



Independent Environmental Audit

JORDAN SPRINGS PRIMARY SCHOOL

1. REVISIONS

Revision	Date	Report No.	Description	Prepared by	Approved by
0C	07/11/2019	J1817T1191106.1	Issued to TSA for review and comment	Richard Johnson	Richard Johnson
1	12/11/2019	J1817T3191112.1	Final report issued to TSA	Richard Johnson	Richard 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 25 October 2019. 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: 12 November 2019

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 is 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 (05 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, opening meeting, site audit, closing meeting and post-site audit documentation review and follow up.

The site audit was conducted in October 2019, with site inspections and interviews undertaken on the 25 of October 2019. 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 with Penrith City Council was also undertaken. No adjustment was made to the audit scope and/or audit table due to no response from Council.

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 Conditions of Consent relevant to the current audit, the following findings of compliance were made:

- 83 compliant;
- 1 non-compliant; and
- 40 not triggered.

The non-compliance is summarised as:

1. 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.

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

As the initial construction audit for the development, and site as a whole, there were no previous audit findings to review.

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 that predicted impacts align with the nature scale and extent of works observed onsite. The observed exception to this related to construction traffic and on-street parking under the approved CEMP.

No clearly referenced environmental management system (EMS) was identifiable for the site or development. This absence potentially creates a gap in appreciation of management of risk and change management practice which in turn feeds down to documentation, communication, training and monitoring reporting requirements for the development.

The reviewed Construction Environmental Management Plan and Sub-plans were considered to generally be adequate for the nature of the site. Improvement opportunities were identified in respect of alignment of management plan documentation to the content expectations of the CoC e.g. management of stockpiles onsite.

Improvement opportunities and observations were identified pertaining to:

- alignment of Construction Environmental Management Plan and Sub-plans against the EIS requirements in particular waste and noise commitments;
- alignment of Construction Environmental Management Plan and Sub-plan commitments against CoC expectations e.g. stockpile management;
- provision of an additional spill kit at the contractors compound; and
- general waste skip bin inspection and capacity management.

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.

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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 independent auditor 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 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 store room 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
 - 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.

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 14 October 2019 and 12 November 2019, and site operations at the time of the site inspection undertaken on 25 October 2019.

2. AUDIT METHODOLOGY

2.1. Selection and Endorsement of Independent 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.

A request for 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 initial scope of auditing requirements for the project (as presented above in Section 1.8). This audit scope was discussed during the opening meeting on 25 October 2019. Attendees at the meeting were Jacqueline Sellen (TSA), Darryl Duffey (Richard Crookes Construction), Darren Vozzo (Richard Crookes Construction), Tom Hemmett (Richard Crookes Construction), Richard Johnson (Aspect) and Mathew Williams (Aspect).

Further development of the scope of the audit was considered through agency consultation 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.

No complaints have been received to date. No amendment was made to the audit scope following review of the complaint 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;

- interviews with construction project personnel;
- interviews 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 25 October 2019. The following personnel were interviewed:

- Darren Vozzo – Project Manager, Richard Crookes Construction;
- Darryl Duffey – WHSE Manager, 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 25 October 2019. The site inspection was accompanied by the Richard Crookes Construction site management team consisting of Darren Vozzo, Darryl Duffey, Kevin Morgan and Tom Hemmett.

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

Penrith City Council was contacted during the audit period. No response was received. As a result, no adjustment was made to the audit scope and/or audit table.

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

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:

- Jaqueline Sellen (Assistant Project Manager, TSA);
- Darren Vozzo (Project Manager, Richard Crookes Construction);
- Darryl Duffey (WHSE Manager, Richard Crookes Construction);
- Tom Hemmett (Lead Engineer, Richard Crookes Construction);
- Richard Johnson (Lead Auditor, Aspect); and
- Mathew Williams (Associate Director, Aspect).

2.9. Closing Meeting – Site Audit

The site audit closing meeting was held on the afternoon of 25 October 2019. The site audit closing meeting was attended by:

- Jaqueline Sellen (Assistant Project Manager, TSA);
- Darren Vozzo (Project Manager, Richard Crookes Construction);
- Darryl Duffey (WHSE Manager, Richard Crookes Construction);
- Tom Hemmett (Lead Engineer, Richard Crookes Construction);
- Richard Johnson (Lead Auditor, Aspect); and
- Mathew Williams (Associate Director, Aspect).

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

- initial findings – one non-compliance;
- review alignment of Construction Environmental Management Plan and Sub-plans against the EIS requirements in particular waste and noise commitments;
- provision of an additional spill kit at the contractors compound; and
- revision of general waste skip bin removal due to exceedance of volume limit.

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 7 November 2019 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 was provided on the 11/11/2019 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
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.	<p>Compliance Monitoring and Reporting Program submitted to the Department on 23/09/19.</p> <p>Sighted correspondence dated 3/10/19 DOC 19/868306 from DoE, notifying the Department that the PCCR will be made publicly available no sooner than 7 days following the submission of this letter. Noted that due to an email error, letter was only received by the Department on 14/10/19.</p> <p>Sighted correspondence dated 28/10/19 from TSA notifying the Certifying Authority that the PCCR is now publicly available on the project website.</p>	<p>Compliance with condition has not been demonstrated.</p> <p>Written notification to the Certifying Authority was not provided at least 7 days in advance of publishing the PCCR on the project website. It was provided post publishing on the publicly available project website.</p>	<p>Following finalisation of future Compliance Reports, the PCA and DPIE will be advised of SINSW's intent to publish on the school website.</p> <p>SINSW will ensure that the PCA and DPIE are advised 7 days in advance of the Construction Compliance Report being made public on the website.</p>	NA

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 25 October 2019. 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 is dated 16 September 2019.
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 (CSWMSP)	A CSWMSP was not reviewed as part of the audit. The management requirements associated with CoC B18 are addressed in: <ul style="list-style-type: none"> • CEMP Section 9 Stormwater control and discharge: Surface water and • CEMP Section 10 Measures of sediment control including procedures.
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	The landscape management is currently in progress with expected closeout for 23/12/19.

Table 2 Construction site document list

Document Details	Document Details & Observations
Project Incident Register	One incident registered. Dated 22/10/19 related to an oil leak on to the ground from a crane.
Traffic – Haul Routes	Sighted screenshot from TMO indicating approved haul routes.
Site Specific and CEMP Induction	Sighted induction register dated 14/10/19. Includes site induction number, name, company, induction date, industry induction number and medical conditions.
Plant and Equipment Induction Checklist	Sighted 25.3 Plant and Equipment Induction Checklist for Skyjack Scissor dated 24/10/19 No. 00016.

Document Details	Document Details & Observations
Safe Work Method Statements (SWMS)	Sighted SMWS for Wollongong Cranes – General crane works, dated 1/10/19 and signed by Eric Crockett. SWMS signed on to by 10 workers. Sighted SWMS Modscape for installation of modules dated and signed 1/10/19 by Jonathon Hayes.
Environmental Inspection Records	An environmental inspection checklist dated 27/09/19 was sighted. Signed by Darren Vozzo, PM. Four comments/actions noted. An environmental inspection checklist dated 14/10/19 was sighted. Completed by Chris Evans and Joe Hanna. Zero comments/actions noted.
Waste Disposal Records	Sighted waste diversion report for August and September 2019. The reports were prepared by Grass Hopper and included a break-down of waste received, recycled, total volume etc.
Wastewater Disposal Record	Sighted Unique WasteWater Services laboratory report for the sediment basin dated 14/08/19.

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	13	0	17
Part B - Prior to Commencement of Construction	36	29	1	6
Part C - During Construction	39	33	0	6
Appendix 1 Written Incident Notification and Reporting Requirements	4	0	0	4
Appendix 2 Advisory Notes	15	8	0	7
Total	124	83	1	40

A detailed summary of the 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 1 non-compliance was identified as summarised in Table 4.

Table 4 Summary of audit non-compliances

Approval (ID)	Audit findings
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 dated 3/10/19 DOC 19/868306 from DoE, 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, letter was only received by the Department on 14/10/19. However, TSA did not provide written notification to the Certifying Authority that the PCCR is now publicly available on the project website 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.

3.6. Previous Audit Recommendations

No previous audits were identified as having been completed for the project.

3.7. EMP, Sub-plans and Post Approval Documents

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

3.8. 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.

EMS Component	Requirement
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.

Findings from the audit concluded that no clearly referenced environmental management system (EMS) was identifiable for the site or development. This absence creates a potential gap in appreciation of management of risk and change management practice which in turn feeds down to documentation, communication, training and monitoring reporting requirements for the development. While risk assessment processes were evident on site, they remained a local assessment without input from, or feedback to, an EMS.

3.9. 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. Record of incidents/complaints.
Noise	Work hours are within approved hours. Noise mitigation evident. Record of incidents/complaints.
Land (ErSed)	Sediment and erosion controls are performing to control surface erosion and discharges from site within acceptable limits. Record of incidents/complaints.
Land (contam)	Any identified contaminant materials are effectively contained, controlled and removed from site for treatment and disposal. Record of any unexpected finds.
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. Record of incidents/complaints.
Waste	Containment and appropriate sorting of waste as appropriate. 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.
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 exhibited on site.

A comparison of predicted impacts documented in the EIS (Urbis 2019) to the actual impacts observed on site identified a variation in respect to construction worker traffic and parking arrangements.

Construction worker parking restrictions identified in the Construction Traffic Management Plan (Bitzios Consulting, 23/1/19 v. 4, Section 9.5, Appendix I of the Urbis EIS), while reflected in CoC B20, were not applied in the traffic management section of the approved CEMP and associated Construction Traffic Management Plan which identifies that on-street parking would be made available for the duration of construction (Jim's Traffic Control Construction Traffic & Pedestrian Management Plan 13/9/2019 v.2, Appendix F of the Richard Crookes CEMP 16/9/19 Rev 3).

Observations on site were that ample parking was available on the street along Lakeside Parade in the immediate vicinity of the construction access and towards the Jordan Springs commercial precinct.

Environmental controls implemented across the site were generally adequate in controlling environmental risks across the project site.

3.10. Consultation Outcomes

Stakeholders identified within Section 2.6 were contacted on the 29 October 2019, and feedback sought with regards to project performance. A summary of the feedback received is provided in Table 7.

Table 7 Agency consultation outcomes

Agency	Contact	Date	Comment	Audit Scope Consideration
Penrith City Council	Gavin Cherry	29/10/19	None received	All aspects of the construction delivery of the project

3.11. 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 25 October 2019 (last updated 19 September 2019). The register had no complaints recorded.

3.12. Incidents

A non-first aid incident register was provided by Richard Crookes Constructions post site audit. The register has one incident registered dated 22/10/19 related to an oil leak on to the ground from a crane.

3.13. Site Inspection

A site inspection as part of the audit was undertaken on 25 October 2019. During the site inspection, observations on the project's environmental performance were made and captured by site photos (Appendix B). The reviewing of documentation and EMS was also undertaken to identify potential environmental and operational risks.

Environmental performance was determined to be satisfactory, with good housekeeping exhibited.

3.14. 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 and how the project might demonstrate compliance with each of those conditions, documentation processes and site procedures pertaining to environmental management onsite and assessing and understanding of environmental risk and performance management onsite.

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.

3.15. 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.

3.16. Improvement Opportunities

A summary of improvement opportunities with respect to the CoCs are summarised in Table 8. Consideration of these suggestions may enhance the ability for demonstration of compliance in future audits.

Table 8 Improvement opportunities versus prescribed CoCs

Condition Reference	Improvement Opportunity
B16 & B17	Review alignment of Construction Environmental Management Plan and Sub-plans against the EIS requirements in particular waste and noise commitments.
B18	Review alignment of Construction Environmental Management Plan and Sub-plan commitments against CoC expectations e.g. stockpile management.

A summary of improvement opportunities for Environmental Aspects are provided in Table 9.

Table 9 Improvement opportunities versus environmental aspects

Environmental Aspect	Improvement Opportunity
Land (contamination)	Due to the distance to the spill kit located at the main site office, provision of an additional spill kit at the contractors compound would enable a more rapid and efficient response to any spills.
Waste	Revision of general waste skip bin inspection frequency and management due to potential volume exceedance.

3.17. Key Strengths

Throughout the audit process the site demonstrated a good level of housekeeping (site inspections). At no time during the site inspections were unsafe actions or activities, or activities presenting a material harm to the environment observed. This demonstrates the appropriate implementation adequacy of the management plans and the effectiveness of transition and ongoing communication between the construction delivery team and overall project management.

4. RECOMMENDATIONS

4.1. Non-Compliance Recommendations

A total of 1 non-compliance was identified. This non-compliance can be categorised under documentation preparation and submission outside the designated period/timeframe.

4.2. Improvement Opportunities Recommendations

A total of 2 improvement opportunities have been recommended against the prescribed CoCs. From a systemic perspective these improvement opportunities can be broadly classified into the following management area:

- ***Demonstrated consideration of reasonable and feasible controls.***

A review of management measures implemented to manage risk associated with environmental aspects on the project, identified an additional 2 improvement opportunities. These improvement opportunities were attributed to land contamination (spill kits) and waste.

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 25 October 2019.

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.

One non-compliance was identified in respect of CoC B35.

Improvement opportunities and observations were identified pertaining to:

- alignment of Construction Environmental Management Plan and Sub-plans against the EIS requirements in particular waste and noise commitments;
- alignment of Construction Environmental Management Plan and Sub-plan commitments against CoC expectations e.g. stockpile management;
- provision of an additional spill kit at the contractors compound; and
- general waste skip bin inspection and capacity management.

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

APPENDIX A

INDEPENDENT AUDIT – AUDIT PROTOCOL AND FINDINGS

Date of Audit 25/10/19
Auditor Richard Johnson
Location Jordan Springs Primary School

SSD 9354

Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	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.	Water cart use evident. Stockpiles on the site were observed to be dry - Dense clay material. The main large stockpile onsite was covered with geofabric material.	Compliance has been demonstrated.			
Noise	Work hours are within approved hours. Noise mitigation evident. Record of incidents/complaints.	The site access log book was observed to contain site entries before 07:00am, however it was identified that this represents site entry and makes allowance for pre-starts and toolbox talks in advance of commencement of actual site construction works.	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 separated 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. 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 is sorted by "Grasshopper" remotely from site.	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 observed. 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.			

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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. E.g. for Air quality (Pg. 22), monitoring includes "Implementation of visual monitoring of dust, material tracking, truck tarping, water spray use, exhaust plumes and stockpile covering. If unexpected fines protocol detects contaminants a review of airborne testing is to be undertaken".	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 three separate site inspections	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 (c) verified through site observation during site audit inspections on 25/10/19, site interviews on the same day with supervisory staff and HSE Officer and document review. Item (d) not verified at this stage of the development.	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			
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.	No project changes documented triggering an accordance or consistency assessment.	Not triggered			
	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	Not triggered			
	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.	No disputes relating to Stage 1 of the project have been communicated during this audit.	Not triggered			
	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 been demonstrated.			

Appendix A

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 letter dated 23/09/19 (FW_SSD 9354 - Condition B2 - Notification of Commencement of Stage 1) from Schools Infrastructure to the Department notifying that construction will commence on 25/09/19. 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 works planned for 2020.	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		
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		
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		
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.		
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.	Building B3 forms part of stage 2 works.	Not triggered.		

Appendix A

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		
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.	No directions issued by Planning Secretary.	Not triggered		
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.	NA	Not triggered		
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 23/10/19 (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 (CoC B13) - Pre-construction Compliance Report (CoC B35). - Community Updates Feb, May & Sept 2019 Contact details are provided for feedback and enquiries. Complaints register (update dated 18/09/19) is accessible for review.	Documentation publication requirements of the condition were being met at time of audit.		
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.	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.	No incident notifications to the Planning Secretary to date.	Not triggered		
A25	Subsequent notification must be given, and reports submitted in accordance with the requirements set out in Appendix 1.	NA - See CoC A24	Not triggered		
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.	No non-compliance notifications to the Planning Secretary to date.	Not triggered		
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 - See CoC A26	Not triggered		
A28	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	NA - See CoC A26	Not triggered		
Revision of Strategies, Plans and Programs					
A29	Within three months of: (a) the submission of a compliance report under condition B34; (b) the submission of an incident report under condition A24; (c) the submission of an Independent Audit under condition C36; (d) the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifying Authority must be notified in writing that a review is being carried out.	In progress - Due 16/12/19. CoC B34 - 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.	In progress - Not triggered.		

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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>	No revisions to date.	Not triggered			
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>	General compliance with this condition has been demonstrated.			
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>	General compliance with this condition has been demonstrated.			
	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.	General compliance with this condition has been demonstrated.			
	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>	General compliance with this condition has been demonstrated.			
	Protection of Public Infrastructure					
B5	Prior to the commencement of construction, the Applicant must: (a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (c) submit a copy of the dilapidation report to the Planning Secretary, Certifying Authority and Council for information.	(a) Sighted consultation record with Endeavour Energy, Jemena, NBN and Sydney Water. (b) Sighted Dilapidation Report dated 31/01/19, report number 116038, Con Thanopoulos. (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.	General compliance with this condition has been demonstrated.			
	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>	General compliance with this condition has been demonstrated.			
	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>	General compliance with this condition has been demonstrated.			

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	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.</p> <p>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>	General compliance with this condition has been demonstrated.		
B9	<p>Ecologically Sustainable Development</p> <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 18/09/19.</p> <p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p>	General compliance with this condition has been demonstrated.		
B10	<p>Access for People with Disabilities</p> <p>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>	<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>	General compliance with this condition has been demonstrated.		
B11	<p>Outdoor Lighting</p> <p>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.</p>	<p>Sighted submission of outdoor lighting design certificate to the Certifying Authority dated 10/09/19.</p> <p>Certifying Authority confirmed satisfaction with submission on 19/09/19.</p>	General compliance with this condition has been demonstrated.		
B12	<p>Environmental Management Plan Requirements</p> <p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <p>(a) detailed baseline data;</p> <p>(b) details of:</p> <p>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</p> <p>(ii) any relevant limits or performance measures and criteria; and</p> <p>(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;</p> <p>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</p> <p>(d) a program to monitor and report on the:</p> <p>(i) impacts and environmental performance of the development;</p> <p>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</p> <p>(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;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <p>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</p> <p>(ii) complaint;</p> <p>(iii) failure to comply with statutory requirements; and</p> <p>(h) a protocol for periodic review of the plan.</p> <p>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	<p>Project management plans reviewed as part of this audit include:</p> <ul style="list-style-type: none"> - 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 	General compliance with this condition has been demonstrated.		

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	Construction Environmental Management Plan					
B13	<p>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:</p> <p>(a) Details of:</p> <p>(i) hours of work;</p> <p>(ii) 24-hour contact details of site manager;</p> <p>(iii) management of dust and odour to protect the amenity of the neighbourhood;</p> <p>(iv) stormwater control and discharge;</p> <p>(v) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;</p> <p>(vi) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;</p> <p>(vii) community consultation and complaints handling;</p> <p>(b) Construction Traffic and Pedestrian Management Sub-Plan (see condition B15);</p> <p>(c) Construction Noise and Vibration Management Sub-Plan (see condition B16);</p> <p>(d) Construction Waste Management Sub-Plan (see condition B17);</p> <p>(e) Construction Soil and Water Management Sub-Plan (see condition B18);</p> <p>(f) Flood Emergency Response (see condition B19);</p> <p>(g) an unexpected finds protocol for contamination and associated communications procedure;</p> <p>(h) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and</p> <p>(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.</p>	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>Sighted Richard Crookes Construction CEMP dated 16/09/19, reference 1157-JSP5-CEMP (Rev3).</p> <p>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.</p> <p>DoE email dated 20/09/19 identifies submission of the CEMP to the Department (Ref DOC19/789952).</p> <p>TSA email dated 19/09/19 identifies submission of the CEMP to Council.</p>	Compliance with condition has been demonstrated.			
B14	<p>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.</p>	<p>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.</p> <p>DoE email dated 20/09/19 identifies submission of the CEMP to the Department (Ref DOC19/789952).</p>	Compliance with condition has been demonstrated.			
B15	<p>The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced person(s);</p> <p>(b) be prepared in consultation with Council;</p> <p>(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;</p> <p>(d) detail heavy vehicle routes, access and parking arrangements;</p> <p>(e) include a Driver Code of Conduct to:</p> <p>(i) minimise the impacts of earthworks and construction on the local and regional road network;</p> <p>(ii) minimise conflicts with other road users;</p> <p>(iii) minimise road traffic noise; and</p> <p>(iv) ensure truck drivers use specified routes;</p> <p>(f) include a program to monitor the effectiveness of these measures; and</p> <p>(g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.</p>	<p>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.</p>	Compliance with condition has been demonstrated.			
B16	<p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced noise expert;</p> <p>(b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);</p> <p>(c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</p> <p>(d) include strategies that have been developed with the community for managing high noise generating works;</p> <p>(e) describe the community consultation undertaken to develop the strategies in condition B8;</p> <p>(f) include a complaints management system that would be implemented for the duration of the construction; and</p> <p>(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).</p>	<p>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.</p>	Compliance with condition has been demonstrated.			
B17	<p>The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the following:</p> <p>(a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations;</p> <p>(b) removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works.</p>	<p>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.</p>	Compliance with condition has been demonstrated.			

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B18	The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following: (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.	Compliance with condition has been demonstrated.			
B19	The Flood Emergency Response Sub-Plan (FERSP) must address, but not be limited to, the following: (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.	Compliance with condition has been demonstrated.			
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 on local roads. Crookes Construction Project Manager confirmed during audit closeout meeting that construction personnel do park their vehicles on the surrounding local road network rather than onsite. Heavy vehicles (crane, truck and dog, water cart) were observed to be contained within the site boundary. However, upon arriving at site to complete the site inspection, a Hebel Bricks truck was observed parked at the entrance to site, on the street in a no standing area. Crookes Construction confirmed that the project does not utilise Hebel Bricks and may have been delivering to a building project located across Lakeside Parade.	Compliance with condition has not been demonstrated. Construction personnel private vehicles are parking on the surrounding local road network.			
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.	Not triggered. Items detailed in B21 were undertaken as part of the Early Works DA. Section 138 will be submitted if required.	Not triggered			
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; (c) a raised pedestrian crossing, with associated street lighting complying with AS 1158 and Council Street Lighting Policy; (d) pavement marking and signage for "No Stopping" zones; (e) school "Bus Zone" signage with boarding points and bus shelters for two buses complying with Disability Discrimination Act and Council requirements; (f) "Kiss and Ride" drop-off/pick-up zone signage; (g) short term parking signage; and (h) any other traffic and parking restrictions in the public roads or car parks. All works are subject to a 12 month defect liability period.	Currently in progress not complete. 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).	Not triggered - In progress. To be completed within 3 months of commencement of construction - due 18/12/19. Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.			

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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).	Compliance with condition has been demonstrated.			
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.	Not triggered - see condition B22. Performance Bond to be issued in relation to the Roads Act Approval when received.	Not triggered			
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 <i>Contaminated Lands Management Act 1997</i> as listed on the NSW EPA's online register as at 10th September 2019.	The SAS & SAR are still progressing. Additional site investigations are ongoing which will assist in the final stages of preparing the site audit report. Compliance with condition has been demonstrated.			
B26	The Applicant must implement site auditor recommendations and requirements.	NA	Not triggered			
Stormwater Management Systems						
B27	Prior to the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifying Authority. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the EIS; (c) be in accordance with applicable Australian Standards; (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines;	Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2. The Stormwater Management Plan was submitted to the Certifying Authority (Group DLA) on the 10/09/19. Sighted correspondence dated 19/09/19 verifying the Certifying Authority's satisfaction with the design in accordance with condition B27.	Compliance with condition has been demonstrated.			
Operational Waste Storage and Processing						
B28	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.	Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2. Waste collection is undertaken by a third party. 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. Sighted correspondence dated 18/09/19 from Richard Crookes Construction to the Certifying Authority (Group DLA) seeking acceptance.	Compliance with condition has been demonstrated.			
Operational Noise – Design of Mechanical Plant and Equipment						
B29	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.	Installation of mechanical plant has not commenced on site, therefore condition is not triggered. Prior to installation of the condenser units, the PCA's endorsement will be obtained.	Not triggered			

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	Rainwater Harvesting					
B30	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>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>	Compliance with condition has been demonstrated.			
	Operational Access					
B31	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>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>	Compliance with condition has been demonstrated.			
	Operational Car Parking and Service Vehicle Layout					
B32	Within three months of the commencement of construction, compliance with the following requirements must be submitted to the satisfaction of the Certifying Authority: (a) all construction vehicles must enter and leave the Site in a forward direction; (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; (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 (d) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed.	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>In progress.</p>	Not triggered - Identified Closeout Date of 23/12/19			
	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 - public domains work have not yet commenced.	Not triggered			
	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.	<p>Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2.</p> <p>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.</p> <p>Sighted correspondence dated 17/09/19 of submission of the Compliance Monitoring and Reporting Program to the Certifying Authority.</p>	Compliance with condition has been demonstrated.			
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.	<p>Compliance Monitoring and Reporting Program submitted to the Department on 23/09/19.</p> <p>Sighted correspondence dated 3/10/19 DOC 19/868306 from DoE, notifying the Department that the PCCR will be made publicly available no sooner than 7 days following the submission of this letter. Noted that due to an email error, letter was only received by the Department on 14/10/19.</p> <p>Sighted correspondence dated 28/10/19 from TSA notifying the Certifying Authority that the PCCR is now publicly available on the project website.</p>	<p>Compliance with condition has not been demonstrated.</p> <p>Written notification to the Certifying Authority was not provided at least 7 days in advance of publishing the PCCR on the project website. It was provided post publishing on the publicly available project website.</p>			

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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 each of the site visits.	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. A log book was sighted for Plant #40 during site audit inspection.	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 outside the approved time of 7am (Mon - Fri) has been observed in the security sign-in sheet. There is no indication that construction activities are commencing before the approved construction hours. With early access being undertaken to enable pre-start checks and toolbox talks in preparation of actual commencement of works. Analysis of noise monitoring to verify early access is not creating an issue would be beneficial. 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. 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.	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.	Not triggered			
	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).	Adequacy of mitigation measures implemented for the project is being assessed as part of this audit. No evidence to suggest the construction of the development is not being carried out in accordance with the CEMP and Sub-plans.	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 (excluding worker 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.	No third party advertising or graffiti were observed on project site hoarding. Site Manager confirmed no graffiti or vandalism recorded to date. No hoardings installed over Council footways or road reserves.	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.			

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	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	Sighted Appendix G CEMP - Construction Noise and Vibration Management Sub Plan, Acoustic Logic (Rev 3 09/09/19). 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.			
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.	The project site security sign-in sheet indicates that the site has been accessed before 07:00am on 21/10/19. This indicates personnel access as opposed to construction vehicles. No complaints have been identified as being received from local residents for any perceived excessive noise generating activities outside of the approved construction hours.	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.	No complaints have been identified as being received from local residents for any perceived excessive noise generating activities from the project to date. No tonal alarm were observed during the site audit.	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).	Acoustic fence installed at boundary to day care centre and a respite period between 1200-1300 has been implemented for any machinery over 5 tonne. 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.			
	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.	Crookes Construction confirmed that no vibratory compactor activity has been undertaken on the project. No complaints have been identified as being received from local residents for any perceived excessive vibration generating activities from the project to date.	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	NA			
	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 25/10/19.	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 covering 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 and sediment fencing installed. No visible dust emissions were noted during the site inspection. Water cart was in operation during site inspection.	Compliance with condition has been demonstrated.			

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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 dry. One large stockpile is covered with geofabric sheeting. Use of water as a suppressants was evidenced for localised activities during the audit. 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 dated 27/09/19 was sighted. Signed by Darren Vozzo, PM. Four comments/ actions noted. An environmental inspection checklist dated 14/10/19 was sighted. Completed by Chris Evans and Joe Hanna. Zero comments/ actions noted.	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 'Record Log - Import Material' Richard Crookes Constructions. Log includes details of date, material type, truck rego, volume, source and docket number. All records pertain to DGS 40 (road base).	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 Unique WasteWater Services laboratory report for the sediment basin dated 14/08/19. 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 (that includes all attachments including stormwater management plans prior to construction.)	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). The AHMP contains the following: (a) Confirmation of suitably qualified person - Section 1.6 (b) Evidence of consultation with registered Aboriginal Parties - Appendix B (c) NA (d) Contingency Plan- Section 6.2.4 & 6.2.5 (e) Heritage Inductions and tool box talks to manage heritage protection - Section 6.2.1 (f) Reference to ongoing consultation - 6.2.6	Compliance with condition has been demonstrated.			

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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 - No new objects discovered.	Not triggered			
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 - no unexpected archaeological relics to date.	Not triggered			
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.	In progress - not yet complete.	Not triggered			
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.	Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2. Unexpected finds protocol for contamination included as Appendix K in CEMP (Richard Crookes Construction CEMP dated 16/09/19, reference 1157-JSP5-CEMP (Rev3). No unexpected contamination material to date.	Compliance with condition has been demonstrated.			
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.	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. Signage and demarcation of waste storage areas was in place. It is noted that one skip bin was at capacity and required removal.	Compliance with condition has been demonstrated.			
C31	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	Sighted waste diversion report for August and September 2019. The reports were prepared by Grass Hopper and included a break-down of waste received, recycled component, classification, total volume etc.	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.	Concrete washout completed adjacent to works, allowed to dry then removed from site. No evidence of concrete wash out or disposal onsite during site inspection on 25/10/19. There have been no reported incidents of concrete waste or rinse water entering stormwater drains or any watercourses.	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	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.	Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2. 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). Sighted correspondence dated 20/09/19 of submission of Independent Audit Program to the Department. Sighted correspondence dated 19/09/19 of submission of Independent Audit Program to the Certifying Authority.	Compliance with condition has been demonstrated.			

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C35	Table 1 of the Independent Audit Post Approval Requirements (Department 2018) is amended so that the frequency of audits required in the construction phase is: (a) An initial construction Independent Audit must be undertaken within eight weeks of the notified commencement date of construction; and (b) A subsequent Independent Audit of construction must be undertaken no later than six months from the date of the initial construction Independent Audit. In all other respects Table 1 remains the same. The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least 4 weeks' notice to the applicant of the date upon which the audit must be commenced.	Addressed within the preparation of this current independent audit scope. Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2. The initial construction independent audit must be submitted to the Department by COB 18/11/19. The Site Audit commenced on 25/10/19.	Compliance with condition has been demonstrated.			
C36	Independent Audits of the development must be carried out in accordance with: (a) the Independent Audit Program submitted to the Planning Secretary and the Certifying Authority under condition C33 of this consent; and (b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).	Addressed within the preparation of this current independent audit scope. The Site Audit commenced on 25/10/19.	General compliance with this condition is demonstrated by this audit itself.			
C37	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C34 of this consent; (b) submit the response to the Planning Secretary and the Certifying Authority; and (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.	Addressed as part of this audit scope. Applicant's response to be appended to the Final Audit Report. Compliance with subsequent elements unable to be verified prior to finalisation of this audit.	General compliance with this condition is demonstrated by this audit itself.			
Landscaping						
C39	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: (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; (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; (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 (d) Conquest Couch, Santa Anna Couch or Nullarbor Couch must be used adjacent to the riparian corridor.	Date for commencement of physical SSD works is identified as 25/09/19 - CoC B2. In progress, to be closed out by 23/12/19.	Not triggered			
Appendix 1: Written Incident Notification and Reporting Requirements						
Appendix 1 (1)	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.	None to date.	Not triggered			
Appendix 1 (2)	Written notification of an incident must: (a) identify the development and application number; (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); (c) identify how the incident was detected; (d) identify when the applicant became aware of the incident; (e) identify any actual or potential non-compliance with conditions of consent; (f) describe what immediate steps were taken in relation to the incident; (g) identify further action(s) that will be taken in relation to the incident; and (h) identify a project contact for further communication regarding the incident.	None to date.	Not triggered			
Appendix 1 (3)	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	None to date.	Not triggered			
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.	None to date.	Not triggered			
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.	Compliant			
Legal Notices						
AN2	Any advice or notice to the consent authority must be served on the Planning Secretary.	NA	Not triggered			

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	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			
	Road Design and Traffic Facilities					
AN5	All roads and traffic facilities must be designed to meet the requirements of Council or TRNSW (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			
	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.	Compliance with 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			
	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.	NA	Not triggered			
	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			
	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			
	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.	General compliance with this condition has been demonstrated.			
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.	General compliance with this condition has been demonstrated.			
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.	General compliance with this condition has been demonstrated.			
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.	General compliance with this condition has been demonstrated.			

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
Figure 4	Risk report on site notice board
Figure 5	Risk notification board
Figure 6	Onsite copy of site induction
Figure 7	Sediment protection for stormwater grates
Figure 8	Stockpile stabilisation and erosion and sediment control
Figure 9	Entry/ exit point to site with rumble grid and wheel wash
Figure 10	Wheel wash down prior to leaving site
Figure 11	Sediment protection at entrance to site
Figure 12	Site waste bins
Figure 13	Site notice board describing waste management procedure
Figure 14	Water suppressant in use
Figure 15	Sediment basin
Figure 16	Site spill kit
Figure 17	Hydraulic oil spill in process of being remediated

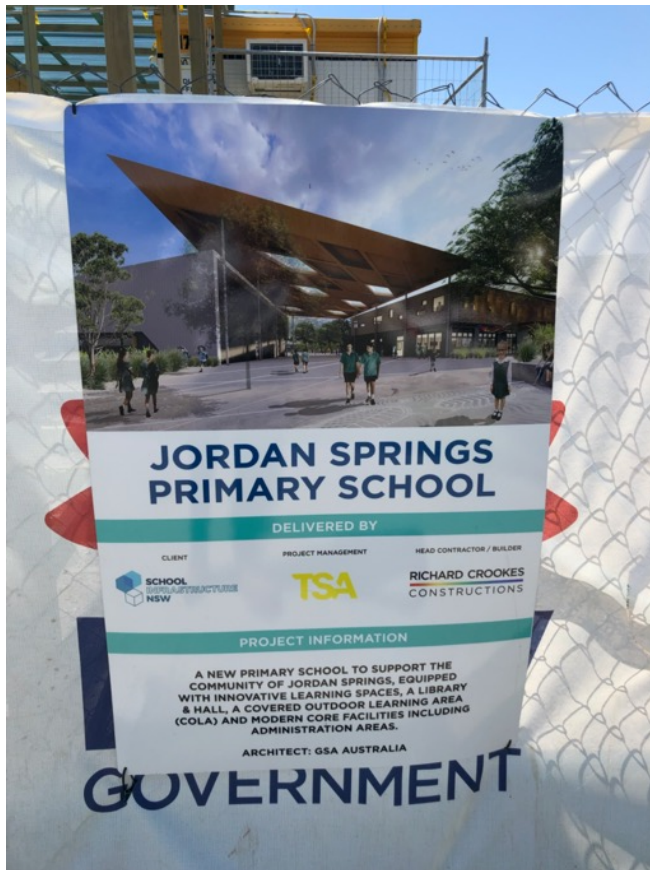


Figure 1 Entrance to site Project information



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

23.2 Site Attendance and Emergency

RCC is a Code Compliant Contractor **NSW RCC**

Project Name: **Modular Schools Jordan Springs** Date week commencing: **21/10/19**

Name	Signature	Company	Tue	Wed	Thu	Fri	Sat	Sun
Charles Tounelly	[Signature]	NSW RCC	/	/	/	/	/	/
Ervin B.	[Signature]	RCC	/	/	/	/	/	/
Joe Hrabia	[Signature]	RCC	/	/	/	/	/	/
Dave Key	[Signature]	RCC	/	/	/	/	/	/
Sam Knight	[Signature]	SC	/	/	/	/	/	/
David M.	[Signature]	NSW RCC	/	/	/	/	/	/
Steve Mayfield	[Signature]	RCC	/	/	/	/	/	/
D. Dingley	[Signature]	RCC	/	/	/	/	/	/
M. S. Alai	[Signature]	Landrol	/	/	/	/	/	/
M. Lohane	[Signature]	"	/	/	/	/	/	/
Chris Evans	[Signature]	CCS	/	/	/	/	/	/
Kevin Brown	[Signature]	RCC	/	/	/	/	/	/
Concannon	[Signature]	RCC	/	/	/	/	/	/
Dimitrios	[Signature]	RCC	/	/	/	/	/	/
John	[Signature]	RCC	/	/	/	/	/	/
Tom Hemmett	[Signature]	RCC	/	/	/	/	/	/

RICHARD CROOKES CONSTRUCTIONS PTY LTD ABN 33 201 375 286 Licence 476602
Level 3 4 Broadmead way Atterton NSW 20617 PO Box 1004 Crook's Neck NSW 1585 P 02 9602 4700
Rev Date: May 2018

Figure 3 Daily attendance register

RICHARD CROOKES CONSTRUCTIONS

No. 10/2019 00001

RISK REPORT

INTRODUCTION

Project Name Modular Schools - Jordan Springs PS		Project Name 1157	
Prepared By and Position Tom Hemmett Site Engineer	Approved By and Position Darren Vozzo Project Manager	Distribution To:	
Revision Date 01/10/2019	Next Revision Date 01/11/2019	Risk Matrix? No	

Category	Activity	Risk	High Risk	Control
Adjacent Entities	Neighbours	Excessive noise emissions		Works to be completed in accordance with CVNMP
Amenities	RCC typical shed configuration	Hygiene/Size		Project teams to refer to RCC shed layout guide Sheds to be regularly cleaned
Confined Space	Working in confined space	Workers not competent	Work in or near a confined space	RCC to request verification of competency of workers who enter confined space prior to carrying out work. An emergency response procedure must be in place with adequate resourcing and trained personnel prior to carrying out confined space work. Only person/s whom have Confined Space qualification will be authorised to enter confined space

Figure 4 Risk report on site notice board

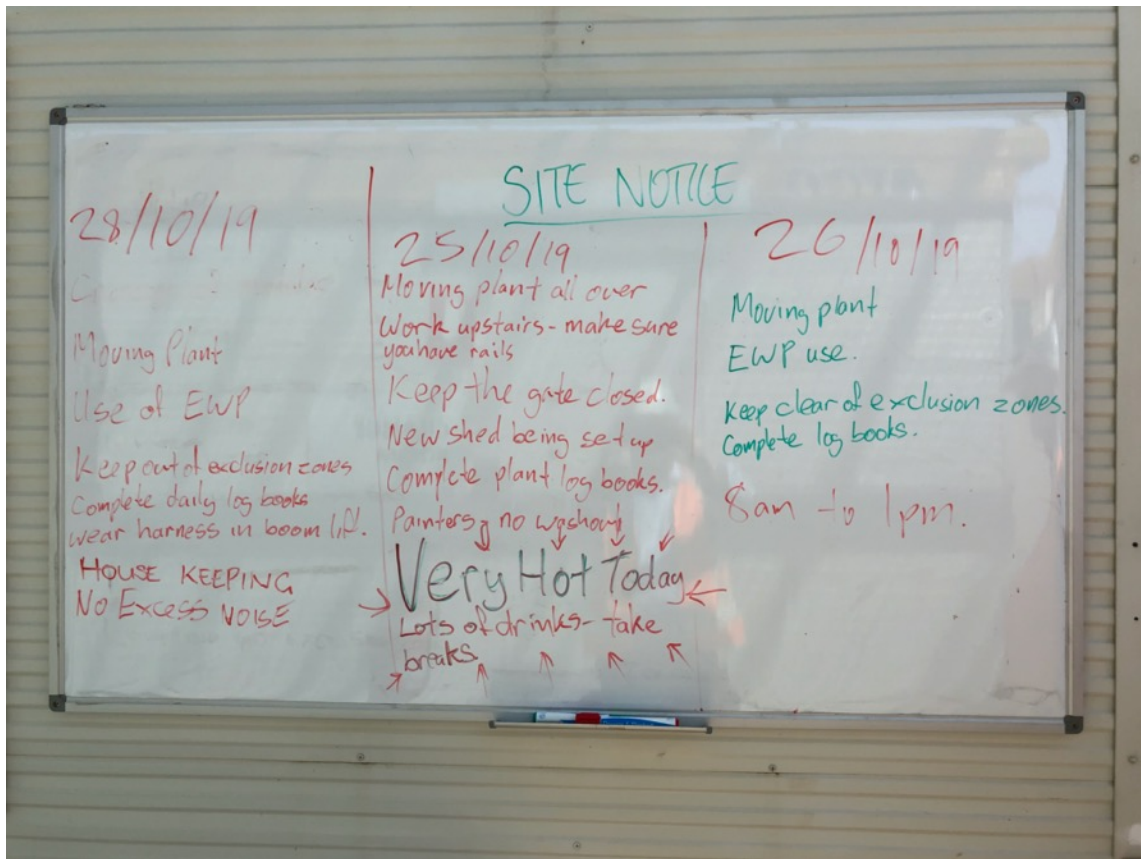


Figure 5 Risk notification board

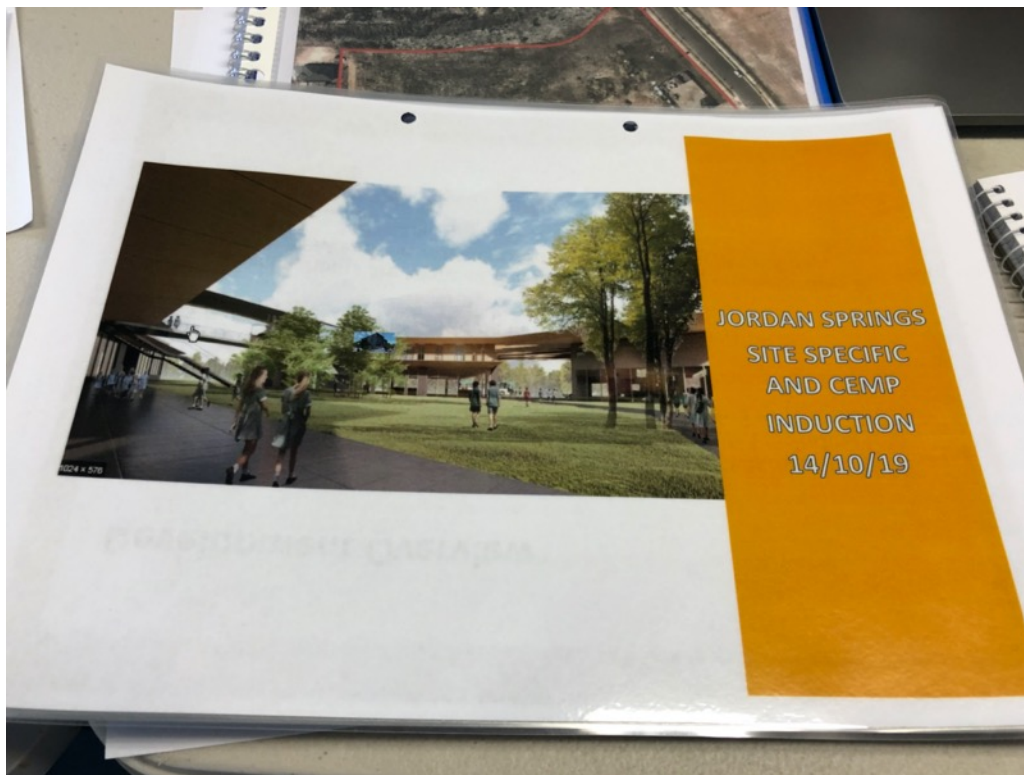


Figure 6 Onsite copy of site induction



Figure 7 Sediment protection for stormwater grates



Figure 8 Stockpile stabilisation and erosion and sediment control



Figure 9 Entry/ exit point to site with rumble grid and wheel wash



Figure 10 Wheel wash down prior to leaving site



Figure 11 Sediment protection at entrance to site



Figure 12 Site waste bins

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Waste Management


WHY IS IT IMPORTANT?

- Must comply with legislation concerning storage, handling, transport and disposal- general, contaminated soils, hazardous materials
- Good waste management saves time and money by protecting the environment
- The law says its necessary, prosecution or site shutdown can occur if not compliant
- Waste management is very complex in terms of environmental side effects.


DO's

- ✓ Reduce the amount of waste being generated by not over-ordering and storing correctly – it SAVES \$\$\$
- ✓ Ensure waste is put in the right skip
- ✓ Use recycling bins for correct items
- ✓ Store hazardous wastes correctly
- ✓ Report to supervisor when skips are full and need replacement
- ✓ Separate and dispose of contaminated materials in accordance with Workcover/DECCW requirements


IT'S THE LAW!



Contaminated Soil







Lead Paint



Asbestos

DONT's

- ✗ Leave waste on or about the site (litter)
- ✗ Mix general and hazardous waste in the same skip
- ✗ Forget that material you may not consider waste may legally be classified as waste
- ✗ Ignore full or overflowing skips

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Fuels and Chemicals Control

WHY IS IT IMPORTANT?

➤ Fuels and Chemicals need to be stored or they can result in problems

Figure 13 Site notice board describing waste management procedure



Figure 14 Water suppressant in use



Figure 15 Sediment basin



Figure 16 Site spill kit



Figure 17 Hydraulic oil spill in process of being remediated

