit, please do not hesitate to call.

Kind regards

Richard Johnson
Director

0409051535
richard@aspectenvironmental.com.au

Suite 117, 25 Solent Circuit
Baulkham Hills NSW 2153

www.aspectenvironmental.com.au

Subject: Email Response to Planning Enquiry on SSD Determination : SSD 9354 - Jordan Springs Public School - Requirements from DPIE for Independent Environmental Audit and Liaison with Council

Date: Tuesday, 17 March 2020 at 12:28:09 pm Australian Eastern Daylight Time

From: Gavin Cherry

To: Richard Johnson

Attachments: image001.png, image002.jpg, image003.png, image007.jpg, image004.jpg

Morning Richard,

Councils Compliance Team has no record of any complaints or compliance investigations relating to this site and the works subject of the consent.

With respect to Condition C36 and C37, I have reviewed the consent from the Departments Major Project website and the consent version that is publicly available doesn't have any references to Council engagement. I noted however the conditions have errors in them and it could be that this is not the correct version of the consent that was issued. This should be taken up with the Department. Council's Environmental Management Team has not identified any matters specifically to address beyond the wording in the consent conditions however given the condition was imposed by the Department as the consent authority, verification of the matters below should be pursued with the Department directly.

Regards

Gavin

Gavin Cherry
Development Assessment Coordinator

E Gavin.Cherry@penrith.city
T [+612 4732 8125](tel:+61247328125) | F +612 4732 7958 | M _
PO Box 60, PENRITH NSW 2751
www.visitpenrith.com.au
www.penrithcity.nsw.gov.au

PENRITH
CITY COUNCIL



Follow us



From: Richard Johnson <richard@aspectenvironmental.com.au>
Sent: Tuesday, 25 February 2020 12:33 PM
To: Gavin Cherry <Gavin.Cherry@penrith.city>
Subject: SSD 9354 Independent Environmental Audit

EXTERNAL EMAIL: This email was received from outside the organisation. Use caution when clicking any links or opening attachments.

Hi Gavin,

We contacted you last year in respect of the Jordan Springs Public School construction. I am preparing to undertake the second construction phase Independent Environmental Audit for SSD 9354. The Independent Environmental Audit is undertaken in accordance with Condition of Consent C36 and C37.

In accordance with the Conditions of Consent and the Department's Independent Audit Post Approval Requirements (IAPAR), I am seeking response and feedback from the Council in terms of:

- Any directions issued to SINSW or their contractor in respect of the Site environmental performance or compliance issues;
- Any perceived issues with respect to environmental performance of the Site;
- Any complaints received. By Council in respect of the Site activity
- Any subsequent adjustment to the scope of the forthcoming audit beyond that identified within Section 3.3 of the IAPAR
 - Typical scope of the audit under the 3.3 of the IAPAR is replicated below for reference.
 - Any consequent requirement for technical specialist review considered by the Department to inform the Independent Audit.

If you could review the above and provide copies of any correspondence in respect of the site and/or written confirmation of any required scope adjustment, or absence thereof, it would be appreciated.

If you have any questions regarding the performance of the audit, please do not hesitate to call. If there is someone else in Council that this request should go to, please advise and we will forward accordingly.

Kind regards

Richard Johnson
Director

0409051535
richard@aspectenvironmental.com.au

Suite 117, 25 Solent Circuit
Baulkham Hills NSW 2153

www.aspectenvironmental.com.au

3.3 Audit scope

An Independent Audit must include:

1. an assessment of compliance with:
 - a. conditions of consent applicable to the phase of the development that is being audited;

- b. all post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
 - c. all environmental licences and approvals applicable to the development excluding environmental protection licences issued under the *Protection of the Environment Operations Act 1997*;
- 2. an assessment 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;
 - b. the physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;
 - 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 (if any);
- 4. a high-level review of the project's environmental management systems (if any), including assessment of any third party certification of them, the type, nature and scope of the systems having regard to the nature and scale of the development, and the implementation of the systems. It is not expected that an Independent Audit comprises a management system audit, however any key deficiencies identified in the system should be discussed;
- 5. a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- 6. any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

