



Independent Environmental Audit – SSD Construction Compliance Report

LINDFIELD LEARNING VILLAGE
MARCH 2019

Aspect Project Reference: 0011030320

REVISIONS

Revision	Date	Description	Prepared by	Reviewed by	Approved by
0	16/01/2019	Issued to Savills for review and comment	Norman McComb; Richard Johnson; Caitlin Johnson	Richard Johnson	Richard Johnson
1	12/02/2019	Final Draft Report	Norman McComb; Richard Johnson; Caitlin Johnson	Richard Johnson	Richard Johnson
2	20/03/2019	Final - Updated following DoE and Savills review	Norman McComb; Richard Johnson	Richard Johnson	Richard Johnson



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EXECUTIVE SUMMARY

Conditions of Consent, issued in respect of the Partial Development Consent for State significant development SSD 8114 (24 October, 2018) require, under condition B57, 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 Condition of Consent B56
- 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)
- 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 December 2018 and January 2019, with site inspections and interviews undertaken on the 11th and 13th of December 2018 as well as the 4th January 2019. Findings of the audit are presented against the required scope within the body of this report, the attached Audit Table (Appendix B) and in the Photo Log provided at Appendix C.

Consultation with other agencies was undertaken, namely Ku-ring-gai Council; Transport for New South Wales (TfNSW); Roads and Maritime Services (RMS); SafeWork New South Wales (SafeWork); Department of Education (DoE); and Department of Planning and Environment (DP&E). No adjustment was made to the audit scope and/or audit table as a result of this consultation.

It was found that the site was generally compliant, and the project was generally being managed in accordance with the requirements of the SSD 8114 consent. Of the 134 conditions of consent relevant to the current audit, the following findings of compliance were made:

- 103 compliant
- 5 non-compliant
- 26 not triggered

The timing constraints for the project have required reliance to be placed on compliance being demonstrated retrospectively. As a result, non-compliances can be attributed to works having commenced prior to documented Planning Secretary approval. Environmental performance of the development was considered to be satisfactory with no discernible off-

site impacts at the time of audit. Appropriate mitigation controls implemented on site were observed throughout the audit.

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 the suggested mitigation and management measures from the EIS versus the actual impacts and mitigation measures implemented on the project was also undertaken. The requirement for site activities and management plans and control documentation to address the predicted impacts was evidenced however, some expected documentation was not identified. It was determined that predicted impacts align with the nature, scale and extent of works observed on site.

No clearly referenced environmental management system (EMS) was identifiable for the site or development. This audit is not an assessment of a conforming EMS under ISO 14001, but the findings identified an absence of implementation of some of the components expected of an EMS that would assist and inform site management activities. This absence creates a gap in appreciation of management of risk and change management practice which in turn feeds down to documentation, communication, training and monitoring and reporting requirements for the development. This was particularly noticeable in relation to bushfire management practices, which were primarily focused on management of an inner protection area (IPA) and Asset Protection Zones (APZ), in accordance with CoC B5 to B13, rather than including an appreciation and consideration of managing risk associated with hot works during the declared bushfire season.

The reviewed Environmental Management Plans and Sub-plans were considered to generally be adequate for the nature of the site. Improvement opportunities were identified in respect of:

- bushfire management controls and performance of hot works;
- flood evacuation considerations for regional roads (Delhi Road and Lady Game Drive);
- integration of complaints registers; and
- alignment of management plan documentation to the content expectations of the CoC (e.g. sequencing of address of the sub-condition requirements of a CoC)

Improvement opportunities and observations were identified pertaining to:

- documenting legal requirements;
- documenting and referencing a risk-based approach to support compliance demonstration;
- aligning site documentation (down to site induction documentation, site inspection and toolbox talks) to be reflective of the CoC and CEMP content; and
- Clear integration of SSD requirements across management systems and work practices, including nominated roles and responsibilities.

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

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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 audit team after consideration of the audit objectives and all audit findings
Audit client	Organization or person requesting an audit
Auditee	Organization being audited
Auditor	Person with competence to conduct an audit
Audit team	One or more auditors conducting an audit, supported if needed by technical experts. One auditor of the audit team is appointed as the audit team leader. The audit team may include auditors in training.
Audit plan	Description of the activities and arrangements for an audit
Audit scope	Extent and boundaries of an audit.
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Improvement opportunity	A finding resulting from either site inspection or document review which enables the auditee to consider the adoption of an action or strategy that will enhance environmental performance against the audit criteria.
Non-Compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.
Observation	A comment on an environmental aspect, value or management control, process or record that is not a specific requirement of the audit criteria.

1. INTRODUCTION

1.1. Project Background

The Lindfield Learning Village (the School) is proposed to ultimately accommodate 2,100 students from kindergarten to Year 12. The school will take enrolment pressure off surrounding primary schools exceeding student capacity and accommodate future population growth within the Ku-ring-gai Local Government Area (LGA). The school will contain high quality classrooms, collaborative learning spaces, open play spaces, sports courts and associated facilities.

The development, as a whole, will include:

- three new home-base schools within the existing buildings;
- upgrades to the existing theatre;
- upgrades to the existing sports hall;
- provision of a 40-space child care facility; and
- high-quality technical spaces for science, engineering, hospitality, visual and performing arts, as well as music and film.

The project will be delivered in three stages to allow the school to grow while meeting the needs of increasing enrolments.

The project currently in Stage 1, is to be completed by the start of Term 1, 2019 (end of January 2019). This stage involves the refurbishment / redevelopment of existing structure to create learning spaces and school facilities for up to 350 students. Stage 1 is the subject of this construction period Independent Environmental Audit under the conditions of consent (CoC) issued in respect of State significant development (SSD) 8114.

Stage 2, will involve the expansion of the school facilities to provide additional capacity. Final works will involve construction of further administration facilities and completing any finishing touches on the school facilities and classrooms.

1.2. Project Location

The site is located at 100 Eton Road, Lindfield and is legally described as Lot 2 DP1151638. The site is within the Ku-ring-gai Local Government Area (LGA) and comprises an irregular-shaped parcel of land with a total area of approximately 3.6 ha.

The former University Technology Sydney (UTS) Ku-ring-gai Campus currently occupies the site and it is proposed to be refurbished to accommodate the new school. The building consists of a single concrete structure and has six storeys with basement and rooftop plant rooms and an astronomy observation tower.

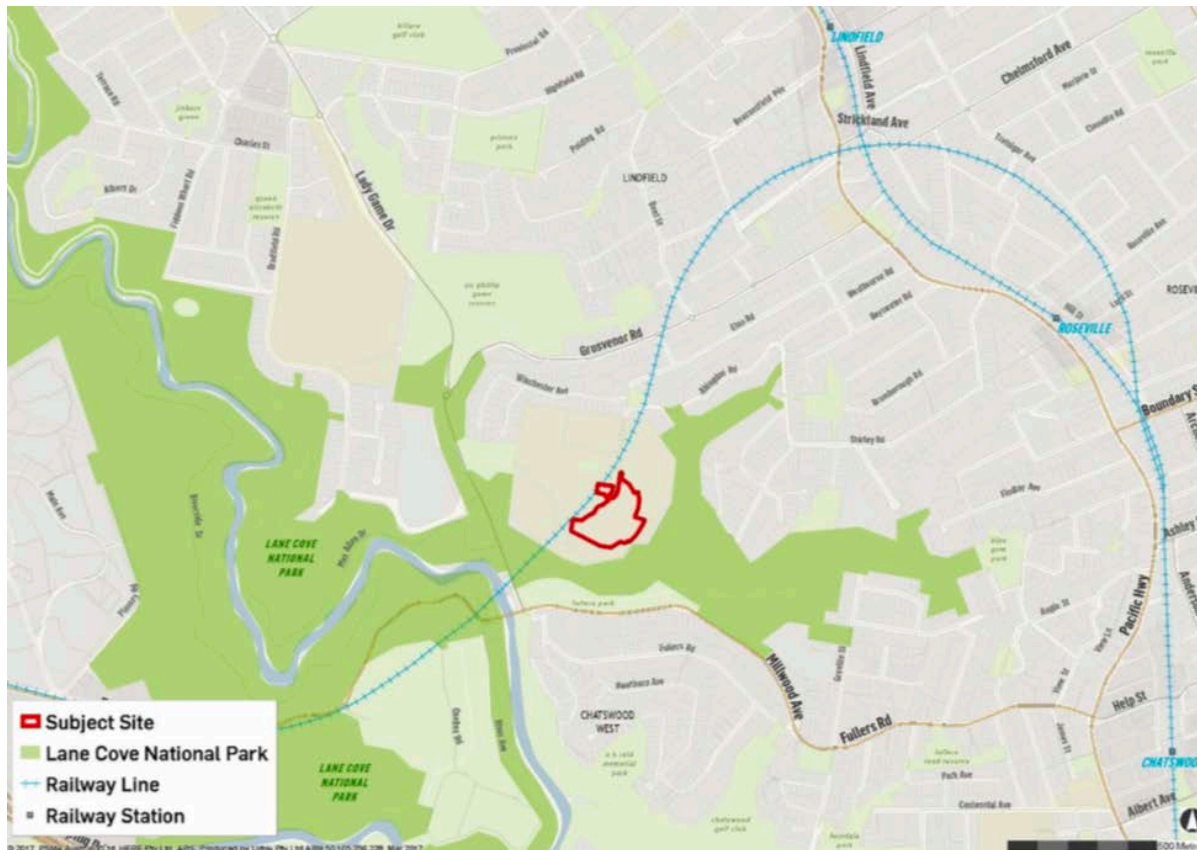


Figure 1 Site Location (Source: Urbis Environmental Impact Statement June 2017)

Vehicular and pedestrian access to the campus is available via Eton Road, with rows of car parking located to the east of the existing building reflecting the topography of the site and dense pockets of native vegetation. A total of 184 marked parking spaces are currently available within the site, including 35 spaces within the basement and 149 at-grade spaces. A pedestrian footbridge over Dunstan Grove links the main campus building to the gymnasium.

1.3. State Significant Development

Under the Partial Development Consent for SSD 8114, the following development is permitted as Phase 1 or Stage 1:

- adaptive reuse of the existing building to construct one home-base for 350 students;
- construction of all administrative and technical spaces to support a fully primary and secondary curriculum for 350 students;
- construction of a fire trail for bushfire management purposes;
- traffic and transport infrastructure; and
- tree removal to establish a 100 metre Asset Protection Zone (APZ) around the home-base on the site.

The conditions of the SSD Partial Development Consent are structured under the following category headings:

- Administrative Conditions (Conditions A1 to A25)
- Prior to Commencement of Construction (Conditions B1 to B58)

- During Construction (Conditions C1 to C43)

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

1.4. Audit Introduction

Independent environmental audits are required to be undertaken under CoC B57 of Partial Development Consent SSD 8114.

Condition B57 identifies that the independent audit must be carried out in accordance with:

(a) the Independent Audit Program submitted to the Department and the Certifier under condition B56 of this consent; and

(b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).

The Independent Audit Program (IAP) was prepared by Aspect Environmental Pty Limited submitted to the Department of Planning and Environment (DP&E) on 26 October 2018. 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 Lindfield Learning Village with the issued conditions of consent for SSD 8114 and to provide an objective evaluation of environmental performance of the development.

1.6. Audit Team

The audit team consisted of:

- Richard Johnson (Lead Auditor), Director of Aspect Environmental Pty Limited
- Norman McComb (Auditor), Associate Director at Aspect Environmental Pty Limited
- Caitlin Johnson (Audit-support), Consultant at Aspect Environmental Pty Limited

This initial independent environmental audit was conducted by Richard Johnson of Aspect Environmental Pty Limited (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 Partial Conditions of Development Consent for SSD 8114 and by the expectations of the IAPAR (DP&E, 2018).

The Audit Findings (APPENDIX A) identifies 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, June 2017) and associated Response to Submission documentation
- 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)
- The independent auditing requirements and expectations specified in the IAPAR (2018).

The audit scope consisted of:

- An assessment of compliance with Conditions of Consent 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 environmental impact assessment;
 - 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; and
 - 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.
- Identification of the status of implementation of previous audit findings;
- 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 (eg as identified through consultation with relevant agencies and review of complaints registers).

This scope is consistent with that identified within the IAP (Aspect, October 2018) and the IAPAR.

1.9. Audit Period

The audit is confined in time to the status of the site documentation, reviewed between 27 November 2018 and 18 January 2019, and site operations at the time of the site inspections, undertaken by the Audit team on 11th and 13th December 2018, and 4th January 2019.

2. AUDIT METHODOLOGY

2.1. Selection and Endorsement of Audit Team

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.

Auditor: Norman McComb

Norman holds tertiary qualifications in Geography (BSc, Hons) and Environmental Engineering (MSc) and has 12 years of experience in environmental management, auditing and assessment. Norman completed Lead Auditor training under SAI Global in 2013.

Request for endorsement was included within the Independent Audit Program (Aspect 26 October 2018) and provided by email to the DP&E Compliance team on 6 November 2018. A subsequent request for the CV was made by DP&E on 20 December 2018 and responded to on 21 December 2018. Additional supporting information was provided to the DP&E on 11 January 2019.

The DP&E agreement to the nominated lead auditor was received on 17 January 2019 and is included with the audit declaration at Appendix A.

2.2. Independent Audit Scope Development

The DP&E 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 (October 2018) 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 27 November 2018. Attendees at the meeting were Emma Viljoen (Savills), Sasha Serrao (Savills), Stephanie Edmondson (Savills), Richard Johnson (Aspect) and Norman McComb (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.

Agency/Stakeholder Consultation

Consultation with the following agencies/stakeholders was undertaken by Aspect:

- Ku-ring-gai Council
- Transport for New South Wales (TfNSW)
- Roads and Maritime Services (RMS)
- SafeWork New South Wales (SafeWork)
- Department of Education (DoE)
- Department of Planning and Environment (DP&E)

Both Savills and DoE have had ongoing consultation with the following agencies throughout the project:

- Regional Fire Services (RFS)
- Office of Environment and Heritage
- State Emergency Services

Upon completion of consultation with the nominated agencies, no amendment to the audit scope was required.

Review of Complaints Registers

A review of complaints registers identified various means of registering a complaint for the development.

Complaints may be recorded via the project's website to either schoolinfrastructure@det.nsw.edu.au or Lindfieldlearningvillage@det.nsw.edu.au or alternatively to the dedicated project 1300 Community Hotline number or to Taylors' Project/Site Management Team directly (3 potential numbers).

A review of the various complaints registers identified that, although there was a disparity in the number and nature of complaints recorded, the nature of all complaints was adequately covered within the existing scope of the audit and could be referenced in terms of considering the general environmental performance of the site, the adequacy of control measures, and the project's EMS.

No amendment was made to the audit scope following review of the complaints registers.

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 the 11th and 13th December 2018 as well as the 4th January 2019. The following personnel were interviewed:

- Dean Fondas – Senior Project Manager, Taylors Construction
- Brent Kendall – Site Manager, Taylors Construction
- Daniel Diab – Site Engineer, Taylors Construction
- Shaggy Shen – Project Safety Advisor, Taylors Construction

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

2.5. Site Inspections

Inspections of the entire project site were carried out on each of the following dates:

- 11th December 2018
- 13th December 2018
- 4th January 2019

All site inspections were accompanied by at least one representative of Taylors' site management team.

Site inspections comprised a walkover of the defined construction footprint and included internal and external work environments.

2.6. Consultation

The following stakeholders were contacted during the audit period:

- Ku-ring-gai Council
- Transport for New South Wales (TfNSW)
- Roads and Maritime Services (RMS)
- SafeWork New South Wales (SafeWork)
- Department of Education (DoE)
- Department of Planning and Environment (DP&E)

A summary of the consultation findings with the above stakeholders has been provided in Table 5 in Section 3.11 of this report. As a result of this consultation, no adjustment was required to the audit scope and/or audit table.

Consultation with SafeWork NSW regarding the form of asbestos labelling identified no prescribed form other than the general form provided within *Code of Practice: How to Manage and control Asbestos in the Workplace (SafeWork NSW, September 2016)*.

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. The provided count of compliances and non-compliances represents the count against conditions of consent only. Non-compliances have been recorded against the high-level EMS review, however, this is not an assessment of a conforming EMS system under ISO 14001, but represents an absence of implementation of some of the components expected of an EMS.

2.8. Opening Meeting

The audit commenced with an opening meeting on 27 November 2018 at Savills' offices. During the opening meeting the objectives of the audit, the scope of the audit, the resources required and methodology to be applied were discussed. This opening meeting preceded commencement of existing document review.

Attendees at the meeting were:

- Emma Viljoen (Senior Project Manager, Savills);
- Sasha Serrao (Project Manager, Savills);
- Stephanie Edmondson (Project Manager, Savills);
- Richard Johnson (Lead Auditor, Aspect); and
- Norman McComb (Auditor, Aspect).

The opening meeting format and content was repeated on-site on the 11th December 2018 in the Taylors' project office preceding the site interview and inspection component of the audit.

Attendees at this meeting were:

- Dean Fondas (Senior Project Manager, Taylors);
- Brent Kendall (Site Manager, Taylors);
- Daniel Diab (Site Engineer, Taylors);
- Shaggy Shen (Project Safety Advisor, Taylors);
- Sasha Serrao (Project Manager, Savills);

- Richard Johnson (Lead Auditor, Aspect); and
- Caitlin Johnson (Audit Support, Aspect).

The on-site opening meeting confirmed timing requirements, audit methodology and resourcing needs. Timing for the on-site component of the audit had originally been intended for the 11th – 13th of December 2018, inclusive. During discussion at the opening meeting it was identified that vegetation removal works had not commenced as yet. It was agreed to adjust the date of the audit site component to capture this work activity within the audit timing.

Revised dates of 13th December 2018 and 4th January 2019 were confirmed.

2.9. Closing Meeting – Site Audit

The site audit closing meeting was held on the afternoon of 4th January 2019.

The site audit closing meeting was attended by:

- Dean Fondas (Senior Project Manager, Taylors);
- Brent Kendall (Site Manager, Taylors);
- Daniel Diab (Site Engineer, Taylors);
- Richard Johnson (Lead Auditor, Aspect); and
- Norman McComb (Auditor, Aspect).

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

- Initial findings – no site activity non-compliances, subject to review against the express wording of the conditions. It was noted that there needed to be an increased focus on maintenance of erosion and sediment control measures (i.e. sediment fencing and sediment controls over drains).
- Observed environmental performance in respect of maintenance of ErSed controls, bushfire management controls in respect of hot works, and asbestos materials management/labelling.
- The content and expectations within site environmental management plans being effectively communicated to contractor staff on site and integrated into toolbox talks.

It was identified that during the post-site audit phase further review of records and documentation would be undertaken prior to issue of the draft audit findings. This process would provide Savills and Taylorss 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 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.

Upon issuing of a draft report, a follow up meeting was held with Savills and the Department of Education on 28th January 2019. The draft audit findings were presented with relevant recommendations. These are presented in Section 4 of this report.

2.10. Review and Response to Draft Independent Environmental Audit Report

The draft Audit Report was provided to Savills and Taylors for review on 16th January 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.

A follow up meeting to discuss the draft report findings was held with Savills and the Department of Education on 28th January 2019. This meeting was attended by:

- Dean Fondas (Senior Project Manager, Taylors);
- Brent Kendall (Site Manager, Taylors);
- Sasha Serrao (Project Manager, Savills);
- Robert Walker (Project Director, Savills)
- Andrew Kyriacou (Project Director, Department of Education)
- Rebecca Willott (Project Manager, Department of Education)
- Jim Lewis (Project Director, Department of Education)
- Richard Johnson (Lead Auditor, Aspect); and
- Norman McComb (Auditor, Aspect).

A number of conditions were identified as “Non-Compliant” and / or “To be confirmed” due to an absence in information provided, or absence of documentation at the time of the audit.

Upon review of the draft audit report the following additional information was provided and findings updated accordingly.

Table 1 Draft Report Findings and Additional information provided

Approval Reference	Draft Report Findings	Additional Information Provided	Updated Findings
A14 Evidence of consultation		<p>Consultation trackers were provided demonstrating consultation with the following stakeholders:</p> <ul style="list-style-type: none"> • Ku-ring-gai Council • State Emergency Services • Regional Fire Services • Department of Planning and Environment • Roads and Maritime Services • Transport for NSW <p>These consultation tables / trackers in addition to the Aconex system demonstrates that the project is generally compliant with this condition.</p>	General compliance with this condition has been demonstrated.
A18 Demolition	<p>Demolition work has been carried out by Perfect Contracting. No demonstration of submission of work plan and statement of compliance being submitted to the Certifier prior to commencement of works has been sighted.</p> <p>No correspondence or documentation visible on Aconex.</p>	<p>Demolition works on the project were included in Review of Environmental Factors (REF) as exempt works.</p> <p>Exempt works covered under the REF approval was sighted.</p>	Demolition works are exempt and therefore defined as 'Not Triggered'.
A23 Access to Information	<p>No documentation publicly available on Applicant's website (as accessed 8/1/19), except access to complaints register and heritage information. Link is provided to SSD EIS and approval documentation on DP&E website, but does not include strategies, plans and programs required</p>	<p>Savills had directed Aspect to the project webpage for review of recent documentation added.</p> <p>Requisite information to be made available on the project webpage had still not been sighted by 31 January 2019.</p>	Compliance with this condition has not been demonstrated at time of audit.

Approval Reference	Draft Report Findings	Additional Information Provided	Updated Findings
	<p>under the conditions of consent or other documentation.</p> <p>Current stage and progress of the development does not provide clear indication of actual current stage and progress (as of 8/1/19).</p> <p>Contact details are provided for feedback and enquiries.</p> <p>Complaints register (update dated 17/12/19) is accessible for review.</p>		
B1 Notification of Commencement	This item was classified as “To be confirmed”, pending provision of further information.	Notification of staged commencement of SSD works from DoE to DP&E was sighted. The letter was provided by Andrew Kyriacou (DoE), with Sunday 11 th November noted as commencement date.	General compliance with this condition has been demonstrated.
B7 Bush fire	<p>The Vegetation Management Plan is presented as content within the Landscape Management Plan prepared by Kleinfelder (NCA18R82665, Rev 4 dated 12/11/18).</p> <p>DP&E comments of 7/11/18 noted as identifying consultation effort as being demonstrated by obtaining and addressing responses and documenting as a table.</p> <p>Consultation table with RFS prepared by Savills sighted - identifies submission of the completed document for RFS review rather than consultation in its preparation. Noting RFS correspondence of 12/11/18 indicating no comments on the LMP.</p>	<p>Project could not demonstrate that the Department had approved the LMP (as the VMP).</p> <p>A letter from DP&E dated 30/11/2018 was sighted as confirming approval by DP&E for this CoC</p>	General compliance with this condition has been demonstrated.

Approval Reference	Draft Report Findings	Additional Information Provided	Updated Findings
	<p>Approval by Backash dated 13 November 2018 "Bushfire Certificate Landscaping and Condition B6, B7, B8, B10, B13".</p> <p>Project is required to demonstrate that the Department has approved the LMP (as the VMP).</p>		
B11 Bush fire	<p>Construction identified as commencing 11/11/18.</p> <p>Executed Positive Covenant sighted (reference AN894063G).</p> <p>NSW LRS receipt dated 29/11/18.</p> <p>The instrument is dated and registered on 29/11/18. Both dates occur after the identified commencement of construction. The effect of the condition has been met, but not the timing requirements as specified in the Condition.</p>	<p>The project could not demonstrate compliance in the first instance against the identified commencement date for construction.</p> <p>Staged commencement of works communicated in a letter from DoE to DP&E (01 LTR SINSW ConditionB1_14Dec18[5].pdf) as agreed by DP&E in notification letter issued 2nd November, was sighted.</p> <p>Based on the staging dates, vegetation removal commenced 12 December 2018.</p> <p>NSW Land Registry Service receipt dated 29/11/18.</p>	<p>General compliance with this condition has been demonstrated.</p>
B13 Landscaping	<p>Vegetation removal commenced 12/12/18.</p> <p>The landscape management plan has been produced by Kleinfelder. The plan is originally dated 24/8/18 with the final version (v4) dated 12/11/18 to reflect consultation.</p>	<p>Approval from DP&E was not sighted during the site audit.</p> <p>An approval letter from DP&E dated 7 December was sighted. This letter suggested that the Bushfire Landscape Management Plan and supporting information generally satisfies condition requirements for the</p>	<p>General compliance with this condition has been demonstrated.</p>

Approval Reference	Draft Report Findings	Additional Information Provided	Updated Findings
	<p>Approval by Backash dated 13 November 2018 "Bushfire Certificate Landscaping and Condition B6, B7, B8, B10, B13".</p> <p>LMP submitted by DoE to DP&E 1/11/18; 2/11/18 and 19/11/18 reflective of responses to comments received (DP&E and RFS).</p> <p>The LMP has been developed in general accordance with CoC B13 and satisfies sub-conditions a, b, c, e, f, i, and l, however the following sections need addressing:</p> <p>d: LMP is required to be updated to include the additional information: provisions within CoC B5 & B6</p> <p>g: LMP to be updated with the inclusion of contour lines.</p> <p>h: LMP needs to reference protection measures.</p> <p>j & k: Design Inc Partial School Materials, Finishes and Planting Schedules (Doc No. LA- T-1000) to be provided</p> <p>m: Taylorss to provide evidence that all outdoor fencing is being constructed of non-combustible material.</p> <p>n: Design Inc Partial School Materials, Finishes and Planting Schedules (Doc No. LA- T-1000) to be provided.</p> <p>Also, the Project to demonstrate plan has been developed to the satisfaction of the Planning Secretary.</p>	<p>exception of amendments requested as part of Schedule 1 of that letter.</p> <p>The amendments requested as part of Schedule 1 were asked to be addressed and submitted to the DP&E.</p> <p>Savills addressed the Schedule 1 items and sent evidence to the DoE 19 December (Aconex GCOR-001871).</p> <p>The approval letter does not request submission of amendments for approval or confirmation that amendments have been made to the satisfaction of the DP&E.</p>	

Approval Reference	Draft Report Findings	Additional Information Provided	Updated Findings
	Compliance with this condition has not been demonstrated.		
B16 Remediation Action Plan	<p>A RAP has been produced by EIS. The RAP is dated 16 August 2018.</p> <p>Works identified in site interview as commencing on site 29 October 2018.</p> <p>Addendum to the RAP was prepared by EIS (report ref: E30259KMrpt3_RAP_Addendum, dated 21 November 2018).</p> <p>a: No mention of Cost Benefit Analysis. Section 5.2 of RAP "consideration of Remediation Options". b: No volume estimates c: RAP provides procedure for non-investigated areas. Need to demonstrate how this will be followed / implemented d: No indication that this has been met? e: See point d.</p> <p>Sighted Interim Advice #11 from Accredited Site Auditor, Dr Ian Swane, dated 21 November 2018.</p> <p>DoE email dated 30/11/18 identifies the RAP update under CoC B16 being submitted to DP&E on 28/11/18.</p> <p>Updated RAP has not been submitted prior to commencement of works in general, but has been</p>	<p>A RAP has been produced by EIS. The RAP is dated 16 August 2018.</p> <p>Works identified in site interview as commencing on site 29 October 2018.</p> <p>Addendum to the RAP was prepared by EIS (report ref: E30259KMrpt3_RAP_Addendum, dated 21 November 2018).</p> <p>a: No mention of Cost Benefit Analysis. Section 5.2 of RAP "consideration of Remediation Options". b: No volume estimates c: RAP provides procedure for non-investigated areas. Need to demonstrate how this will be followed / implemented d: No indication that this has been met? e: See point d.</p> <p>Sighted Interim Advice #11 from Accredited Site Auditor, Dr Ian Swane, dated 21 November 2018.</p> <p>DoE email dated 30/11/18 identifies the RAP update under CoC B16 being submitted to DPE on 28/11/18.</p>	General compliance with this condition has been demonstrated.

Approval Reference	Draft Report Findings	Additional Information Provided	Updated Findings
	<p>submitted to DP&E in advance of works disturbing the site areas addressed by the condition.</p> <p>RAP addendum 21/11/18 addresses items (c) ; (d) and (e) of the condition, but not (a) and (b).</p> <p>Item (c) of the condition identifies the procedure for additional site investigations but not the findings. A copy of the findings of the EIS investigations were requested during site audit on 4/1/19. Identified in RFI response (4/1/19) as not being relevant to ACM. No mention of PCB or lead hot spot.</p> <p>If PCB contaminated material has been identified on site, Chemical Control Order (CCO) Polychlorinated Biphenyl (PCB) Chemical Control Order 1997, would need to be adhered to. The keeping of PCB contaminated soils on the premises would need to satisfy Section 6.3 of the CCO.</p>	<p>Updated RAP was not submitted prior to commencement of works in general but has been submitted to DP&E in advance of works disturbing the site areas addressed by the condition.</p> <p>RAP addendum 21/11/18 addresses items (c); (d) and (e) of the condition, but not (a) and (b).</p> <p>Item (c) of the condition identifies the procedure for additional site investigations but not the findings. A copy of the findings of the EIS investigations were requested during site audit on 4/1/19. Identified in RFI response (4/1/19) as not being relevant to ACM. No mention of PCB or lead hot spot.</p> <p>A Site Audit Statement dated 25/01/2019 was provided as evidence as part of the audit closing meeting suggesting that the SSD project site has been investigated and remediated so that the site is suitable for its intended use without the need for any other conditions.</p>	
B29	<p>Taylorss CEMP dated 29/10/18, reference 18236.</p> <p>Savills' letter of 31/10/18 to DoE identifies submission of the CEMP to the certifier for their action.</p>	<p>BCA Certifier formally acknowledged receipt and satisfaction with the CEMP, as per the BCA Certifier's letter dated 31 Oct 2018 [email from Savills to Aspect 4 Mar 2019].</p>	<p>General compliance with this condition has been demonstrated.</p>

Approval Reference	Draft Report Findings	Additional Information Provided	Updated Findings
	<p>DoE correspondence to DPE dated 30/11/18 identifies submission of CEMP to DPE on 2/11/18.</p> <p>BCA Logic letter dated 10/12/18 certifies provided CEMP and CFFMP as satisfying the requirements of the condition.</p> <p>Construction commenced 11/11/18.</p> <p>The content of the CEMP generally complies with the requirements of sub-conditions of CoC B29(a - i).</p> <p>Construction works commenced 11/11/18.</p> <p>The CEMP was not approved at time of commencement of works.</p> <p>Compliance with this condition has not been met.</p>		
B35 Bushfire and Flood Emergency Sub Plan	<p>The BFFERSP for the project was sighted and have been developed in general compliance with the all sub-condition of CoC B35.</p> <p>An on-site Bushfire Evacuation Plan A3, Taylorss, and Site Evacuation Plan A3, Taylorss, were sighted during the audit (4/1/19).</p> <p>BCA Logic letter dated 1/11/18 affirms certifier's consideration that condition is satisfied by reference to Blackash Bushfire Emergency Response Sub-Plan (Version 1.0 dated 11/10/18) and EFWF Flood Emergency Management Plan reference no. 21151-</p>	Savills provided consultation tracker to demonstrate consultation with State Emergency Services.	General compliance with this condition has been demonstrated.

Approval Reference	Draft Report Findings	Additional Information Provided	Updated Findings
	<p>001, dated 18/10/18) and Bushfire and Flood Evacuation Routes plan (Taylorss - as referenced above).</p> <p>Savills' letter to DoE dated 19/10/18 identifies documentation to be forwarded to RFS and NSW SES for approvals. Additionally, plans are identified as being issued to PCA and Council for approval, rather than for consultation as per the condition.</p> <p>RFS consultation table sighted, identifying no comment made in respect of the evacuation plan as at 12/11/18.</p> <p>Council consultation initiated by Schools Infrastructure NSW (SINSW) on 27/9/18 identified in Council Correspondence tracker identifying walkover of area on-site and evacuation footpath route. No indication of consultation with NSW SES.</p> <p>...</p> <p>... Compliance with this condition has not been demonstrated.</p>		
B48 Construction and Demolition Waste Management	<p>Truck routes have been provided as part of the CTPMSP (page 11 of plan dated 02 October 2018).</p> <p>General compliance with this condition has been met. However, project is required to demonstrate that RMS has been notified to satisfy compliance with this condition.</p>	<p>Additional evidence provided demonstrates RMS notification via email on 16 October 2018 from Perfect Contracting.</p> <p>Communication with both RMS Special Permits Unit (SPU) and RMS Transport Management Centre (TMC) has been sighted.</p>	<p>General compliance with this condition has been demonstrated.</p>

Approval Reference	Draft Report Findings	Additional Information Provided	Updated Findings
B50 Rainwater harvesting	<p>Aconex reference to B50 defaults to B49.</p> <p>Condition compliance to be confirmed.</p>	<p>Aconex Letter from Erbas states: a Colorbond steel rainwater tank with a capacity of approximately 1000 liters will be installed on level four (4) to the Northern side of the building designated as Zone A, documented on hydraulic drawing SYD18152-LI-H-A105. Letter is certified by a hydraulic engineer.</p>	<p>General compliance with this condition has been demonstrated.</p>
B51 & B52 Roadworks and Access	<p>Email correspondence Savills to Ku-ring-gai Council (Jim Turner) 23/10/18. Comments requested by 26/10/18.</p> <p>ARUP Certification dated 30 October identifying design meets the condition.</p> <p>No confirmation identified of Council's satisfaction. Noted that the condition itself does not specify "prior to commencement of construction", however, the condition sits under Schedule 2 Part B "Prior to Commencement of Construction".</p> <p>Letter from BCA (1 November 2018) certifying satisfaction of condition sighted for CoC B52. Council approval for B52(f) not sighted.</p> <p>General compliance with B51 has been demonstrated, however, "satisfaction of the relevant roads authority" has not been evidenced.</p> <p>General compliance with B52 has been demonstrated, however, approval for sub-condition (f) has not been demonstrated.</p>	<p>Drawing # TCI-6200 & TCI-6201, issue B, prepared by Birzulis Consulting Structural & Civil Engineers, dated 15/10/2018 and displaying council stamp (5 November 2018) has been sighted.</p>	<p>General compliance with these conditions has been demonstrated.</p>

Approval Reference	Draft Report Findings	Additional Information Provided	Updated Findings
C1 Heritage Interpretation strategy	<p>Interpretation strategy not sighted.</p> <p>New handrails - colour matched for current standard compliant handrails were identified and observed. Some of the change room benches in zone A were identified to be re-used. Matched replaced windows design to be fire rating appropriate.</p> <p>A documented heritage interpretation strategy was not evidenced at time of audit.</p>	<p>A Heritage Interpretation Strategy (Urbis, 28/11/2018) was provided within four weeks of commencement of construction and has been sighted.</p>	<p>General compliance with this condition has been demonstrated.</p>
C40 Incident Notification, Reporting and Response	<p>A site project incident register was provided as part of the site audit. The register has two entries, the most recent incident, "Drilling of asbestos in music room from Mechanical", dated December 2018.</p> <p>Project has recorded two incidents to date. There is no evidence to suggest that the DP&E has been notified nor the incidents reported in accordance with this condition.</p> <p>Need to verify communications with DP&E Compliance team.</p> <p>General compliance with recording of this incidence however, there is a need to demonstrate incident notification and reporting in line with this condition.</p> <p>Compliance with this condition has not been demonstrated.</p>	<p>Savills requested that incident notification to the DP&E be reviewed.</p> <p>Upon review it was established that DP&E Compliance Team identify an incident as: <i>"an occurrence or a set of circumstances that causes or threatens to cause material harm"</i>.</p> <p>Based on this definition, the proponent has not identified any occurrences or a set of circumstances on the project required to be reported.</p>	<p>General compliance with this condition has been demonstrated.</p>

The final audit findings are presented in Section 3 of this report and detailed findings presented in APPENDIX A.

Under SSD 8114 CoC B58, 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 8114 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 11th and 13th December 2018, and 4th January 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 8114 (Source: Urbis EIS June 2018)

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 2. Site specific registers, procedures and checklists sighted as part of this audit are provided in Table 3.

Table 2 Approval and document list

Approval Reference	Document Details
Environmental Impact Statement	Lindfield Learning Village EIS was produced by URBIS and dated 8th June 2017.
State Significant Development 8114 Partial Development Consent	SSD 8114 dated 24th October 2018.
B7 Vegetation Management Plan (VMP)	A VMP was not referenced during audit. The content provided within the Landscape Management Plan (CoC B13) addresses VMP requirements.
B13 Landscape Management Plan	The landscape management plan has been produced by Kleinfelder. The plan is dated 24 August 2018.
B14 Contaminated Site Investigations	<p>The following reports and correspondence have been viewed and satisfies CoC B14.</p> <ul style="list-style-type: none"> • Virgin Excavated Natural Material Assessment, EIS, 13 November 2018 • Interim Advice #08 for Statutory Site Audit No. 279 by Dr Ian Swane, Review of Staging of RAP for Lindfield Learning Village Project, 8th November 2018 • Interim Advice #11 for Statutory Site Audit No. 279 by Dr Ian Swane, RAP Addendum for Lindfield Learning Village Project, 21st November 2018 • Addendum to the RAP was prepared by EIS (report ref: E30259KMrpt3_RAP_Addendum, dated 21 November 2018).
B17 Unexpected Contamination Procedure	An unexpected contamination procedure is provided within the RAP.
B21 Community Communication Strategy	A Community Communication Strategy dated October 2018 was produced by School Infrastructure NSW.
B29 Construction Environmental Management Plan	Zoic Environmental produced the project CEMP. The plan is dated 29 October 2018.
B30 The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP)	Commercial TC produced the CTPMSP. The plan is dated 2 October 2018.
B31 The Construction Noise and Vibration Management Sub-Plan (CNVMSP)	The CNVMSP was produced by Acoustic Logic. The plan is dated 5th October 2018.
B32 The Construction Waste Management Sub-Plan (CWMSP)	<p>The following documents have been prepared to satisfy CoC B32:</p> <ul style="list-style-type: none"> • Dumpit Bins, Waste and Recycling Process & Flow, Not dated • Foresight Environmental - Construction and Demolition Waste Management Plan, 27 March 2017 • Pure Contracting- Asbestos Removal Control Plan, 10 August 2018

Approval Reference	Document Details
B33 Construction Soil and Water Management Plan (CSWMSP)	<p>A construction soil and water management plan was not reviewed as part of the audit. The management requirements associated with CoC B33 is addressed in a number of other documents, these include:</p> <ul style="list-style-type: none"> • CEMP Section 3.2.1 • Figures 4 - 11, Appendix A. • Section 13.2.3 of The Project Environmental Management Plan (PEMP) • EWWF Consulting Engineers provided a Certificate of Design Erosion and Sediment Control Plans reference Nos.C-011 through C-017 revision A all dated 10/10/18
B34 Construction Flora and Fauna Management Sub-Plan (FFMSP)	The FFMSP has been prepared by Kleinfelder. The plan is dated October 2018
B35 Bush Fire and Flood Emergency Response Sub-Plan (BFFERSP)	EWWF Consulting Engineers produced the BFFERSP. The plan is dated 18 October 2018
B42 Conservation Management Plan (CMP)	URBIS produced the project CMP. The plan is dated 6 November 2018.
B43 Heritage Implementation Strategy (HIS)	A HIS was produced by URBIS. The strategy is dated 14 November 2018.
C1 Heritage Interpretation Strategy	A Heritage Interpretation Strategy was produced by URBIS. The strategy is dated 28 November 2019.

Table 3 Construction site document list

Document Details	Document Details & Observations
Project Incident Register	Two events entered, most recent entry December 2018 relating to disturbance of asbestos containing material in the building structure.
Legal Requirements Register	Provided legal register did not have any entries. Taylorss general register provided at final closeout meeting.
Site induction SE-F-11	Dated January 2018, the induction was not signed on or have the names of the inductees.
Safety Data Sheet (SDS) Register SE-F-10 (not dated)	
Toolbox / Daily Pre-Start Talk SE-F-20	<p>The following toolboxes were sighted during the site audit:</p> <ul style="list-style-type: none"> • High Risk Works – Tree Cutting 03/01/2019 • Toolboxes for 28 & 29 November 2018 references Wet Weather • Toolbox for 7 January 2019 makes reference to excavation exclusion zone below 1 m, wet weather notice, maintenance of stormwater protection, and

Document Details	Document Details & Observations
	a general environmental note regarding housekeeping and stockpile management.
Safe Work Method Statements (SWMS)	The following SWMS were sighted during the site audit: <ul style="list-style-type: none"> • KLF F&F 03: Vegetation Quadrat Surveys and Collecting Vegetation Samples, August 2018 • KLF 21: SWMS - Use of Mulcher, September 2018 • Site Clearing Works – All Plant and Operations, Aura Trees, 2 August 2018
Bushfire Evacuation Plan A3	A3 map of bushfire evacuation route sighted on office wall. The plan was not dated. It was noted that this plan was not provided as part of the Bush Fire and Flood Emergency Response Sub-Plan (CoC B35)
Construction Noise Monitoring Report 06-13 December 2018	Report prepared by Marshall Day and dated 14 December 2018.
Delivery schedule	A delivery schedule for trucks entering the site for the 5 th December 2018 was sighted.
Environmental Inspection Records	An environmental weekly Checklist for the 10 th – 15 th December 2018 was sighted.
Asbestos Management	The following documents regarding asbestos management during construction were sighted: <ul style="list-style-type: none"> • Targeted Asbestos Investigation and Sampling, August 2018 • Asbestos Core Sampling, Risktech, 22 august 2018 • Disposal of 3.5 Tonne of Asbestos Sheeting, Perfect Contracting 28 September 2018 • Asbestos Clearance Certificate, Airsafe, 2 October 2018 • Asbestos Identification Analysis, Greencap, 31 October 2018 • Asbestos Clearance Certificate, Risktech, 10 December 2018
Waste Disposal Records	Waste Disposal Records were sighted for August 2018, September 2018, and October 2018. The reports were prepared by Fresh Start Australia
Tree Removal Records	<ul style="list-style-type: none"> • At Risk Tree – Aboricultural Report Tree 49, Rain Tree Consulting, 19 November 2018 • At Risk Tree – Aboricultural Report Tree 66, 67 & 96, Rain Tree Consulting, 19 November 2018 • At Risk Tree – Aboricultural Report Tree 88, Rain Tree Consulting, 19 November 2018

3.3. Other Approvals

During the audit it was identified that the project has acquired an additional approval from Ku-ring-gai Council pertaining to footpath and external project works. The approvals for these

works were issued by Ku-ring-gai on the 5th November and permit for said works received on 19th November 2018 (Application No ROP18/0272 | Licence No. 113536C).

An assessment of the project's compliance regarding this approval is provided in Section 3.4. of the report.

3.4. 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 is presented in APPENDIX C to this report.

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

Table 4 Summary of SSD Compliance Findings

SSD Category	# Requirements	# Compliant	# Non-Compliant	# Not Triggered
Part A - Administrative	28	14	1	13
Part B - Prior to Commencement of Construction	59	55	4	0
Part C - During Construction	47	34	0	13
Total	134	(103)	(5)	(26)

Non-compliances have also been identified separately for high level review of Project EMS implementation within APPENDIX A that are not recorded in the table above as these reflect an absence of some implementation components of an expected Project EMS.

Detail of the evidence and findings of the audit are provided in APPENDIX A.

Compliance with other approvals

- **Approval of Works in the Public Road Under Section 139 Roads Act 1993, Ku-ring-gai Council, November 2018:** It was determined that the project was compliant with prescribed conditions of this approval.

3.5. 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.

3.6. Audit Non-compliances

Of the 134 conditions of consent relevant to the current audit a total of 5 Non-Compliances were identified.

The majority of non-compliances relate to project works having commenced in absence of having documented approval from the Planning Secretary prior to commencement of works. The remaining non-compliances relate to other administrative requirements such as not having all approved plans published on the Applicant's public website.

Table 5 Summary of Audit Non-Compliances

Approval (ID)	Audit findings
A23 Access to Information	<p>No documentation publicly available on Applicant's website (as accessed 8/1/19), except access to complaints register and heritage information.</p> <p>https://www.schoolinfrastructure.nsw.gov.au/projects/l/lindfield-learning-village.html</p> <p>Link is provided to SSD EIS and approval documentation on DP&E website, but does not include strategies, plans and programs required under the conditions of consent or other documentation.</p> <p>Current stage and progress of the development does not provide clear indication of actual current stage and progress (as of 8/1/19).</p> <p>Contact details are provided for feedback and enquiries.</p> <p>Complaints register (update dated 17/12/19) is accessible for review.</p> <p>Documentation publication requirements of the condition are not being fully met at time of audit.</p> <p>Line item (a):</p> <p>(i) Website does not provide all documents listed in A2 of SSD CoC.</p> <p>(iii) all approved strategies, plans and programs required under the conditions of this consent. Following CoC for approved documents:</p> <p>B16 Remediation Action Plan (RAP)</p> <p>B29 Construction Environmental Management Plan</p>
B21 Community Communication Strategy	<p>Commencement of works on site identified during site interview as 11/11/2018.</p> <p>Aconex references Community Communication Strategy initially issued to DPE for approval on 25/10/18 and subsequent revision dated October 2018 responding to DPE comments of 29 October 2018, issued to DoE on 16/11/18.</p> <p>Copy of the CCS not sighted during the initial audit.</p>

Approval (ID)	Audit findings
	<p>DoE correspondence to DPE dated 30/11/18 identifies issue of CCS to DPE for approval 23/10/18 and revised on 19/11/18.</p> <p>Approval letter from DPE 7/12/2018.</p> <p>DPE has confirmed compliance of submitted documentation in accordance with this requirement in a letter dated 7/12/2018. Copy of CCS provided as part of closing meeting.</p> <p>CCS not approved prior to commencement of work, therefore compliance with all components of this condition has not been demonstrated.</p>
B55 Compliance Reporting	<p>A Compliance Monitoring and Reporting Program (CMRP) has been developed for the project (Aspect Environmental Pty Limited, Reference 0011021018, Rev 2 dated 26/10/18).</p> <p>Letter from BCA (1 November and 10 November 2018) certifying satisfaction of condition sighted for CoC B55.</p> <p>Correspondence from DoE to DPE dated 30/11/18 identifies issue of the CMRP to the DPE on 26/10/18 (reflecting updated conditions of consent to SSD 8114), and 28/11/18 (responding to DPE). The same correspondence identifies issue of the BCA Logic Certifier's letter of compliance to the DPE on 1/11/18.</p> <p>No compliance reports addressing the entirety of the prepared CMRP content have been identified as being completed for the project.</p> <p>A pre-construction compliance report would have ordinarily been expected to be undertaken for pre-construction activities prior to commencement of construction. The CMRP was issued to DPE on 26/10/18, BCA Logic prepared a certification assessment of address of conditions requiring certification on 1/11/18 (which was issued to the DPE) and construction commenced on 4/11/18.</p> <p>The timing constraints for the project have placed reliance for consideration of compliance for pre-construction demonstrated upon BCA Logic certifying satisfactory address of conditions and review of residual items being picked up in the independent audit to avoid duplication of effort.</p> <p>General compliance with this condition has been demonstrated, however, the CMRP was not submitted to DPE at least two weeks in advance of construction commencing.</p> <p>The Compliance Reporting Post-Approval Requirements (DPE 2018) identify compliance reports where a particular phase is required to be notified to the Department and includes submission of a pre-construction compliance report where a construction phase is required to be notified. The timing requirement</p>

Approval (ID)	Audit findings
	<p>for a pre-construction compliance report is identified as being required to be submitted to the Planning Secretary prior to commencement of construction.</p> <p>The BCA Logic letter of certification represents a compliance review and report for the pre-construction phase, however, is not in the form of the submitted CMRP document.</p> <p>Compliance with this condition has not been fully demonstrated.</p>
B56 Independent Environmental Audit	<p>An Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) has been prepared (Aspect Environmental Pty Limited, Reference 0011011018, Rev 2, dated 25/10/18).</p> <p>Letter from BCA (1 November and 10 November 2018) certifying satisfaction of condition sighted for CoC B56.</p> <p>Savills letter dated 6 November noting Independent Audit Program submitted to DPE on 1 November. Note commencement of construction 11 November.</p> <p>Email dated 6/11/18 from Savills nominating Independent auditor to compliance@planning.nsw.gov.au sighted.</p> <p>General compliance with this condition has been demonstrated. However, the Independent Audit Program was not submitted to DPE at least two weeks in advance of construction commencing.</p> <p>Compliance with this condition has not been demonstrated.</p>
B57 Independent Environmental Audit	<p>Addressed within the preparation of this current independent audit scope.</p> <p>The IAPAR identifies a requirement to submit the initial independent audit final Audit Report within 16 weeks of the commencement of construction, making the final Audit Report due on 25/2/19. Construction is due to be completed by 31/1/19.</p> <p>The Independent Audit Program and auditor nomination were provided to the DP&E on 6/11/18. On 20/12/18 DP&E requested the auditor's CV and a letter confirming independence from the Project. This content was originally provided in Section 6 of the Independent Audit Program submitted to the Department on 26/10/18. Replicate confirmation was provided by Aspect and to the Department on 21/12/18.</p> <p>The Site Audit commenced on 11/12/18.</p> <p>Section 3.1.3 of the IAPAR identifies that Independent Audits must not commence until the proposed auditor has been agreed to in writing by the Planning Secretary.</p>

Approval (ID)	Audit findings
	<p>No written agreement to the proposed auditor had been provided by the Planning Secretary at the time of audit commencement.</p> <p>General compliance with this condition is demonstrated by this audit itself, however, the independent audit has commenced in advance of receipt of written agreement to the nominated auditor being received from the Planning Secretary.</p> <p>DPE received confirmation of both auditor competence and independence from the project as of 26/10/18. Follow up by DPE on 20/12/18 by request of auditor CV and letter of independence and further request for information on 9/1/18.</p> <p>Compliance with this condition has not been demonstrated.</p>

3.7. Previous Audit Recommendations

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

3.8. EMP, Sub-plans and Post Approval Documents

A list of the post approval EMP and Sub-plans has been provided in Section 4.1. Documentation reviewed as part of the site audit is provided in Section 4.9.

3.9. 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 6:

Table 6 EMS Component Audit Scope

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

Communications	Identification of how the EMS is implemented during the course of the project, including the communication of change and access to information.
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Findings from the audit concluded that no clearly referenced environmental management system (EMS) was identifiable for the construction site or the development project. Components of an EMS were generally evidenced although not demonstrably integrated. These have been identified separately in the audit findings and APPENDIX A as four non-compliances, although they represent a non-conformance with expectations of an integrated EMS.

This absence creates a gap in appreciation of management of risk and change management practice which in turn feeds down to documentation, communication, training and monitoring and reporting requirements for the development. While there were various appropriate environmental management plans (EMP) evidenced in place for the project, a suite of EMPs is not in itself an EMS. With the exception of the legal requirements register presented at the closing meeting, there was no evidence of a project-tailored EMS

A comprehensive summary of audit findings is provided within APPENDIX A.

3.10. Environmental Performance

The environmental performance of the project was assessed over three site visits on the following Environmental Aspects (Table 7):

Table 7 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 (ie 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.
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Environmental controls implemented across the site were generally adequate in controlling environmental risks across the project site, controls in respect of “Heritage” were less apparent.

Although labelling and storage of heritage items was observed on the project there was no observed evidence of demarcation or protection measures to protect inadvertent impact to in-situ heritage items. It is important to note, however, that the project has not had any reported heritage incidents on the projects at time of audit. The project site has reportedly been separately inspected by officers of OEH on occasion, with no identified issue. Identification of protection measures to in-situ heritage items (i.e. seating) was provided at the final close-out meeting with observation that these items were appropriately covered and labelled.

Audit findings on the project’s environmental aspects is provided within APPENDIX A.

3.11. Consultation Outcomes

Stakeholders identified within Section 2.6 were contacted between the 7th December 2018 and 29th January 2019, and feedback sought with regards to project performance. A summary of the feedback received is provided in Table 8.

Table 8 Agency consultation outcomes

Agency	Contact	Date	Comment	Audit Scope Consideration
Ku-ring-gai Council	Jim Turner	7/12/2018	The contractors were professional in their approach to managing works on site and things appeared to be managed well during site visits from council. The temporary impact on parking around the soccer field was considered to be the only negative impact on the local community with regards the delivery of the project (via phone call).	All aspects of the construction delivery of the project.
TfNSW	Ken Ho	7/12/2018	TfNSW weren’t aware of any issues with project compliance and general dealings with the project had been good (via phone call).	Impact of the project on bus routes and timetables.
RMS	Ahsanul Amin	8/1/2019	RMS informed that their involvement has been minimal on Stage 1 and they were not aware of any concerns or issues	Impact of the project on other road users and transport flows.

Agency	Contact	Date	Comment	Audit Scope Consideration
			associated with the project (via phone call)	
SafeWork NSW	Thomas Yeung	7/12/2018	SafeWork were not aware of any compliance issues with the project (via phone call)	Legislative compliance with SafeWork.
DoE	Andrew Kyriacou & Rebecca Willot	11/01/2019	Meeting between DP&E, DoE, Savills and Aspect discussed the approval and appointment of Richard Johnson (Aspect) as Independent Auditor.	Acceptance and approval of Richard Johnson (Aspect) as Independent Auditor.
		28/01/2019	During the final audit meeting DoE were requested to bring forward any issues that should be considered within the independent environmental audit for the Lindfield Learning Village that should be added to the scope of the audit and require subsequent adjustment to the audit scope.	Impact on project compliance with conditions of consent.
DP&E	Andrew Beattie	11/01/2019	Meeting between DP&E, DoE, Savills and Aspect discussed the approval and appointment of Richard Johnson (Aspect) as Independent Auditor.	Acceptance and approval of Richard Johnson (Aspect) as Independent Auditor.
		29/01/2019	Phone call and email follow-up requesting feedback on particular areas that should be considered within the independent environmental audit for the Lindfield Learning Village that should be added to the scope of the audit and require subsequent adjustment to the audit scope.	No additional scope items identified. Impact on project compliance with conditions of consent.

Based on consultation with agencies within this audit scope, it can be reported that the project has been operating within expectations of those individual agencies.

3.12. Complaints

A site project complaint register with a single entry was sighted on 11th December 2018.

The audit identified 4 different avenues for registering a complaint, the project's website to either schoolinfrastructure@det.nsw.edu.au or Lindfieldlearningvillage@det.nsw.edu.au or

alternatively to the dedicated project 1300 Community Hotline number or to Taylors' Project/Site Management Team directly (3 potential numbers).

The NSW Department of Education – School Infrastructure Complaints Register for the project was viewed online (last updated 17 December 2018). The register had a total of four complaints, three of which are closed out and one remaining open and still under investigation. However, there was no evidence of verified closeout with the complainant.

3.13. Incidents

A site project incident register was provided as part of the site audit. The register has two entries, the most recent incident dated December 2018. A summary of the incidents is provided below:

Incident 01: Injury to site staff

Date: 25/10/2018

Description: Travis from Waco Scaffolding was walking downstairs to lower carpark, stepped in a hole in the step and fell over injuring right ankle.

Resolution: Got sent to the doctor and was placed on light duties.

Incident 02: Disturbance of Asbestos Containing Material

Date: December 2018 (exact date not provided)

Description: Drilling of asbestos in music room from Mechanical.

Resolution: Area got barricaded off and pure contracting came to site and decontaminated all the workers. Clothing & tools got decontaminated. Work area is isolated with hard fencing and PVA compressed plastic sheets. Air monitoring was in place. Pure contracting done an inspection etc. Results came back, and asbestos was negative.

Close out documentation for either incident or confirmation of communication / reporting to Savills or the Department Education was not sighted during the audit.

Previous dealings with the DP&E Compliance Team have identified that an incident is defined as: “an occurrence or a set of circumstances that causes or threatens to cause material harm”. Based on this definition, the proponent has not identified any occurrences or a set of circumstances on the project required to be reported.

3.14. Actual Verses Predicted Environmental Impacts

The following section addresses the perceived impacts and suggested mitigation and management measures from the EIS versus actual impacts and mitigation measures implemented as part of the project delivery.

Following review of the EIS recommendations and findings of the project audit, it has been determined that predicted impacts align with the nature scale and extent of works observed on site.

Site activities and management plans / control documentation needed to address the predicted impacts was evidenced, however, some expected documentation was not identified i.e. a hazmat register for the building, procedures for managing special wastes (storage/disposal of Ardex™ chemical drums [refer to Appendix C Photolog], and PCB contaminated soils), and identification and communication of bushfire risk and performance of construction activities comprising hot works.

A more detailed summary is provided in Table 9.

Table 9 Actual Versus Predicted Environmental Impacts

EIS Component	Approval ID	Assessment of actual versus actual impacts
Waste - EIS Section 3.5 State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55) – EIS Section 5.4 Construction & Demolition Waste Management Plan – Appendix T	B14, B15, B16, B29, C38	<p>Section 3.5 of the EIS points to, but does not identify, Australian Standards, conditions of consent and measures outlined in the Construction & Demolition Waste Management Plan (Appendix T) “to ensure all waste is carefully removed, packaged and transported from the site to an appropriate waste facility. This will minimise potential contact with the waste and reduce environmental risk from an accidental release.”.</p> <p>Appendix T identifies 407 m³ of asbestos materials in the site demolition waste stream. It further identifies that “a separate asbestos management plan will be produced”. There is no consideration of hazardous materials waste management other than for asbestos.</p> <p>A Preliminary Environmental Site Assessment was undertaken as part of the initial contamination assessment for consideration during the EIS. The report concluded that: “A <i>hazardous building material assessment should be undertaken prior to any refurbishment works. An asbestos register for the buildings may already have been completed.</i>”</p> <p>A hazardous materials building assessment report has not been sighted as part of this audit. Although an asbestos identification analysis report was sighted.</p> <p>No specific procedures for the management of PCB wastes or waste Ardex™ drums have been identified for consideration.</p>
Bushfire – EIS Section 7.11 and Table 8 Section 9	B35	<p>The preparation of a Bush Fire Emergency Management and Evacuation Plan was suggested by the EIS.</p> <p>A Bush Fire and Flood Emergency Response Sub-Plan was prepared by EFWF Consulting Engineers to satisfy CoC B35. Although the content of the plan generally complies with the</p>

EIS Component	Approval ID	Assessment of actual versus actual impacts
		<p>requirements of CoC B35, consultation with SES which had not been initially evidenced.</p> <p>The potential impact identified in the EIS is accurate, however, it lacks a consideration of the potential impact for construction hot works to be an ignition source for bushfire within the site and therefore subsequent site controls are absent, i.e. identification of bushfire risk on a daily basis, integration of this into pre-start risk advisory notices and inclusion on the site risk board as well as consideration of elevation of controls for performance of hot works based on escalating fire risk or total fire ban days.</p>
Noise and Vibration – EIS Section 7.10 and Table 8 Section 9	B31	<p>The EIS concluded that a Noise and Vibration Management Plan should be developed for the project.</p> <p>A Construction Noise and Vibration Management Sub-Plan prepared by Acoustic Logic complies with CoC B31 and noise monitoring results identified general compliance with occasional exceedances and occasional noise peaks outside of approved construction hours. No review or analysis of these results to interpret any site response was provided as part of the Marshall Day report.</p> <p>Elevated noise levels were recorded on the project site before approved construction start times on the following days: Friday 07 December (Logger 3) before 8am; Saturday 08 December (Logger 2) before 7am; Saturday 08 December (Logger 3) before 7am; Sunday 09 December (Logger 3) for a period between 6am and 7am (NB no construction authorised on Sundays); Monday 10 December (Logger 4) before 7am; Thursday 13 December Logger 4 recording was disturbed just after 6am and resumed shortly before 9am.</p> <p>"Highly Noise Affected" levels LAeq >75dB(A), were noted to have occurred on the following days: Saturday 08 December at Logger 2, 6:30am - 7am; Wednesday 12 December at Logger 1, 8am - 10am and 12pm - 3pm; Thursday 13 December at Logger 1, 8am - 3pm; and Thursday 13 December at Logger 4, 11am - 3pm.</p> <p>In the absence of analysis of the recorded results there is no confirmation provided of likely sources of noise generated out of hours, and no ability to demonstrate noise sources did not originate from the work site where the site has been accessed outside of nominated construction commencement hours.</p>

3.15. Site Inspection

Site inspections as part of the audit were undertaken on 11th and 13th of December as well as the 4th January 2019. During the site inspections, observations on the project's environmental performance (Section 3.10) were made and captured by site photos. The reviewing of documentation and EMS components, where available, was also undertaken to identify potential environmental and operational risks (Section 3.9).

Environmental performance was observed to be generally acceptable.

Review of documentation identified an absence of change management processes and the tracking and monitoring of corrective actions across the project. For instance, a number of ErSed controls were observed on the 11th and 13th December requiring corrective actions. On returning to site on the 4th of January no corrective actions had been undertaken to address these observations.

3.16. Site Interviews

The personnel listed in Section 3.4 were interviewed during the three site visits to the project site.

Site interviews on the 11th and 13th December were generally structured around the SSD CoC and how the project demonstrates compliance with each of those conditions, and assessing understanding of environmental risk and performance management requirements on site, on the basis of reviewed EIS content and expected EMS elements (i.e. aspects/impacts register).

Following review of information gathered during the previous site visits on the 11th and 13th December, the site interviews conducted on the 4th of January targeted specific documentation processes and site procedures pertaining to environmental management on-site.

Overall, the site interviews demonstrated that the project personnel generally had a good understanding of environmental risks and controls associated with the project with the exception of bushfire management. In this instance, staff interviewed had identified the site as being their first construction site with a significant bushfire risk.

The site interviews also indicated an absence in clarity of how an EMS should be implemented at project level and its interrelationship with site EMPs. This was particularly relevant with respect to communication and management of change where interviewees were asked to describe a process to document/record, communicate, and assign management measures/actions to manage change on the project. While processes were described, they did not link back to an integrated management system including reference to the legal requirements register or aspects impacts register to inform the process.

3.17. Previous Annual Review or Compliance Report Recommendations

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

3.18. Improvement Opportunities

Improvement opportunities for 7 conditions of consent were identified during the audit. These are summarised in Table 10 (below). Consideration of these suggestions may enhance site environmental performance.

Table 10 Improvement Opportunities vs Prescribed CoCs

Condition Reference	Improvement Opportunity
A21 Applicability of Guidelines	Reference to guidelines, Codes of Practice, protocols, Standards or policies of particular relevance to the site and project should be documented within a Legal Requirements Register for ease of reference to baseline versions at time of consent.
AN1 Advisory Notes	Maintaining an up-to-date site/project focussed legal requirements register to enable monitoring and performance assessment against regulatory obligations.
B26 Biodiversity	<p>There is no verification of implementation of the documented process to demonstrate how clearing activities are being monitored and managed week to week. Some tree reports identify a potential change to the total number of trees removed, but no indication of where this quantum is tracked or communicated.</p> <p>Final report by Kleinfelder expected to provide quantification against CoC prescription of 1.74 ha, however, proactive change management identifying any additional clearing requirements or loss of vegetation (ie storm or safety related) and notifications would be of benefit rather than being left to the end of clearing report where specific knowledge or actual record may be lost.</p>
B30 Construction Traffic and Pedestrian Management Sub-Plan	Noted that in CTPMSP Section 1.5 Objectives includes “to satisfy the key legal requirements related to Traffic, Transport and Access to site” and to “ensure compliance with relevant specification and the RMS – Traffic Control at Work Sites Handbook Version 4”, yet these are not specified further and not recorded in a legal requirement register for the site/development.
B31 Construction Noise and Vibration Management Sub-Plan	The project has four avenues for complaints (Taylors’ directly, 1800 number, SI Feedback and LLV direct email). This may result in not all complaints being documented and effectively closed out. Taylors’ complaints register has a single complaint whereas the SINSW complaints register online has four. All complaints registered should be reviewed regularly to enable consolidation of all project complaints so they can be efficiently managed and closed out and any corrective actions systemically implemented across the site.
C28 Erosion and Sediment Control	An approach to detail, record and monitor the implementation and close out of environmental preventive and corrective actions would be beneficial.

Condition Reference	Improvement Opportunity
	During the site audits on 11 th and 13 th December, a number of ErSed controls were observed requiring attention that were not addressed by 4 th January despite expected identification within daily walkovers and documented weekly site inspections having been undertaken.
General Observation	Where a plan or document is approved but amendments/additions are requested, include tracking to demonstrate the amendment/addition has been effected and current document is issued for reference.

A summary of improvement opportunities with respect to the implementation of an EMS are summarised in the table below (Table 11).

Table 11 Improvement Opportunities VS EMS Components

EMS Component	Improvement Opportunity
Legal Requirements Register	A current and up-to-date and current legal register should be developed specific to the site and project.
Aspects/ Impacts Register	A current Aspect/Impacts register should be developed for the project to support risk assessment, change management and communications and training.
Roles and Responsibilities	Project should consider consolidating roles and responsibilities provided in the CEMP and PEMP, and better defining the roles and responsibilities assigned to site environmental management activities for the project.
Training	Project should consider the implementation of a formal training register that can demonstrate undertaking of environmental training on the project. Particularly in respect of specialist roles/responsibilities (eg tree clearing and hazardous waste management/removal)
Monitoring and Review	The implementation of a formal program or process to monitor and review the project EMS, updates to EMPs and site environmental performance information (eg noise monitoring data) should be considered.
Communications	A process to formally communicate, track and monitor corrective actions as well as the communication of change management should be considered. While the project demonstrated that regular environmental site inspections have been undertaken it was not demonstrated how follow-up / corrective actions were being, tracked, monitored or communicated at project and systemic level to increase awareness, enhance risk assessment processes and prevent recurrence.

A summary of improvement opportunities for Environmental Aspects are provided in Table 12 (below).

Table 12 Improvement Opportunities vs Environmental Aspects

Environmental Aspect	Requirement
Land (ErSed)	An approach to detail, record and monitor the implementation and maintenance of environmental controls as preventative and corrective actions would be beneficial to enhance site performance.
Land (contam)	A process to record unexpected finds needs to be established and updated for future reference. This could be in the form of a register or site map.
Water	Attention to maintenance of ErSed controls is required across the site.
Waste	Confirmation records of any special waste disposal should be maintained separately (i.e. PCB contaminated soils and Ardex drums in accordance with PCB Chemical Control Order or MSDS respectively).
Heritage	A formal process for the tracking and monitoring the condition of heritage items removed or remaining in-situ on the project should be considered.

3.19. Key Strengths

Throughout the audit process the site demonstrated a generally good level of housekeeping (site inspections). The key strength demonstrated at site level was the project's ability to communicate and manage high-risk activities between simultaneous operations via the daily pre-start notifications and high-risk whiteboard.

Although some environmental issues were observed requiring corrective actions, at no time during the site inspections were unsafe actions or activities observed. This is a testament to the diligence and attention provided by the project delivery team, given the accelerated timeframe facing the contractors and the delivery team to ensure project handover for the milestone date at the end of January.

4. RECOMMENDATIONS

4.1. Non-Compliance Recommendations

A total of 5 non-compliances were assigned to the project. These non-compliances can be categorised into three main areas:

- ***Documentation and verification of evidence***
- ***Commencement of construction in advance of instrument approval***
- ***Commencement of instrument outside of designated notification period***

Due to an acceleration project delivery schedule, 4 non-compliances can be attributed to timing and commencement of construction. The other non-compliance can be attributed to the absence of documented and verified evidence. A summary of these management areas with the assigned CoC is provided in Table 13 (below).

Table 13 Non-Compliance Classifications

Approval (ID)	Management area / classification
A23 Access to Information	Documentation and verification of evidence
B21 Community Communication Strategy	Commencement of construction in advance of instrument approval
B55 Compliance Reporting	Commencement outside of designated period / timeframe
B56 Independent Environmental Audit	Commencement outside of designated period / timeframe
B57 Independent Environmental Audit	Commencement outside of designated period / timeframe

It is key that the Project continues to document and confirm relevant certifications and approvals with the relevant approval authority and / or certifier.

4.2. Improvement Opportunities Recommendations

A total of 7 improvement opportunities were assigned to the project's performance against the prescribed CoC. From a systemic perspective, these improvement opportunities can be broadly classified into the following management areas:

- ***Implementation of Legal Requirements Register; and***
- ***Monitoring and measurement of environmental performance***

These findings were further consolidated by the high-level EMS review which identified another 6 improvement opportunities, pertaining to:

- ***Implementation of Legal Requirements Register;***
- ***Implementation of Aspect/Impacts Register;***
- ***Consolidation of Roles and Responsibilities;***
- ***Documentation of training and induction records;***
- ***Monitoring and measurement of environmental performance; and***
- ***Implementation of Change Management Process***

A review of management measures implemented to manage risk associated with environmental aspects on the project, an additional 5 improvement opportunities were identified. These improvement opportunities were attributed to:

- ***Monitoring and measurement of environmental performance;***
- ***Documentation of Training and Induction;***
- ***Implementation of Change Management Process; and***
- ***Documentation and Maintaining of Records***

An overview of these improvement opportunities is provided in Table 14 (below).

Table 14 Improvement Opportunities Classifications

Approval ID	Improvement opportunity classification
A21 Applicability of Guidelines	Implementation of Legal Requirements Register
AN1 Advisory Notes	Implementation of Legal Requirements Register
B26 Biodiversity	Monitoring and measurement of environmental performance
B30 Construction Traffic and Pedestrian Management Sub-Plan	Implementation of Legal Requirements Register
B31 Construction Noise and Vibration Management Sub-Plan	Monitoring and measurement of environmental performance
C28 Erosion and Sediment Control	Monitoring and measurement of environmental performance
C40 Incident Notification, Reporting and Response	Monitoring and measurement of environmental performance
Legal Requirements Register (EMS)	Implementation of Legal Requirements Register
Aspects/ Impacts Register (EMS)	Implementation of Aspect/Impacts Register
Roles and Responsibilities (EMS)	Consolidation of Roles and Responsibilities
Training (EMS)	Documentation of training and induction records
Monitoring and Review (EMS)	Monitoring and measurement of environmental performance
Communications (EMS)	Monitoring and measurement of environmental performance Implementation of Change Management Process
Land (ErSed) (Environmental Aspect)	Monitoring and measurement of environmental performance

Approval ID	Improvement opportunity classification
Land (contam) (Environmental Aspect)	Documentation of Training and Induction Monitoring and measurement of environmental performance Implementation of Change Management Process
Water (Environmental Aspect)	Monitoring and measurement of environmental performance
Waste (Environmental Aspect)	Documentation and Maintaining of Records
Heritage (Environmental Aspect)	Monitoring and measurement of environmental performance

5. CONCLUSION

This Independent Audit Report satisfies the requirements of SSD 8114 condition of consent B57. The audit has been conducted in accordance with the Department of Planning and Environment's *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 of:

- A pre-site audit documentation review, site opening meeting and audit (conducted on the 11th and 13th of December 2018 and the 4th of January 2019);
- Post-site audit documentation review and follow up including closing meeting;
- Issuing of draft audit report;
- Post-Draft Audit report review and provision of additional documentation;
- Issuing of Final Report (this report)

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.

Non-compliances were identified in respect of:

- Absence of publication of documentation;
- Commencement of construction in advance of some of the requirements under the consent; and
- Commencement of an activity outside of prescribed period.

Improvement opportunities and observations were identified pertaining to:

- Documenting legal requirements;
- Documenting a risk-based approach to support compliance demonstration with procedural requirements of the CEMP;
- Need for progressive recording of environmental site performance and management of change as well as linking these both to a higher-level risk assessment (eg aspects/impacts register) and communication of change;
- Aligning site documentation to be reflective of the SSD 8114 prescribed content expectations;
- Procedural requirements of the CEMP, specifically the management of hot works on site and managing site awareness notifications for bushfire danger levels that may have implications for conduct of high-risk activities on site;
- Management and implementation of the Asbestos Management Plan with respect to the site structures / built-form, and consideration of statutory requirements pertaining to communication (i.e. labelling) and consultation in the workplace, and in advance of project handover;
- Collation of third-party reference documentation; and
- Clear integration of requirements across management systems and work practices, including nominated roles and responsibilities.

The audit concludes that the Lindfield Learning Village project is generally being undertaken in compliance with the requirements of SSD 8114.

APPENDIX A - AUDIT PROTOCOL AND FINDINGS



Dates of Audit 11/12/18; 13/12/18; 4/1/19
Auditors Richard Johnson; Norman McComb
Location Lindfield Learning Centre, Ku-Ring-Gai

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 manged on site and generally confined to site. Record of incidents/complaints.	A number of minor dust generating occurrences were observed during the site audit on the 13th December. These acivities included stockpiling and excavator activities, although minor in nature. During the site visit on the 13th December, stockpilies at to the rear of the site were observed to be covered by poly and geofabric sheeting. The stockpiles were observed to be dry.	Whilst measures were taken to control dust emissions from static stockpiles by covering, dust supression (wetting down) on loose dirt areas of the site was not observed. Emissions observed to be confined to site.			
Noise	Work hours are within approved hours. Noise mititgation evident. Record of incidents/complaints.	The site access log book was obseved 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.			
Land (ErSed)	Sediment and erosion controls are performing to control surface erosion and discharges from site wihtin acceptable limits. Record of incidents/complaints.	A number of ErSed controls requiring attention and maintenance were observed across the three site audit visits,on 11 and 13 December, and 4th January. A weekly environmental inspection checklist (10 - 15 December) refers to sediment control "Are all sediment control measures followed , as per sediment control plan?" There was no evidence to suggest corrective actions were taken to address the ErSed controls identified as needing attention within the site inspection components of the audit. While some ErSed controls internal to the site were observed to require more routine maintenance to maintain their integrity, 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. It was noted during the inspection of the 4/1/19 that some vegetation management of storm affected trees had resulted in impact to some of the internal site ErSed controls.	An approach to detail, record and monitor the implementation and maintenance of environmental controls as preventative and corrective actions would be beneficial to enhance site performance.			
Land (contam)	Any identified contaminant materials are effectively contained, controlled and removed from site for treatment and disposal. Record of any unexpected finds.	An unexpected finds procedure is provided within the RAP for the site. Where unexpected contamination has bee encountered Taylors have engaged a specialist Environmental Consultant to monitor works and provide clearance certificates. Records sighted of EIS field validation inspection (reference EIS Job No: E30259KD, dated 13/11/2018). No indication as to how this information was being recorded or controlled within the project management system.	A process to record unexpected finds needs to be established and updated for future reference. This could be in the form of a register or site map.			
Water	Site surface water is managed to prevent scouring of banks of receiving waters. Clean water is separated from dirty water (ie construction works contact water). Spill Notifications. Record of incidents/complaints.	There was no evidence of scouring, or rill erosion on the project. The project did not have any reported spill incidents or any water related incidents.	Attention to maintenance of ErSed controls is required across the site.			
Waste	Containment and appropriate sorting of waste as appropriate. Record of incidents/complaints.	All bins were observed on site were well maintained and waste appeared to be segregated appropriately. The Taylors' project team receives monthly reports on waste volumes and classification.	Waste management measures for the site are satisfactory. Confirmation records of any special waste disposal should be maintained separately (ie PCB contaminated soils and Ardex drums in accordance with PCB Chemical Control Order or MSDS respectively).			



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
				Compliant	Non-compliant	Not Triggered
Heritage	Clear identification of heritage items and demarcation within the construction site to prevent accidental harm.	<p>Heritage items to be retained have been removed and stored in a secure location.</p> <p>Remaining items in-situ have been colour coded/tagged in accordance with their heritage status.</p> <p>There was no initial observed evidence of demarcation or protection measures to protect in-situ heritage items during the audit.</p> <p>Demonstration of restriction of access to heritage items by means of cover protection to seating was demonstrated by the project team during the site closure meeting.</p>	As an improvement opportunity, the project team could track and monitor the condition of heritage items removed or remaining in-situ to affirm suitability of protection measures.			
Traffic	Traffic management, access and flow is maintained. No tracking of soil/muds onto public roads. Record of incidents/complaints	<p>The tracking of soil / muds to public roads was not observed during the site audit dates.</p> <p>The project has traffic control subcontractors managing the flow of vehicles around the site entry and local roads.</p> <p>The NSW Department of Education – School Infrastructure online complaints register has a Traffic Complaint logged 12 December. The complaint is still being investigated.</p> <p>A delivery log dated 5th December 2018 was sighted identifying control of materials delivery and site co-ordination for reception of the delivery.</p>	Site traffic measures for the site are considered satisfactory			
Flora/Fauna	Pre-clearing checks undertaken. Demarcation of no-go zones. Record of incidents/complaints.	<p>This area is solely managed by Kleinfelder.</p> <p>Tree taggings and markings were observed across the project site that identified trees to be retained, removed or containing nests.</p> <p>Demarcation of no-go zoning was observed in the area to the front and eastern side of the main school building. Tagging alone was used for trees in the eastern car park and to the south of the main building.</p>	Control measures implemented to manage the project risks associated with flora and fauna are generally acceptable. However, there were instances when demarcation of no-go zoning was inconsistent across the project.			
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.	<p>A legal register for the project was sighted but this did not have any entries.</p> <p>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.</p> <p>Conditions of approval contained in Council approval of works in the public road (s139 Roads Act), dated October 2018 and November 2018 respectively, should be recorded.</p> <p>A Legal Register was provided by Taylors during the closing audit meeting. The excel copy of the register was last updated 30/10/09 (footer) although it does include Protection of the Environment Operations Amendment (Scheduled Activities and Waste) Regulation 2008, 2011 amendment.</p>	<p>An up-to-date and current legal register tailored to the project was not sighted during the audit.</p> <p>Some observations for update of the legal register include: (i) Register references Department of Environment and Climate Change (DECC). The register should reference NSW EPA; (ii) No mention of Rural Fires Act; (iii) Pesticides Act doesn't reference the use of herbicides and associated controls; iv) identifies as unlikely the ability for Taylor to generate asbestos or PCB wastes.</p> <p>Adequacy of the project's performance in line with this EMS management area was demonstrated, noting there are areas for improvement in respect of currency of references and application to site specifics.</p>			
Aspects/ Impacts Register	Identification of the Projects environmental aspects and impacts with identificaton of those aspects/Impacts of high significance to the project.	<p>An Aspects/Impacts register was not sighted for the project. A daily risk register noticeboard was observed on each day of auditing. Pre-work risk reviews were indicated as being undertaken and issued to contractor teams each afternoon to inform their respective Toolbox talks and pre-starts the following day.</p> <p>It was identified that there was no provision for review of bushfire risk levels within the declared bushfire season and associated communications to contractor staff to enable adjustment of site activity. A total fire ban was declared for Sydney on 2 November 2018.</p> <p>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.</p>	<p>A project aspects/impacts register which feeds into the site risk register should be developed that references the Project's significant aspects/impacts.</p> <p>Adequacy of the Project's performance in line with this EMS management area cannot be demonstrated.</p>			



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Roles and Responsibilities	Identification and allocation of roles and responsibilities to relevant site and management personnel to provide effective site environmental management and performance.	<p>The CEMP outlines roles and responsibilities of "various project personnel" and "site staff" generally. Site supervisory staff and the HSE Officer are identified as being responsible for weekly environmental checklist completion. Roles and responsibilities are also outlined in Taylors' Project EMP (PEMP).</p> <p>A number of discrepancies of assigned roles and responsibilities between the two plans were noted: (1) Additional personnel are included in the PEMP, The Chief Operating Officer (COO) and General Manager (GM) for Fitout and Refurbishment. (2) It's not apparent where the PEMP responsibilities relating to the COO and GM are picked up in the CEMP and how these are communicated at project / site level. (3) Responsibilities assigned to the Construction Manager in the PEMP differs from CEMP (prepared by Zoic) responsibilities. (4) The PEMP refers to Project Safety Advisor, and the CEMP refers to Site HSE Officer. (5) The responsibilities assigned to the 'Project Safety Advisor' and the 'Site HSE Officer' vary, with little overlap in responsibilities assigned.</p> <p>During the site audit there was no clear indication of a linkage between on-site activities and change management responsibilities assigned to project personnel.</p> <p>The PEMP prepared by Taylors talks to their internal EMS. This has not been captured by the CEMP.</p> <p>Reliance was on the project CEMP (prepared by Zoic) as the reference for site control measures, not the PEMP (prepared by Taylors).</p> <p>There was no mention or recognition of EMS</p>	<p>Audit findings would suggest general compliance with this EMS management area however, it would be beneficial to have better defined roles and responsibilities assigned to site environmental management activities. This would provide more clarity and certainty to project and site staff and contractors.</p>			
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.	<p>No specific training records were sighted.</p> <p>No Aspects/Impacts register sighted.</p> <p>Legal requirements register was blank.</p> <p>Environmental awareness was included in site induction process (SE-F-11 Rev January 2018), however the environmental induction material content was not provided. Environmental awareness on the Induction form referred to Control of hazardous substances entering storwater drains and waterways, Asbestos Removal to be carried out by licenced removalists, Bushfire Danger Period, and compliance with "CEMP plan" at all times.</p>	<p>An implemented EMS should provide a relevant and up to date legal register and an Aspects/Impacts register relevant for site operations and activities.</p> <p>The site induction should at least provide an overview of environmental risks and controls relevant to the project site. The induction does not refer to waste management controls, potential for ground contaminants, unexpected finds (heritage or contaminants), erosion and sediment controls, construction work hours, tracking of mud, tree management and bushfire awareness.</p> <p>There was also no clear indication of a linkage between on-site activities and change management processes and overarching EMS elements, for instance what to do for an environmental incident. Reliance was on the project CEMP as the reference for site control measures.</p> <p>Adequacy of the project's performance in line with this EMS management area cannot be demonstrated.</p>			
Monitoring and Review	Program and process for monitoring and review of the Project EMS to demonstrate applicability.	<p>An environmental monitoring program was not sighted for the project.</p> <p>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.</p>	<p>The project has not demonstrated a formal or informal program or process for monitoring and review of the Project EMS,.</p>			



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Communications	Identification of how the EMS is implemented during the course of the project, including the communication of change and access to information.	<p>The project team has demonstrated effective retention and accessibility to documentation of records via the implementation of the Aconex system. However there doesn't appear to be any means to document and track change management regarding environmental risks and enabling a feedback loop into site communications, training and controls.</p> <p>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 but no demonstrated process to check on the the implementation of actions on the follow-up of site inspections.</p>	While the project demonstrated that regular environmental site inspections have been undertaken and that these feed into the daily pre-work briefings to contractors, it was not demonstrated how follow-up / corrective actions were being, tracked, monitored or communicated at project level to inform systemic aspect/impact risk assessments or to drive a change in approach to reduce risk.			
Conditions of Consent- 24/10/18						
Part A Administrative						
	Obligation to Minimise Harm to the Environment					
Schedule 2 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				
	Terms of Consent					
Schedule 2 A2	<p>The development may only be carried out:</p> <p>(a) in compliance with the conditions of this consent;</p> <p>(b) in accordance with all written directions of the Planning Secretary;</p> <p>(c) generally in accordance with the EIS (relating to Phase 1), Response to Submissions (relating to Phase 1) and Supplementary Response to Submissions;</p> <p>(d) in accordance with the approved plans in the table below identified as Phase 1:</p> <p>DA-100 Rev J Site Plan 08/06/2018</p> <p>DA-102 Rev D Phase 1 Site Plan 08/06/2018</p> <p>DA-112 Rev A Phase 1 Proposed Floor Plan Level 2 06/06/2018</p> <p>DA-113 Rev C Phase 1 Proposed Floor Plan Level 3 06/06/2018</p> <p>DA-114 Rev D Phase 1 Proposed Floor Plan Level 4 06/06/2018</p> <p>DA-115 Rev E Phase 1 Proposed Floor Plan Level 5 06/06/2018</p> <p>DA-116 Rev E Phase 1 Proposed Floor Plan Level 6 06/06/2018</p> <p>DA-117 Rev B Phase 1 Proposed Floor Plan Level 7 01/06/2018</p> <p>DA-118 Rev B Phase 1 Proposed Floor Plan Roof Level 07/05/2018</p> <p>DA-300 Rev J North & South Building Elevation 04/05/2018</p> <p>DA-301 Rev J East & West Building Elevation 04/05/2018</p> <p>DA-400 Rev H Building Sections - Sheet 1 04/05/2018</p> <p>DA-401 Rev H Building Sections - Sheet 2 04/05/2018</p>	<p>Items (a) to (c) verified through site observation during site audit inspections on 11/12/18; 13/12/18; and 4/1/19, site interviews on the same dates with Taylors' supervisory staff and HSE Officer, interviews with Savill's Project Management team (4/12/18) and document review.</p> <p>Item (d) not verified at this stage of the development.</p>				
Schedule 2 A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: <p>(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</p> <p>(b) the implementation of any actions or measures contained in any such document referred to in (a) above.</p>	N/A	Not triggered			
Schedule 2 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)(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c)(d), 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					
Schedule 2 A5	This consent lapses five years after the date of consent unless the works associated with the development have physically commenced.	N/A	Not triggered			
	Student Numbers					
Schedule 2 A6	This partial consent relates to Phase 1 of the development only, which is to accommodate 350 enrolled students.	N/A	Not triggered			
	Artificial Surfaces					



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Schedule 2 A7	There must be no external use of artificial turf or synthetic play surfaces on the site, unless a Stormwater Management Plan is prepared and approved by the Planning Secretary detailing how stormwater will be treated prior to it being discharged into the National Park.	Taylor's confirmed artificial turf or synthetic play surfaces will not be installed on site.				
	Design Modifications					
Schedule 2 A8	The rooftop Covered Outdoor Learning Area and associated screens and playground are not approved and amended plans must be submitted to the Planning Secretary and Certifier.	N/A	Not triggered			
Schedule 2 A9	The fire isolated stair extension to the eastern side of the existing building is not approved and amended plans must be submitted to the Planning Secretary and Certifier.	N/A	Not triggered			
	Prescribed Conditions					
Schedule 2 A10	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					
Schedule 2 A11	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			
	Long Service Levy					
Schedule 2 A12	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.	Compliant			
	Legal Notices					
Schedule 2 A13	Any advice or notice to the consent authority must be served on the Planning Secretary.	N/A	Not triggered			
	Evidence of Consultation					
Schedule 2 A14	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 to the Planning Secretary/Certifier for information/approval; 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 has been logged by Savills on the Aconex system.	Consultation with identified parties for a number of individual CoCs was sighted in correspondence following the closing Audit meeting. These consultation tables in addition to the Aconex system demonstrates that the project is generally compliant with this condition.			
	Staging, Combining and Updating Strategies, Plans or Programs					
Schedule 2 A15	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 or program 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 or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	No strategy or plans identified as being staged.				
Schedule 2 A16	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	No strategy or plans identified as being staged.				
Schedule 2 A17	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	No strategy or plans identified as being updated.				
	Demolition					
Schedule 2 A18	Demolition work must comply with Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier before the commencement of works.	Demolition works were carried out under the REF as exempt works.	Not triggered			
	Structural Adequacy					
Schedule 2 A19	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. Notes: Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	Letter sighted from BCA Logic dated 1/11/18 confirming acceptance of submitted documentation under the SSD Conditions of Consent requiring acceptance by the Certifying Authority.				



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	External Walls and Cladding					
Schedule 2 A20	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	Letter from BCA (1 November 2018) for all approved conditions requiring certification has been accepted by approved certifier.				
	Applicability of Guidelines					
Schedule 2 A21	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. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	No directions issued by Planning Secretary.	Reference to guidelines, protocols, Standards or policies should be documented within a Legal Requirements Register for ease of reference to baseline versions at time of consent would be of benefit.			
	Monitoring and Environmental Audit					
Schedule 2 A22	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing.	N/A	Not triggered			
	Access to Information					
Schedule 2 A23	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: (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 environmental 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.	No documentation publicly available on Applicant's website (as accessed 8/1/19), except access to complaints register and heritage information. https://www.schoolinfrastructure.nsw.gov.au/projects/l/lindfield-learning-village.html Link is provided to SSD EIS and approval documentation on DP&E website, but does not include strategies, plans and programs required under the conditions of consent or other documentation. Current stage and progress of the development does not provide clear indication of actual current stage and progress (as of 8/1/19). Contact details are provided for feedback and enquiries. Complaints register (update dated 17/12/19) is accessible for review.	Documentation publication requirements of the condition are not being fully met at time of audit. Line item (a): (i) Website does not provide all documents listed in A2 of SSD CoC. (iii) all approved strategies, plans and programs required under the conditions of this consent. Following CoC are referenced for relevant approved documents: B16 Remediation Action Plan (RAP) B29 Construction Environmental Management Plan			
	Signage					
Schedule 2 A24	Building identification signage is not approved as part of this consent	N/A	Not triggered			
	Historic Heritage					
Schedule 2 A25	The following heritage elements must be retained: (a) Extant timber ceiling of the existing library area; (b) The spiral stairs towards the southern boundary of the building; (c) All internal and external built in bench seating in communal areas; (d) All original spherical light fittings in communal/public areas within the site; and (e) Planter boxes on roof terraces.	Items (a) to (d) observed as retained during site inspection component of the audit. Roof terrace not accessed during inspections. Identification of items to be retained and retained in situ were identified.				
	Advisory Notes					

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Schedule 2 AN1	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	<p>Legal requirements register provided and sighted, but not populated which would assist in maintaining visibility of renewal, reporting and compliance requirements.</p> <p>Conditions of approval contained in Council approval of works in the public road (s139 Roads Act) for Footpath works (October 2018) and external works (November 2018) should be recorded.</p> <p>Audit consultation with Council re: site performance has indicated satisfaction with performance.</p> <p>No reference made during site interviews to an over-arching EMS that provides guidance on typical legal requirements for construction projects.</p>	<p>Condition is generally compliant.</p> <p>There would be benefit in maintaining an up to date legal requirements register to enable monitoring and performance assessment against regulatory obligations.</p>			
Schedule 2 AN2	Pursuant to section 4.16(4)(c) of the Act, this partial consent is granted only for Phase 1 of the development referred to in the development application, on the conditions set out in this consent.	N/A	Not triggered			
Schedule 2 AN3	Development consent is required to carry out Phases 2 and 3 of the development referred to in the development application.	N/A	Not triggered			
Prior to Commencement of Construction						
Notification of Commencement						
Schedule 2 B1	<p>The Department must be notified in writing of the dates of commencement of physical work and operation at least 48 hours before those dates.</p> <p>If the construction or operation of the development is to be staged, the Department must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.</p>	<p>Notification from Taylors to Savills (30/10/18) and Savills to DoE (30/10/18) for the commencement of works in accordance with Conditions provided.</p> <p>DoE correspondence dated 30/11/18 identifies issue of notice to commence works issued to DPE on 2/11/18.</p> <p>Date for commencement of physical SSD works is identified as 11/11/18.</p> <p>Official notification from DoE to DPE for staged commencement date</p>	General compliance with this condition has been demonstrated.			
Certified Drawings						
Schedule 2 B2	<p>Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with:</p> <p>(a) the relevant clauses of the BCA; and</p> <p>(b) this development consent.</p>	Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) affirming all approved conditions requiring certification have been accepted by approved certifier.	General compliance with this condition has been demonstrated.			
External Walls and Cladding						
Schedule 2 B3	<p>Prior to the commencement of construction, the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.</p> <p>The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.</p>	Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) affirming all approved conditions requiring certification have been accepted by approved certifier.	General compliance with this condition has been demonstrated.			
Protection of Public Infrastructure						
Schedule 2 B4	<p>Before the commencement of construction, the Applicant must:</p> <p>(a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;</p> <p>(b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</p> <p>(c) submit a copy of the dilapidation report to the Planning Secretary, Certifier and Council.</p>	<p>a: Consultation documented in Savills letter to DoE dated 6/11/18</p> <p>b: Savills letter to DoE dated 6/11/18 identifies dilapidation report prepared by Project Solutions dated 3/7/18</p> <p>c: Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) for all approved conditions requiring certification has been accepted by approved certifier.</p>	<p>As referenced in the sighted correspondence, compliance with the condition has been met.</p> <p>The dilapidation document itself was not sighted.</p>			
Bush Fire						



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Schedule 2 B5	Prior to the commencement of construction, a detailed design for the upgrade of existing roads between the existing bus stop loop and the site (including internal roads within the site and excluding Dunstan Grove) must be certified by an appropriately qualified person and submitted to the Planning Secretary. The detailed design must demonstrate compliance with section 4.2.7 of Planning for Bush Fire Protection 2006, including: (a) Internal roads must be two-wheel drive, sealed, all-weather roads; (b) Internal perimeter roads must be provided with at least two traffic lane widths (carriageway 8 metres minimum kerb to kerb) and shoulders on each side unless an alternative solution is agreed by RFS), allowing traffic to pass in opposite directions; (c) Dead end roads must incorporate a minimum 12 metre outer radius turning circle and must be clearly sign posted as a dead end; (d) Traffic management devices must be constructed to facilitate access by emergency service vehicles; (e) A minimum vertical clearance of 4 metres to any overhanging obstruction, including tree branches, must be provided; (f) Curves must have a minimum inner radius of 6 metres and must be minimal in number to allow for rapid access and egress; (g) The minimum distance between the inner and outer curves must be 6 metres; (h) Maximum grades must not exceed 15 degrees and average grades must not be more than 10 degrees; (i) Roads must not traverse through land potentially subject to periodic inundation (other than flood or storm surge); (j) Roads must be clearly sign posted and bridges must clearly indicate load ratings; and (k) The internal road surfaces and bridges must have a capacity to carry fully-loaded fire fighting vehicles (15 tonnes).	Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) for all approved conditions requiring certification has been accepted by approved certifier.	General compliance with this condition has been demonstrated.			
Schedule 2 B6	Prior to commencement of construction, detailed fire trail design plans must be certified by an appropriately qualified person and submitted to the Planning Secretary. Designs must be generally consistent with Phase 1 Site Plan prepared by DesignInc Sydney Pty Limited dated 08 June 2018 (Reference Project No. P18-023 and Drawing No. DA-102) and be in accordance with section 4.1.3 (3) of Planning for Bushfire Protection 2006, NSW Fire Trail Standards and address the following: (a) No artificial turf should be used for the proposed fire trails; (b) The proposed fire trail must avoid and minimise where possible, impacts on rocky outcrops and drainage lines; and (c) Suitable arrangement shall be put in place to ensure the ongoing management and availability of fire trails for fire management purposes. The plans are to be certified by an appropriately qualified person and a copy submitted to the Secretary	Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) affirming all approved conditions requiring certification have been accepted by approved certifier. Approval by Backash dated 13 November 2018 "Bushfire Certificate Landscaping and Condition B6, B7, B8, B10, B13".	General compliance with this condition has been demonstrated.			
Schedule 2 B7	Prior to the commencement of vegetation removal, a Vegetation Management Plan (VMP) must be prepared in consultation with RFS for the ongoing maintenance of the proposed APZs, in accordance with the bush fire report prepared by Blackash Bushfire Consulting dated August 2018 (Reference Version 1.3). The VMP must be submitted to the satisfaction of the Planning Secretary.	The Vegetation Management Pan is presented as content within the Landscape Management Plan prepared by Kleinfelder (NCA18R82665, Rev 4 dated 12/11/18) DPE comments of 7/11/18 noted as identifying consultation effort as being demonstrated by obtaining and addressing responses and documenting as a table. Consultation table with RFS prepared by Savills sighted - identifies submission of the completed document for RFS review rather than consultation in its preparation. Noting RFS correspondence of 12/11/18 indicating no comments on the LMP. Approval by Backash dated 13 November 2018 "Bushfire Certificate Landscaping and Condition B6, B7, B8, B10, B13".	General compliance with this condition has been demonstrated.			
Schedule 2 B8	Prior to the commencement of vegetation removal, detailed landscape plans for the IPA must be prepared and certified by an appropriately qualified person demonstrating compliance with Appendix 5 of Planning for Bush Fire Protection 2006 and a copy submitted to the Planning Secretary.	Approval letter sighted. Approval by Backash dated 13 November 2018 "Bushfire Certificate Landscaping and Condition B6, B7, B8, B10, B13" .	General compliance with this condition has been demonstrated.			
Schedule 2 B9	Where the APZs are located in slopes greater than 18 degrees, the APZ must be landscaped or managed (e.g. terracing) with suitable access being provided to the APZ to ensure the ongoing maintenance of the area.	Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) affirming all approved conditions requiring certification have been accepted by approved certifier.	General compliance with this condition has been demonstrated.			

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Schedule 2 B10	The entire site must be managed as an Inner Protection Area (IPA) as indicated in Figure 6 APZ Provision for Phase 1 School in the bush fire report prepared by Blackash Bushfire Consulting dated 9 July 2018 (Reference Version 1.2). The IPA must be managed as outlined in section 4.1.3 and Appendix 5 of Planning for Bush Fire Protection 2006 and the NSW RFS document Standards for asset protection zones.	Certification provided by Blackash (23/10/18) certifying implementation of LMP achieves CoC B10. Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) affirming all approved conditions requiring certification have been accepted by approved certifier.	General compliance with this condition has been demonstrated.			
Schedule 2 B11	Prior to commencement of construction, unless otherwise agreed by the Planning Secretary, suitably worded instruments must be drafted pursuant to Section 88 of the Conveyancing Act 1919 to ensure ongoing management of the proposed APZs within the subject site in perpetuity and in accordance with condition B10. The instrument must be lodged with NSW Land Registry Services and evidence of the lodgement submitted to the Planning Secretary. The NSW RFS must not be beneficiary to this legal instrument.	Construction identified in site interview as commencing 11/11/2018. Executed Positive Covenant sighted (reference AN894063G). NSW LRS receipt dated 29/11/18. Vegetation removal commenced 12 December 2018.	The instrument is dated and registered on 29/11/18, vegetation removal did not commence until 12 december. Compliance with this condition ahas been met.			
Schedule 2 B12	Prior to the commencement of construction detailed plans must be certified by an appropriately qualified person demonstrating that; (a) All elevations and roof of the existing building(s) will be upgraded to comply with sections 3 and 9 (Bush Fire Attack Level (BAL) Flame Zone (FZ) of Australian Standard AS3959- 2009 Construction of buildings in bush fire prone areas or NASH Standard (1.7.14 updated) National Standard Steel Framed Construction in Bushfire Areas – 2014 as appropriate. Except for windows, flaming of the specimen is not permitted and there must be no exposed timber; (b) New construction must comply with Sections 3 and 9 (BAL-FZ) of Australian Standard AS3959- 2009 Construction of buildings in bush fire prone areas or NASH Standard (1.7.14 updated) National Standard Steel Framed Construction in Bushfire Areas – 2014 as appropriate. Except for windows, flaming of the specimen is not permitted and there must be no exposed timber; and (c) A two hour fire rated wall must be constructed internally on proposed levels four, five and six aligned to the 100 metre APZ as measured from the southern boundary, consistent with the drawings prepared by DesignInc dated 8 June 2018 (Project Number P18-023) and the recommendations in section 12 as indicated on Figure 6 APZ Provision of Phase 1 School in the bush fire report prepared by Blackash Bushfire Consulting dated 9 July 2018 (Reference Version 1.2).	Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) for all approved conditions requiring certification has been accepted by approved certifier covers CoC items a - c.	General compliance with this condition has been demonstrated.			
Landscaping						
Schedule 2 B13	Prior to the commencement of vegetation removal, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping works on-site, to the satisfaction of the Planning Secretary. The plan must: (a) ensure no more than 872 trees are removed from the site; (b) identify all existing tree/shrub species to be retained (at least 228 trees must be retained); (c) have regard to the heritage setting of the site; (d) have regard to the bush fire protection measures (B5 - B6); (e) include the entirety of the site (fire trails, footpaths, bus stop etc); (f) identify existing natural features such as rock outcrops; (g) include contour lines and levels; (h) include details of terracing or other slope stability measures; (i) include details for managing stormwater runoff; (j) include native grasses endemic to the locality; (k) detail the species to be planted on-site; (l) describe the monitoring and maintenance measures to manage revegetation and landscaping works; and (m) include details of all boundary and internal fencing constructed of non-combustible materials; (n) include details of any landscape furniture/structures such as seating, lighting etc.	Vegetation removal commenced 12/12/18. The landscape management plan has been produced by Kleinfelder. The plan is originally dated 24/8/18 with the final version (v4) dated 12/11/18 to refelct consultation. Approval by Backash dated 13 November 2018 "Bushfire Certificate Landscaping and Condition B6, B7, B8, B10, B13". LMP submitted by DoE to DPE 1/11/18; 2/11/18 and 19/11/18 reflective of responses to comments received (DPE and RFS).	Correspondence from DPE to Savills on 7/12/2018 suggests that the LMP satisfied condition requirements for the exception of outstanding matters referenced within Schedule 1 of that letter. Savills addressed the Schedule 1 items sent to DoE 19 December (Aconex GCOR-001871). General compliance with this condition has been met.			
Site Contamination						
Schedule 2 B14	Prior to the commencement of external works or vegetation clearing, additional site investigation for contaminants across previously untested areas of the site must be undertaken in accordance with: (a) NSW EPA Sampling Design Guidelines (b) Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017 (c) https://www.epa.nsw.gov.au/publications/contaminatedland/17p0269-guidelines-for-the-nsw-site-auditor-scheme-third-edition (d) Guidelines for Consultants Reporting on Contaminated Sites, 2011 www.epa.nsw.gov.au/resources/clm/20110650consultantsglines.pdf (e) The National Environment Protection (assessment of contamination) Measures 2013 as amended	Vegetation Clearing works commenced 12/12/18. The following reports and correspondence have been viewed: - "Waste Classification meeting" discussing approach to additional investigations, 12 November 2018 - Virgin Excavated Natural Material Assessment, EIS, 13 November 2018 - Interim Advice #08 for Statutory Site Audit No. 279 by Dr Ian Swane, Review of Staging of RAP for Lindfield Learning Village Project, 8th November 2018 - Interim Advice #11 for Statutory Site Audit No. 279 by Dr Ian Swane, RAP Addendum for Lindfield Learning Village Project, 21st November 2018	The reports and correspondence satisfy compliance in line with this condition.			



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Schedule 2 B15	Prior to commencement of external works or vegetation clearing, an unexploded ordnance (UXO), exploded ordnance (EO) and exploded ordnance waste (EOW) Site Assessment Survey must be undertaken by an UXO contractor listed on the Defence Panel of suitably qualified UXO consultants and contractors and submitted to the Secretary. Note: Incremental vegetation clearing may commence in areas certified as being either free from contamination or remediated (including UXO, EO and EOW) by the accredited site auditor.	A UXO field validation survey dated 29 October 2018 was undertaken by G-tek Australia Pty Limited who is a member of the current Department of Defence Environmental and Heritage Panel.	General compliance with this condition has been demonstrated.			
Schedule 2 B16	The Remediation Action Plan must be updated to: (a) include a cost benefit analysis to compare the different remedial options considered; (b) estimates of likely volumes of contaminated material to be remediated or removed from site under the preferred options; (c) reflect the findings of the additional site investigation required by condition B14; (d) reflect the findings of the UXO, EO and EOW Site Assessment Survey required by condition B15; and (e) include a UXO, EO and EOW Management Plan (if required); The updated Remediation Action Plan must be approved by a NSW EPA Accredited Site Auditor and submitted to the Planning Secretary prior to commencement of works.	A RAP has been produced by EIS. The RAP is dated 16 August 2018. Works identified in site interview as commencing on site 11 November 2018. Addendum to the RAP was prepared by EIS (report ref: E30259KMrpt3_RAP_Addendum, dated 21 November 2018). a: No mention of Cost Benefit Analysis. Section 5.2 of RAP "consideration of Remediation Options". b: No volume estimates c: RAP provides procedure for non-investigated areas. Need to demonstrate how this will be followed / implemented d: No indication that this has been met? e: See point d. Sighted Interim Advice #11 from Accredited Site Auditor, Dr Ian Swane, dated 21 November 2018. DoE email dated 30/11/18 identifies the RAP update under CoC B16 being submitted to DPE on 28/11/18. Item (c) of the condition identifies the procedure for additional site investigations but not the findings. A copy of the findings of the EIS investigations were requested during site audit on 4/1/19. Identified in RFI response (4/1/19) as not being relevant to ACM. No mention of PCB or lead hot spot. A Site Audit Statement dated 25/01/2019 was provided as evidence as part of the audit closing meeting identifying that the SSD project site has been investigated and remediated so that the site is suitable for its intended use without the need for any other conditions.	Updated RAP was not been submitted prior to commencement of works in general, but has been submitted to DPE in advance of works disturbing the site areas addressed by the condition. RAP addendum 21/11/18 addresses items (c) ; (d) and (e) of the condition, but not (a) and (b). Site Audit Statement provides conclusive finding re: remediation.			
Unexpected Contamination Procedure						
Schedule 2 B17	Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with Condition B29 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.	RAP refers to Unexpected Finds in Section 10. Section 3.3.1 of CEMP refers to CLM unexpected finds procedure. Appendix J of CEMP provides Unexpected Finds Protocol	General compliance with this condition has been demonstrated.			
Utilities and Services						
Schedule 2 B18	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Sydney Water approval sighted on Aconex .	General compliance with this condition has been demonstrated.			
Schedule 2 B19	Prior to the commencement of above ground works written advice must be obtained from the electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.	Erbas Engineering Consultants have reviewed the utility documents and certify the adequate provision of services for the Lindfield Learning Village. Document sighted on Aconex.	General compliance with this condition has been demonstrated.			
Schedule 2 B20	Water, electricity, telecommunications and gas services must be provided or upgraded to comply with sections 4.2.7 and 4.1.3 of Planning for Bush Fire Protection 2006.	Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) for all approved conditions requiring certification has been accepted by approved certifier. Document sighted on Aconex	General compliance with this condition has been demonstrated.			
Community Communication Strategy						



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Schedule 2 B21	<p>A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication between the Applicant, the relevant Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction.</p> <p>The Community Communication Strategy must:</p> <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>The Community Communication Strategy must be submitted to the Planning Secretary for approval no later than two weeks before the commencement of any work.</p> <p>Work for the purposes of the development must not commence until the Community Communication Strategy has been approved by the Planning Secretary, or within another timeframe agreed with the Planning Secretary.</p>	<p>Commencement of works on site identified during site interview as 11/11/2018.</p> <p>Aconex references Community Communication Strategy initially issued to DPE for approval on 25/10/18 and subsequent revision responding to DPE comments of 29 October 2018, issued to DoE on 16/11/18.</p> <p>DoE correspondence to DPE dated 30/11/18 identifies issue of CCS to DPE for approval 23/10/18 and revised on 19/11/18.</p> <p>Approval letter from DPE 7/12/2018</p> <p>Copy of the CCS provided at closeout meeting.</p>	<p>DPE has confirmed compliance of submitted documentation in accordance with this requirement in a letter dated 7/12/2018.</p> <p>CCS not approved prior to commencement of work.</p>			
Compliance						
Schedule 2 B22	<p>The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.</p>	<p>Table 2.2 of CEMP refers to EPA Act 1979. "Works must proceed in accordance with the consent provided, including any conditions".</p> <p>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 Taylors' office for reference.</p>	<p>General compliance with this condition has been demonstrated.</p>			
Ecologically Sustainable Development						
Schedule 2 B23	<p>Prior to the commencement of construction, the Applicant must submit details of all design measures to the Certifier demonstrating that the proposed new buildings incorporate ecologically sustainable development initiatives as outlined within the ESD Report prepared by UMOW LAI Consulting Engineers dated 20 March 2017 comparable to an informal 4-star Green Star – Design & As Built tool rating.</p>	<p>Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) for all approved conditions requiring certification has been accepted by approved certifier.</p>	<p>General compliance with this condition has been demonstrated.</p>			
Outdoor Lighting						
Schedule 2 B24	<p>Prior to commencement of construction, the Applicant must submit details of all outdoor lighting within the site to the satisfaction of the Certifier demonstrating compliance with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-1997 Control of the obtrusive effects of outdoor lighting.</p>	<p>Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) for all approved conditions requiring certification has been accepted by approved certifier.</p>	<p>General compliance with this condition has been demonstrated.</p>			
Access for People with Disabilities						
Schedule 2 B25	<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 Certifier must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.</p>	<p>Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) for all approved conditions requiring certification has been accepted by approved certifier.</p>	<p>General compliance with this condition has been demonstrated.</p>			
Biodiversity						



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Schedule 2 B26	The Applicant must: (a) Ensure that no more than 1.74 hectares of native vegetation is affected by the development; and (b) Minimise: i) The impacts of the development on hollow-bearing trees; and ii) The clearing of native vegetation and key habitat within the approved disturbance footprint.	Letter sighted on Aconex stating " <i>Kleinfelder as the project ecologists will ensure with reference to condition B26, that we will follow these conditions as documented on the approved drawings, the Landscape Management Plan and the Flora and Fauna Management Subplan</i> ". A number of at Risk tree reports were sighted for the project: - At Risk Tree – Aboricultural Report Tree 49, Rain Tree Consulting, 19 November 2018 - At Risk Tree – Aboricultural Report Tree 66, 67 & 96, Rain Tree Consulting, 19 November 2018 - At Risk Tree – Aboricultural Report Tree 88, Rain Tree Consulting, 19 November 2018. LMP identifies pre-clearing surveys to avoid accidental incursions. LMP identifies a Monitoring Datasheet (included in Appendix 4 of the LMP - Kleinfelder, 12/11/18) and a daily log completed which would be provided in a letter/report on completion of clearing. Neither a daily log or Appendix 4 Landscape and Fuel Monitoring Datasheet were sighted during the audit. Clearing of vegetation not completed as at 4/1/19.	There is no verification of implementation of the documented process to demonstrate how this is currently being monitored and managed week to week. Risk tree reports identify a potential change to the total number of trees removed, but no indication of where this quantum is tracked or communicated. Similarly, no record of trees that may have come down in storm events across November - January during significant storm events. Final report by Kleinfelder expected to provide quantification against CoC prescription of 1.74 ha, however, proactive change management identifying any additional clearing requirements (ie storm or safety related) and notifications would be of benefit rather than being left to the end of clearing report.			
Schedule 2 B27	Prior to the commencement of vegetation removal, the Applicant must retire biodiversity credits of a number and class specified in Table 1 and provide evidence to the satisfaction of the Planning Secretary. The retirement of credits must be carried out in accordance with the NSW Biodiversity Offsets Policy for Major Projects, and can be achieved by: (a) Acquiring or retiring credits under the Biobanking scheme established under the then Threatened species Conservation Act 1995; (b) making payments into an offset fund that has been established by the NSW Government; or (c) providing suitable supplementary measures. *See Table 1 Ecosystem credit requirements B27 CoC	Vegetation removal identified during site audit as commencing 12/12/18. DoE correspondence to DPE dated 30/11/18 identifies retirement of credits via payment to BCF by NSW DoE Executive Director on 29/11/18.	General compliance with this condition has been demonstrated.			
	Environmental Management Plan Requirements					
Schedule 2 B28	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: (a) detailed baseline data; (b) details of: i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); ii) any relevant limits or performance measures and criteria; and iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; (c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; (d) a program to monitor and report on the: i) impacts and environmental performance of the development; ii) effectiveness of the management measures set out pursuant to paragraph (c) above; (e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; (f) a program to investigate and implement ways to improve the environmental performance of the development over time; (g) a protocol for managing and reporting any: i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); ii) complaint; iii) failure to comply with statutory requirements; and (h) a protocol for periodic review of the plan.	Project management plans reviewed as part of this audit include: B13 Landscape Management Plan (Kleinfelder, 24/8/18 and revised v4 dated 12/11/18) B29 Construction Environmental Management Plan (Zoic Environmental, 29 October 2018). B30 The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) (Commercial TC, 2 October 2018). B31 The Construction Noise and Vibration Management Sub-Plan (CNVMSP) (Acoustic Logic, 5th October 2018). The following documents have been prepared to address requirements of CoC B32 The Construction Waste Management Sub-Plan (CWMSMP): - <i>Dumpit Bins, Waste and Recycling Process & Flow, Not dated</i> - <i>Foresight Environmental - Construction and Demolition Waste Management Plan, 27 March 2017</i> - <i>Pure Contracting- Asbestos Removal Control Plan, 10 August 2018</i> B34 Construction Flora and Fauna Management Sub-Plan (FFMSP) (Kleinfelder, October 2018) B35 Bush Fire and Flood Emergency Response Sub-Plan (BFFERSP) (EWFw Consulting Engineers, 18 October 2018). B42 Conservation Management Plan (CMP) (URBIS, 6 November 2018). Project Environmental Management Plan (PEMP) (Taylors, January 2018).	All project management plans reviewed as part of the audit scope satisfy the general requirements of this condition.			
	Construction Environmental Management Plan					



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Schedule 2 B29	<p>Prior to commencement of construction, the Applicant must prepare a Construction Environmental Management Plan (CEMP) and it must include, but not be limited to, the following:</p> <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) groundwater management plan including measures to prevent groundwater contamination;</p> <p>vii) external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting;</p> <p>viii) community consultation and complaints handling;</p> <p>(b) Construction Traffic and Pedestrian Management Sub-Plan (see Condition B30);</p> <p>(c) Construction Noise and Vibration Management Sub-Plan (see Condition B31);</p> <p>(d) Construction Waste Management Sub-Plan (see Condition B32);</p> <p>(e) Construction Soil and Water Management Sub-Plan (see Condition B33);</p> <p>(f) Construction Flora and Fauna Management Sub-Plan (see Condition B34);</p> <p>(g) Bush Fire and Flood Emergency Response (see Condition B35);</p> <p>(h) Asbestos Management Plan; and</p> <p>(i) unexpected finds protocols for contamination, Aboriginal and non-Aboriginal heritage and associated communications procedure;</p> <p>The Applicant must not commence construction of the development until the CEMP is approved by the Certifier and a copy submitted to the Planning Secretary.</p>	<p>Taylors' CEMP dated 29/10/18, reference 18236.</p> <p>Savills' letter of 31/10/18 to DoE identifies submission of the CEMP to the certifier for their action.</p> <p>BCA Logic Letter dated 31 October 2018 [Ref: Ref: 106808A] in advance of Construction works commencing on 11/11/18.</p> <p>DoE correspondence to DPE dated 30/11/18 identifies submission of CEMP to DPE on 2/11/18.</p> <p>Construction commenced 11/11/18.</p>	<p>The content of the CEMP generally complies with the requirements of sub-conditions of CoC B29(a - i).</p> <p>Compliance with condition has been demonstrated.</p>			
Schedule 2 B30	<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 and RMS;</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>TMP prepared by Commercial TC Pty Limited (ref 1829 V2, dated 2/10/18)</p> <p>a: Condition met</p> <p>b: Section 1.6 "Prior to construction works, this CEMP is to be provided to Ku-ring-gai Council and to the Secretary of Department of Planning and Environment (DP&E) for comment" . Consultation needs to be demonstrated. No mention of RMS.</p> <p>c: SECTION 10. PROPOSED STRATEGY OF TRAFFIC MANAGEMENT - covers measures to be implemented.</p> <p>d Addressed in Section 2 of the report</p> <p>e: Code of Conduct for Drivers not sighted - this is managed day to day via the traffic personnel and oncoming drivers via two-way radio and delivery scheduling and co-ordination by Taylors site supervisor.</p> <p>f: No program to assess implementation</p> <p>g: Section 12 in Report body - Community & Motorists Consultation / Notification</p> <p>Project is required to demonstrate that the plan has been prepared in consultation with Council and RMS. However, correspondence from Commercial (9/10/18) identifies Eton road is not an RMS road and therefore RMS do not need notification. Truck arrival routes include M2, Epping Road, Pacific Highway, Delhi Road and Lady Game Drive which would indicate RMS were to be consulted in TMP preparation.</p> <p>BCA Logic letter dated 1/11/18 affirms certifier's consideration that condition is satisfied.</p>	<p>The content of the CTPMSP generally complies with the requirements of sub-conditions of CoC B30.</p> <p>Noted that section 1.5 Plan Objective includes "to satisfy the key legal requirements related to Traffic, Transport and Access to site" and to "ensure compliance with relevant specification and the RMS's - Traffic Control at Work Sites Handbook Version 4", yet these are not specified further and not recorded in a legal requirements register for the site/development.</p> <p>Plan references "Council's approved DA site hours".</p>			



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Schedule 2 B31	The Construction Noise and Vibration Management Sub-Plan (CNVMSP) must address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced noise expert; (b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); (c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; (d) include strategies that have been developed with the community for managing high noise generating works; and (e) describe the community consultation undertaken to develop the strategies in condition B31(d). (f) include a complaints management system that would be implemented for the duration of the construction.	a: Prepared by Acoustic Logic. b: Report identifies impact on nearby receptors as null, unless civil works within 40m of residential receptors. Section 6 of the NVMP address mitigation measures. c: See point B. d: Section 6.1 suggestions notification to impacted receptors where nearby receptors are to be impacted. e: letter drops to nearby residents has occurred in the past. The project web page provides project updates on upcoming activities. f: Section 6.3 provides compliant procedure. Complaints management is handled by Department of Education. BCA Logic letter dated 1/11/18 affirms certifier's consideration that condition is satisfied.	The content of the CNVMSP generally complies with the requirements of CoC B31. There appear to be four avenues for complaints (Taylor directly, 1800 number, SI Feedback and LLV direct email). This may result in not all complaints being documented and effectively closed out. Taylor's complaints register has a single complaint whereas the SI complaints register online has four.			
Schedule 2 B32	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the following: (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; (b) removal of hazardous materials including asbestos, 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; and (c) include details for air quality monitoring during remedial works.	The CWMSP consist of the following reports: - Dumpit Bins, Waste and Recycling Process & Flow, Not dated - Foresight Environmental - Construction and Demolition Waste Management Plan, 27 March 2017 - Pure Contracting- Asbestos Removal Control Plan, 10 August 2018 Specific wastes with particular disposal requirements (ie PCB (as per PCB CCO) and Ardex drums (as per SDS)) should be documented. BCA Logic letter dated 1/11/18 affirms certifier's consideration that condition is satisfied.	The content of the CWMSP generally complies with the requirements of CoC B31.			
Schedule 2 B33	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) be submitted to the approval of the Certifying Authority prior to the commencement of construction; (c) describe all erosion and sediment controls to be implemented during construction; (d) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (e) detail all off-Site flows from the Site; (f) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI); (g) be prepared in accordance with the document Managing Urban Stormwater-Soils & Construction Volume 1 (2004) by Landcom.	CEMP Section 3.2.1 provides an overview of typical ESC control measures. Figures 4 - 11, Appendix A of CEMP provides overview of where controls are to be installed. The Project Environmental Management Plan (PEMP) produced by Taylors addresses soil and water management in section 13.2.3. CEMP states: <i>The controls should be inspected and approved by the Site HSE Officer prior to the commencement of works. The controls shall be maintained in good working order and inspected to ensure they are effective in controlling erosion and sedimentation. Accumulated sediment shall be removed and disposed of regularly, i.e. weekly and after rain events.....</i> EWWF Consulting Engineers provided a Certificate of Design Erosion and Sediment Control Plans reference Nos.C-011 through C-017 revision A all dated 10/10/18. Certification excludes B33(d) - identifying it as captured within the CSWMP - which content is actually in the CEMP and PEMP. Certifies design is compliant with and consistent with the DA approved stormwater drainage plans, conditions of consent and AS 3500.3 BCA Logic letter dated 1/11/18 affirms certifier's consideration that condition is satisfied by reference to Certificate of Design dated 24/10/18. Provided EWWF Plans C-011-A; C-012-A; C-013-A; C-014-A; C-015-A; C-016-A; and C-017-A (all dated 12/10/18) are labelled as being "Preliminary - not for Construction".	General compliance with this condition has been demonstrated via the CEMP and PEMP and associated ErSed plans, Document control and cross-referencing should be consistent and reflect final site design plans rather than "Preliminary" or "Preliminary Not for Construction". CEMP identifies inspection and maintenance of controls weekly and after rain event. Site inspection identified maintenance of controls required additional attention.			



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Schedule 2 B34	The Applicant must prepare a Construction Flora and Fauna Management Sub-Plan (FFMSP) in consultation with OEH. The plan must address, but not be limited to, the following: (a) measures to minimise the loss of key fauna habitat, including tree hollows; (b) measures to minimise the impacts on fauna on site, including conducting fauna pre-clearance surveys prior to vegetation clearing, building/structure demolition; (c) engagement of an appropriately qualified ecologist with experience in capturing native wildlife to be on site for all vegetation removal activities; (d) controlling weeds and feral pests; (e) an Unexpected Finds Procedure detailing procedures and management measures to be implemented in the event that flora and fauna is uncovered in any area not identified in the updated Biodiversity Assessment (BAR); (f) measures to ensure biodiversity values not intended to be impacted are protected, including barriers and mapping of protected/ 'no-go' areas; and (g) a program to monitor the effectiveness of the measures in the FFMSP.	The updated FFMSP for the project (Version 1.6 Kleinfelder, December 2018) was sighted and has been developed in general compliance with the all sub-condition of CoC B34. BCA Logic letter dated 1/11/18 affirms certifier's consideration that condition is satisfied for version 1.5 dated 28/11/18. Version 1.6 incorporated comments from DPE and was completed 18/12/18. DoE correspondence of 30/11/18 identifies submission to DPE on 26/10/18, 15/11/18 (response to DPE), and 29/11/18 (Response to OEH as identified in DPE letter dated 7/12/18). 18/12/18 version 1.6 identified as incorporating DPE comments. Not required for submission to DPE for approval. Kleinfelder toolbox talk/SWMS/pre-starts reviewed to demonstrate implementation on site of FFMSP control measures. Verification documentation requested at 4/1/19 site audit.	The content of the FFMSP generally complies with the requirements of CoC B34.			
Schedule 2 B35	The Bush Fire and Flood Emergency Response Sub-Plan (BFFERSP) must be prepared in consultation with the RFS and NSW SES and Council and address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced person(s); (b) address the Planning for Bushfire Protection 2006; (c) address the provisions of the Floodplain Risk Management Guideline (OEH, 2007); (d) include details of: i) the bush fire and flood emergency responses for the construction phase 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.	The BFFERSP for the project was sighted and have been developed in general compliance with the all sub-condition of CoC B35. An on-site Bushfire Evacuation Plan A3, Taylors, and Site Evacuation Plan A3, Taylors, were sighted during the audit (4/1/19). BCA Logic letter dated 1/11/18 affirms certifier's consideration that condition is satisfied by reference to Blackash Bushfire Emergency Response Sub-Plan (Version 1.0 dated 11/10/18) and EWWF Flood Emergency Management Plan reference no. 21151-001, dated 18/10/18) and Bushfire and Flood Evacuation Routes plan (taylors - as referenced above). Savills' letter to DoE dated 19/10/18 identifies documentation to be forwarded to RFS and NSW SES for approvals. Additionally plans are identified as being issued to PCA and Council for approval, rather than for consultation as per the condition. RFS consultation table sighted, identifying no comment made in respect of the evacuation plan as at 12/11/18. Council consultation initiated by Schools Infrastructure NSW (SINSW) on 27/9/18 identified in Council Correspondence tracker identifying walkover of area on-site and evacuation footpath route. No indication of consultation with NSW SES. Section 7 of the FEMSP may have the discussion on floor levels and flood levels (AHD) around the wrong way.	Consultation with SES which has been evidenced in consultation table (excel) provided during the audit closing meeting. Consultation with SES initiated with SES 11/12/2018. The BFFERSP should be updated to reflect project Bushfire Evacuation and Site Evacuation Plans observed on-site and to ensure consistency of assembly points. Given the proximity to the Lane Cove River causeway (at Delhi Road) and the susceptibility of Grosvenor Road, Lady Game Drive and Delhi Road in this vicinity to flooding, it would be beneficial for the Emergency and evacuation plan to have consideration of the effects of these road closures on triggering evacuation response rather than being limited to localised/site flooding. This is applicable in response to nominated travel routes in the Construction Traffic Management Plan and in consideration of access/egress to site for parents/pupils and public transport during operation of the site. The project generally complies with the requirements of CoC B35.			
Construction Parking						
Schedule 2 B36	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 on-street parking or public parking facilities.	A site layout plan has been viewed via Aconex (reference Taylors Site Hoardings/Access Plan, identified as Taylor Site Establishment Plan 20/7/2018, dated 20/7/18). The plan indicates that parking is within the site and is of sufficient capacity to meet the project demands. Heavy vehicles were observed to be contained within site boundaries and no on-road queuing or idling was observed. Adjacent vacant land has been leased to provide additional car parking for site staff and contractors.	General compliance with this condition has been demonstrated.			
Infrastructure Upgrades						



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
				Compliant	Non-compliant	Not Triggered
Schedule 2 B37	<p>Prior to the commencement of construction, the Applicant must submit for approval by Council’s Director of Operations on behalf of Council as a road authority, full design engineering plans and specifications prepared by a suitably qualified and experienced civil engineer for the following infrastructure works:</p> <p>(a) upgrade of pedestrian facilities/connections between the Eton Road Bus Bay and the front/main entrance of the school including:</p> <p>i) A reconfigured intersection, approximately 30m south of the Eton Road intersection with Dunstan Grove, to ensure the pedestrian crossing is consistent with Austroads requirements for pedestrian crossing lengths, vehicle and bicycle movements;</p> <p>ii) The pedestrian crossing must be a raised crossing to moderate vehicle speeds and highlight pedestrian priority at this intersection; and</p> <p>iii) 2.5m minimum width footpaths.</p> <p>(b) construction of new footpaths/footpath upgrades and associated pedestrian crossings at no cost to Council between the site and Lindfield Public School including:</p> <p>i) Full survey details for the full distance of travel on the footpath from the subject property all the way to Lindfield railway station. Details to include a longitudinal section and cross-sections every 5m, showing compliance with Council’s gradient requirements; and</p> <p>ii) An Arborist assessment in relation to the impact on trees from the construction of the footpath/upgrades to existing footpaths.</p> <p>(c) construction of a prioritised raised pedestrian crossing on Grosvenor Road between Austral Road and Bent Street</p>	<p>Commencement of construction identified on site as 29/10/18. Works subject to the Council approvals specified, identified as not having been commenced prior to receipt of approval.</p> <p>Council Conditions of approval for Footpaths (October 2018) and External Works (November 2018) sighted.</p> <p>Arup certification for Conditions B37, B38, B39, B51 and B52 dated 22/10/18 sighted - reference 251272 (noting reference to Draft CoC 52 and 53).</p>	<p>General compliance with this condition has been demonstrated.</p>			
Schedule 2 B37 (cont.)	<p>The required plans and specifications are to be designed in accordance with the General Specification for the Construction of Road and Drainage Works in Ku-ring-gai Council, dated November 2014. The drawings must detail existing utility services (mains and house connections) and trees affected by the works. Construction of the works must proceed only in accordance with any conditions attached to the Roads Act approval issued by Council. A minimum of three (3) weeks will be required for Council to assess the Roads Act submissions. Early submission is recommended to avoid delays in commencing construction. For the purpose of inspections carried out by Council Engineers, the corresponding fees set out in Council’s current Fees and Charges Schedule are payable to Council prior to issue of the approved plans. An engineering plan assessment fee is also applicable.</p> <p>Approval must be obtained from Ku-ring-gai Council as the road authority under Section 139 Roads Act 1993 for any proposed works in the public road prior to the commencement of construction.</p> <p>Evidence of approval must be submitted to the Planning Secretary within 8 weeks of commencement of construction.</p>					
Parking Restrictions						
Schedule 2 B38	<p>Prior to the commencement of construction, the Applicant must consult with TfNSW to determine whether additional ‘No Parking’ signs are required to ensure two buses are able to pass each other on all bus routes in the vicinity of the school.</p>	<p>Correspondence from Arup dated 22 October 2018 sighted on Aconex certifying compliance with condition CoC B38.</p> <p>Consultation identified as having commenced with TfNSW in Savills’ letter to DoE dated 23/10/18.</p>	<p>General compliance with this condition has been demonstrated.</p>			
Schedule 2 B39	<p>Prior to the commencement of construction, the Applicant must submit to Council, for approval from Council’s Traffic Committee, documentation for the installation of ‘No Parking’ restrictions on the southern side of Eton Road between (approximately) 76 Eton Road at the curve west of Austral Avenue. The ‘No Parking’ restrictions are to apply on a part-time basis (7:00am - 9.30am, 2.30pm - 4.30pm, School Days only).</p> <p>Additional ‘No Parking’ signs may also be required to ensure two buses are able to pass each other on all bus routes in the vicinity of the school.</p> <p>Note that as part of the Traffic Committee process, Council will consult with directly affected residents on the proposal to install the restrictions. Fees associated with reporting to the Ku-ring-gai Traffic Committee must be paid by the Applicant prior to processing the application. The installation of the signs must be at no cost to Council.</p> <p>Evidence of approval must be submitted to the Planning Secretary within 8 weeks of commencement of construction, unless otherwise agreed by the Planning Secretary.</p>	<p>Correspondence from Arup dated 22 October 2018 sighted on Aconex certifying compliance with condition CoC B39.</p> <p>Council Conditions of approval for Footpaths (October 2018) and External Works (November 2018) sighted.</p> <p>DoE issue of approvals to DPE identified in DoE correspondence of 30/11/18 identifying transmittal on 9/11/18 (within 8 weeks of commencement of construction).</p>	<p>General compliance with this condition has been demonstrated.</p>			
Design of Mechanical Plant and Equipment						
Schedule 2 B40	<p>Prior to commencement of construction, plant and equipment must be selected and designed to achieve the relevant intrusiveness criteria set out in Table 2 of the letter titled ‘Lindfield Learning Village – Response to EPA Queries’ prepared by Acoustic Logic, dated 13 August 2018. The Certifier must verify that all reasonable and feasible noise mitigation measures have been incorporated into the design to ensure the development will not exceed the recommended operational noise levels identified.</p>	<p>Certified by Erbas 22/10/2018 - Aconex.</p> <p>Letter from BCA (1 November 2018) for all approved conditions requiring certification has been accepted by approved certifier.</p>	<p>General compliance with this condition has been demonstrated.</p> <p>Note for records management and QA/QC - the certification letter is dated 22/10/18 and the signature is dated 3/10/18.</p>			

Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
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Schedule 2 B41	The school PA system and bells must be designed in accordance with the design criteria outlined in the letter titled 'Lindfield Learning Village – Response to EPA Queries' prepared by Acoustic Logic, dated 13 August 2018 and installed to facilitate adjustment in response to any complaints of offence noise that may be received during its operation.	Certified by Erbas 26/10/2018 - Aconex. Letter from BCA (1 November 2018) for all approved conditions requiring certification has been accepted by approved certifier.	General compliance with this condition has been demonstrated.			
	Historic Heritage					
Schedule 2 B42	Prior to the commencement of construction, a Conservation Management Plan (CMP) must be prepared in accordance with the relevant guidelines of the NSW Heritage Council, in consultation with the Heritage Division and submitted to the satisfaction of the Planning Secretary. The CMP must be prepared by an appropriately qualified and experienced heritage consultant(s) and have appropriate skills and experience in both built form and landscape heritage with documented experience in the preparation and implementation of CMPs. The CMP must include, but not be limited to: (a) A summary of already documented heritage values of the site; (b) The development of heritage design principles for the project to retain the heritage significance of the site; (c) Specific mitigation measures for the site to minimise impact and to ensure the final measures selected are appropriate and the least intrusive option; and (d) Changes to the detailed design to mitigate heritage impacts.	The project CMP produced by URBIS and dated 6 November 2018 has been reviewed. <i>Aconnex Letter B42: It is noted that the condition requires the CMP be prepared "in consultation with the Heritage Division."</i> <i>During the preparation of the CMP, Urbis Heritage made contact with the Heritage Division and were unable to consult on the development of the CMP for the Lindfield Learning Village.</i> a: Comprehensive CMP that addresses heritage values of the site. b: Sections 8 and 9 of this CMP provide an overview of heritage opportunities and constraints specific to the property, as well as conservation policies and guidelines to assist in the management of the site's heritage values. Section 8.8.2 'Design Development and Response to Constraints'. c: Section 9 provided Conservation policy overview for the site. d: Section 9.5 refers to managing change. DoE correspondence of 30/11/18 identifies transmittal of the CMP to the DPE on 19/11/18. Heritage Consultation Table prepared by Savills identifies consultation attempts with OEH and confirmation from Fiona Binns in letter to DPE (16/11/18) that OEH not able to consult and the CMP was prepared in accordance with B45 (referencing draft condition reference), and relevant guidelines.	The content of the CMP generally complies with the requirements of CoC B42.			
Schedule 2 B43	Prior to the commencement of construction, a Heritage Implementation Strategy (HIS) including a detailed Schedule of Conservation Works prepared by a suitably qualified heritage consultant must be prepared. A copy must be submitted to the Heritage Division, Council and the Planning Secretary and include but not be limited to: (a) Retaining the extant timber ceiling of the existing library area. This must include a methodology for the removal and salvage of ceiling and its reinstatement after the installation of services and include measures to minimise impacts as a result of the installation of services; (b) Significant fabric affected by the internal firewall (including parquet floor within the cafeteria) must be salvaged and stored for reinstatement (c) Retaining the spiral stairs towards the southern boundary of the building (for possible future reuse) and installing lockable gates to prevent access as they are not BCA compliant; (d) Retaining all built in bench seating in the communal areas (inside and outside); (e) Alteration or adaptation of the spaces that are accessed directly from the main circulation spine should utilise the existing patterns of black anodised glazing; (f) Retaining, replacing like-for-like or reinterpreting the green carpet in the main entry and main circulation space(s), and identify any other areas for new floor finishes (epoxy, bright coloured carpet); (g) Retaining all original spherical light fittings in communal/public areas where possible, and any fittings that cannot be retained/upgraded in situ be salvaged for reuse within the building; (h) Retaining planter boxes on roof terraces; (i) Include a methodology for maintenance and cleaning activities (eg concrete cleaning); and (j) Include detailed design of any coloured panels to be affixed to external surfaces, play equipment and shade structures.	Commencement of construction works commenced 29 October 2018. A HIS produced by Urbis and dated 14 November 2018 has been sighted. The Schedule of Conservation Works was provided by Apex Diagnostics 24 Oct 2018. a: Addressed in Section 2.1.2 of the HIS b: 2.1.3 c: 2.1.4 d: 2.1.5 e: 2.1.6 f: 2.1.7 g: 2.1.8 h: 2.1.9 i: 2.1.10 j: 2.1.11 DoE correspondence of 30/11/18 identifies transmittal of the HIS and Schedule of Conservation Works to the DPE on 15/11/18.	The content of the HIS generally complies with the requirements of CoC B43.			
Schedule 2 B44	Prior the commencement of any internal works to the existing building, the Applicant must prepare detailed plans in consultation with an appropriately qualified heritage specialist demonstrating the approved fire separation wall can be reversible with no permanent impact on the fabric of the building. Details endorsed by the heritage consultant must be submitted to the Planning Secretary.	This is addressed within Section 2.2 of the HIS. DoE correspondence of 30/11/18 identifies transmittal of the HIS and Schedule of Conservation Works to the DPE on 15/11/18.	The content of the HIS generally complies with the requirements of CoC B44.			
Schedule 2 B45	New works likely to have an impact on any significant heritage fabric of the existing building (not including the landscape setting) must be designed to be reversible in the future.	This is addressed within Section 2.3 of the HIS	The content of the HIS generally complies with the requirements of CoC B45.			



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Schedule 2 B46	Prior to the commencement of any external works to the existing building: (a) the Applicant must prepare detailed elevation and window plans in consultation with an appropriately qualified heritage specialist demonstrating how fire protection measures will be installed to ensure heritage impacts will be minimised to the greatest extent practicable; and (b) the design of any coloured panels to external facades, play equipment and shade structures must be endorsed by a suitably qualified heritage consultant. Plans endorsed by the heritage consultant must be submitted to the Planning Secretary	This is addressed within Section 2.4 of the HIS. DoE correspondence of 30/11/18 identifies transmittal of the HIS and Schedule of Conservation Works to the DPE on 15/11/18.	The content of the HIS generally complies with the requirements of CoC B46.			
Schedule 2 B47	Prior to the commencement of construction, photographic archival recording must be undertaken for the existing building and landscape structures/features in accordance with the Heritage Division Publications How to prepare archival records of heritage items and Photographic Recording of Heritage Items using Film or Digital Capture. A digital and hardcopy must be provided to the Heritage Division, Council and the Planning Secretary.	Construction identified to have commenced on site on 29/10/18. Archival Recording has been undertaken by Alex Mayes Photography (not sighted during audit) and provided to DPE on 26 October and 9 November 2018 (Aconex) DoE correspondence of 30/11/18 identifies transmittal oto the DPE on 26/10/18.	General compliance with this condition has been demonstrated.			
Construction and Demolition Waste Management						
Schedule 2 B48	The Applicant must notify the RMS Traffic Management Centre of the truck route(s) to be followed by trucks transporting waste material from the site, prior to the commencement of the removal of any waste material from the site.	Truck routes have been provided as part of the CTPMSP (page 11 of plan dated 02 October 2018). RMS notified via email correspondence. Contact was made with RMS on 16 October 2018 via Perfect Contracting. Communication with both RMS Special Permits Unit (SPU) and RMS Transport Management Centre (TMC).	General compliance with this condition has been demonstrated			
Mechanical Ventilation						
Schedule 2 B49	All mechanical ventilation systems must be designed in accordance with Part F4.5 of the BCA and must comply with the AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and AS/NZS 3666.1:2011 Air handling and water systems of buildings– Microbial control to ensure adequate levels of health and amenity to the occupants of the building and to ensure environment protection. Details must be submitted to the satisfaction of the Certifier prior to the commencement of construction.	Certified by Erbas 26/10/2018 -sighted on Aconex. Letters from BCA (31 October 2018, 1 November 2018 and 10 December 2018) for all approved conditions requiring certification has been accepted by approved certifier.	General compliance with this condition has been demonstrated.			
Rainwater Harvesting						
Schedule 2 B50	Prior to the commencement of construction, the Applicant must ensure that a rainwater reuse/harvesting system for the development is developed for the site. A rainwater re-use plan must be prepared and certified by an experienced hydraulic engineer.	Aconex references A50. Letter from Erbas states: a Colorbond steel rainwater tank with a capacity of approximately 1000 liters will be installed on level four (4) to the Northern side of the building designated as Zone A, documented on hydraulic drawing SYD18152-LI-H-A105.	General compliance with this condition has been demonstrated.			
Roadworks and Access						
Schedule 2 B51	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 longest vehicle entering the site.	Email correspondence Savills to Ku-ring-gai Council (Jim Turner) 23/10/18. Comments requested by 26/10/18. ARUP Certification dated 30 October identifying design meets the condition. Noted that the condition itself does not specify "prior to commencement of construction", however, the condition sits under Schedule 2 Part B "Prior to Commencement of Construction". Council Permit: Council Permit to Opening a Public Place Roads Act 1993 Section 101 and 102 Application No.: ROP 18/0272 Licence No: 113546C Date: 19 November 2018 Drawing # TCI-6200 & TCI-6201, issue B, prepared by Birzulis Consulting Structural & Civil Engineers, dated 15/10/2018 and displaying council stamp (5 November 2018).	General compliance with this condition has been demonstrated.			
Car Parking and Service Vehicle Layout						



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Schedule 2 B52	Plans demonstrating compliance with the following requirements must be submitted to the satisfaction of the Certifying Authority prior to the commencement of building works: (a) minimum of 65 on-site car parking spaces for use during operation of the development and constructed in accordance with the latest version of AS2890.1; (b) all operational vehicles accessing the Site, including the loading dock, are to be limited to Medium Rigid Vehicles or smaller only, unless otherwise agreed by Secretary; (c) all demolition and construction vehicles (excluding worker vehicles) are to be contained wholly within the Site and vehicles must enter the Site before stopping; (d) appropriate pedestrian advisory signs are to be provided at the egress point of the car park; (e) all works/ regulatory signposting associated with the proposed development must be at no cost to the relevant roads authority; (f) the swept path of the longest vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the Site, must be in accordance with AUSTROADS. In this regard, a plan must be submitted to Council for approval, which shows that the proposed development complies with this requirement; and (g) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed.	Letter from BCA (1 November 2018) certifying satisfaction of condition sighted for CoC B52. Council Permit: Council Permit to Opening a Public Place Roads Act 1993 Section 101 and 102 Application No.: ROP 18/0272 Licence No: 113546C Date: 19 November 2018 Drawing # TCI-6200 & TCI-6201, issue B, prepared by Birzulis Consulting Structural & Civil Engineers, dated 15/10/2018 and displaying council stamp (5 November 2018).	General compliance with this condition has been demonstrated.			
	Bicycle Parking and End-of-Trip Facilities					
Schedule 2 B53	Plans demonstrating compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the satisfaction of the Certifier: (a) the provision of a minimum 42 bicycle parking spaces; (b) the layout, design and security of bicycle facilities must comply with the minimum requirements of AS 2890.3:2015 Parking facilities - Bicycle parking, (including provision for both wheels and the frame to be locked to the bicycle rack) and be located in easy to access, well-lit areas that incorporate passive surveillance; (c) the provision of end-of-trip facilities for staff in accordance with the ESD Design & As Built rating tool; (d) appropriate pedestrian and cyclist advisory signs are to be provided; and (e) all works/regulatory signposting associated with the proposed developments must be at no cost to the relevant roads authority.	Letter from BCA (10 December 2018) certifying satisfaction of condition sighted for CoC B53. Certification references DesignInc design certificate (24/10/18).	General compliance with this condition has been demonstrated.			
	Public Domain Works					
Schedule 2 B54	Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifier that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from Council to the Certifier.	Letter from BCA (10 December 2018) certifying satisfaction of condition sighted for CoC B53. Certification references Birzulis Consuting Structural and Civil Engineers, dated 15/10/18) displaying Ku-ring-gai Council Approval stamp. Ku-ring-gai Council Conditions of Approval of Works sighted, dated November 2018)	General compliance with this condition has been demonstrated.			
	Compliance Reporting					



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Schedule 2 B55	<p>No later than two weeks before the date notified for the commencement of construction, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifier.</p> <p>Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).</p> <p>The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the Certifier in writing at least seven days before this is done.</p>	<p>A Compliance Monitoring and Reporting Program (CMRP) has been developed for the project (Aspect Environmental Pty Limited, Reference 0011021018, Rev 2 dated 26/10/18).</p> <p>Letter from BCA (1 November and 10 November 2018) certifying satisfaction of condition sighted for CoC B55.</p> <p>Correspondence from DoE to DPE dated 30/11/18 identifies issue of the CMRP to the DPE on 26/10/18 (reflecting updated conditions of consent to SSD 8114), and 28/11/18 (responding to DPE). The same correspondence identifies issue of the BCA Logic Certifier's letter of compliance to the DPE on 1/11/18.</p> <p>No compliance reports addressing the entirety of the prepared CMRP content have been identified as being completed for the project.</p> <p>A pre-construction compliance report would have ordinarily been expected to be undertaken for pre-construction activities prior to commencement of construction. The CMRP was issued to DPE on 26/10/18, BCA Logic prepared a certification assesment of address of conditions requiring certification on 1/11/18 (which was issued to the DPE) and construction commenced on 4/11/18.</p> <p>The timing constraints for the project have placed reliance for consideration of compliance for pre-construction demonstrated upon BCA Logic certifying satisfactory address of conditions and review of residual items being picked up in the independent audit to avoid duplication of effort.</p>	<p>General compliance with this condition has been demonstrated, however, the CMRP was not submitted to DPE at least two weeks in advance of construction commencing.</p> <p>The Compliance Reporting Post-Approval Requirements (DPE 2018) identify compliance reports where a particular phase is required to be notified to the Department and includes submission of a pre-construction compliance report where a construcion phase is required to be notified. The timing requirement for a pre-construction compliance report is identified as being required to be submitted to the Planning Secretary prior to commencement of construction.</p> <p>The BCA Logic letter of certification represents a compliance review and report for the pre-construction phase, however, is not in the form of the submitted CMRP document.</p> <p>Compliance with this condition has not been fully demonstrated.</p>			
Independent Environmental Audit						
Schedule 2 B56	<p>No later than two weeks before the date notified for the commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifier.</p>	<p>An Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) has been prepared (Aspect Environmental Pty Limited, Reference 0011011018, Rev 2, dated 25/10/18).</p> <p>Letter from BCA (1 November and 10 November 2018) certifying satisfaction of condition sighted for CoC B56.</p> <p>Savills letter dated 6 November noting Independant Audit Program submitted to DPE on 1 November. Note commencement of construction 11 November.</p> <p>Email dated 6/11/18 from Savills nominating Independent auditor to compliance@planning.nsw.gov.au sighted.</p>	<p>General compliance with this condition has been demonstrated. However, the Independent Audit Program was not submitted to DPE at least two weeks in advance of construction commencing.</p> <p>Compliance with this conditon has not been demonstrated.</p>			
Schedule 2 B57	<p>Independent Audits of the development must be carried out in accordance with:</p> <p>(a) the Independent Audit Program submitted to the Department and the Certifier under condition B56 of this consent; and</p> <p>(b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).</p>	<p>Addressed within the preparation of this current independent audit scope.</p> <p>The IAPAR identifies a requirement to submit the initial independent audit final Audit Report within 16 weeks of the commencement of construction, making the final Audit Report due on 25/2/19. Construction is due to be completed by 31/1/19.</p> <p>The Independent Audit Program and auditor nomination were provided to the DPE on 6/11/18. On 20/12/18 DPE requested the auditor's CV and a letter confirming independence from the Project. This content was originally provided in Section 6 of the Independent Audit Program submitted to the Department on 26/10/18. Replicate confirmation was provided by Aspect and to the Department on 21/12/18.</p> <p>The Site Audit commenced on 11/12/18.</p> <p>Section 3.1.3 of the IAPAR identifies that Independent Audits must not commence until the proposed auditor has been agreed to in writing by the Planning Secretary.</p> <p>No written agreement to the proposed auditor has been provided by the Plannning Secretary.</p>	<p>General compliance with this condition is demonstrated by this audit itself, however, the independent audit was commenced in advance of receipt of written agreement to the nominated auditor being received from the Planning Secretary.</p> <p>DPE received confirmation of both auditor competence and independence from the project as of 26/10/18. Follow up by DPE did not commence until 20/12/18 by request of auditor CV and letter of independence and further request for information on 9/1/18.</p> <p>Compliance with this condition has not been fully demonstrated.</p>			



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Schedule 2 B58	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 B57(b) of this consent; (b) submit the response to the Department and the Certifier; and (c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Department and notify the Department and the Certifier in writing when this has been 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.			
During Construction						
Interpretation Strategy						
Schedule 2 C1	Within four weeks of commencement of construction, an Interpretation Strategy for the building must be prepared to guide how information on the history and significance of the building will be provided for the students and the general public. The strategy should identify the types and locations of interpretive media that will be installed as part of this project.	Interpretation strategy not initially sighted. New handrails - colour matched for current standard compliant handrails were identified and observed. Some of the change room benches in zone A were identified to be re-used. Matched replaced windows design to be fire rating appropriate.	Construction commenced on 11/11/18. Interpretation Strategy by URBIS dated 28/11/2018			
School Bus Plan						
Schedule 2 C2	Within eight weeks of commencement of construction, a School Bus Plan must be prepared in consultation with TfNSW and a copy submitted to the Planning Secretary. The plan must have regard to existing physical constraints, integration with existing services, funding, availability of buses and expected demand for any services by school students	Construction commencement date is 11/11/18. A School Bus plan prepared and certified by ARUP dated 30/11/18 was sighted. Consultation with TfNSW and Transdev dated 4/12/18 identified consultation process for the School Bus Plan commencing 31/5/18 and continuing with meetings on 31/10/18 and correspondence 12/11/18 and 4/12/18.	General compliance with this condition has been demonstrated.			
Approved Plans to be On-site						
Schedule 2 C3	A copy of the approved and certified plans, specifications and documents incorporating conditions of approval and certification must be kept on the Site at all times and must be readily available for perusal by any officer of the Department, Council or the Certifier.	Copies of the approved and certified plans, specifications and documents incorporating conditions of approval and certification can be accessed via Aconex on site. Hard copies of plans were also identified on site (eg CEMP and site plans) during site audit inspections.	General compliance with this condition has been demonstrated.			
Site Notice						
Schedule 2 C4	A site notice(s): (a) must be prominently displayed at the boundaries of the site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifier and Structural Engineer. (b) is to satisfy all but not be limited to, the following requirements: i) minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size; ii) the notice is to be durable and weatherproof and is to be displayed throughout the works period; iii) the approved hours of work, the name of the site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and iv) the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the site is not permitted.	Project site notices were observed at the project site boundaries during each of the site visits.	General compliance with this condition has been demonstrated.			
Operation of Plant and Equipment						
Schedule 2 C5	All plant and equipment used on site, or to monitor the performance of the development must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	All plant and equipment are subject to pre-mobilisation checks prior to arrival on project sites. Taylors' plant and equipment certification stickers were also 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 #29 during site audit inspection.	General compliance with this condition has been demonstrated.			
Demolition						
Schedule 2 C6	Demolition work must comply with Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier before the commencement	All demolition work has been undertaken by Perfect Contracting. Work plans and written statement of compliance not sighted. Certifier verification of work plans and statement of compliance not sighted.	Not triggered as demolition works were identified as being included in an early works package approved as an REF and outside the scope of the SSD CoC			
Construction Hours						



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
				Compliant	Non-compliant	Not Triggered
Schedule 2 C7	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7:00 am and 6:00 pm, Mondays to Fridays inclusive; and (b) between 8:00 am and 3:30 pm, Saturdays. No work may be carried out on Sundays or public holidays.	Access to the project site outside the approved time of 07:00am (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 re: works outside of hours have been identified.	General compliance with this condition has been demonstrated.			
Schedule 2 C8	Activities may be undertaken outside of the hours in Condition C7 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 Secretary or her nominee if appropriate justification is provided for the works. Notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	From site interview, Out of Hours works has not been undertaken on the project to date. No complaints re: works outside of hours have been identified.	General compliance with this condition has been demonstrated.			
Schedule 2 C9	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.	A record of rock breaking activities was not provided. There have been no reported incidents / complaints pertaining to excessive noise or rock breaking activities on the project to date.	General compliance with this condition has been demonstrated.			
Implementation of Management Plans						
Schedule 2 C10	The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	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, albeit maintenance of some control measures (specifically sediment fencing and filters around drains) could be improved.	General compliance with this condition has been demonstrated.			
Construction Traffic						
Schedule 2 C11	All construction vehicles (excluding worker vehicles) are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site before stopping.	All construction vehicles were observed contained within the project site boundary for the duration of the site audit.	General compliance with this condition has been demonstrated.			
Road Occupancy Licence						
Schedule 2 C12	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	No indication of the need for a Road Occupancy Licence was identified during the audit. Section 10. of the Construction Traffic Management Plan states that "The proposed works will not require any road or lane closures". Section 13 of the Construction Traffic Management Plan states that "A Road Occupancy Licence will not be required for this job as vehicles enter/exiting on Wonga Road which is not an RMS road".	Not triggered.			
Safework Requirements						
Schedule 2 C13	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						
Schedule 2 C14	The following hoarding requirements must be complied with: (a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; (b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application; and (c) the Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.	No third party advertising or graffiti were observed on project site hoarding. No hoardings installed over Council footways or road reserves.	General compliance with this condition has been demonstrated.			
No Obstruction of Public Way						



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
				Compliant	Non-compliant	Not Triggered
Schedule 2 C15	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under and circumstances. Non-compliance with this requirement will result in the issue of a notice by the relevant Authority to stop all works on site.	All public ways in proximity of the project site were observed to be free of obstructions.	General compliance with this condition has been demonstrated.			
Construction Noise Limits						
Schedule 2 C16	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.	Daily acoustic monitoring is undertaken and reported by Marshall Day. Construction Noise Monitoring Reports for 06-13 December were sighted. Noise exceedance for this period were not reported. No complaints have been identified as being recieved from local residents for any perceived excessive noise generating activities from the project to date.	General compliance with this condition has been demonstrated.			
Schedule 2 C17	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 C7.	The project site security sign-in sheet indicates that the site has been accessed before 07:00am on 13 December 2018 and 4 January 2018. This indicates personnel access as opposed to construction vehicles. Construction vehicle access was identified as being scheduled by Taylors' site supervisory staff. Running sheet observed for 05 December 2018. No complaints have been identified as being received from local residents for any perceived excessive noise generating activities outside of the approved construction hours.	General compliance with this condition has been demonstrated.			
Schedule 2 C18	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of audible movement alarms of a type that would minimise noise impacts on surrounding noise sensitive receivers.	No complaints have been identified as being received from local residents for any perceived excessive noise generating activities from the project to date. Various alarm types were observed during the site audit, including the normal beeping alarms rather than squawkers.	General compliance with this condition has been demonstrated.			
Schedule 2 C19	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.	Upon review of the Marshall Day noise reports (6 - 13 December 2018) "Highly Noise Affected" levels LAeq >75dB(A), were noted to have ocured on the following days: Saturday 08 December at Logger 2, 6:30am - 7am Wednesday 12 December at Logger 1, 8am - 10am and 12pm - 3pm. Thursday 13 December at Logger 1, 8am - 3pm Thursday 13 December at Logger 4, 11am - 3pm In additon to this, elevatated noise levels were recorded on the project site before approvided construction start times on the following days: Friday 07 December (Logger 3) before 8am Saturday 08 December (Logger 2) before 7am Saturday 08 December (Logger 3) before 7am Sunday 09 December (Logger 3) for a period between 6am and 7am (NB no construction authorised on Sundays) Monday 10 December (Logger 4) before 7am Thursday 13 December Logger 4 recording was disturbed just after 6am and resumed shortly before 9am. No complaints have been identified as being received from local residents for any perceived excessive noise generating activities from the project to date.	General compliance with this condition has been demonstrated. Analysis of noise results would be beneficial to enable a timely and informed response to any complaints received to identify likely noise sources (on or off site). There is nothing accompanying the provided data to confirm nois esources against recorded results.			
Vibration Criteria						
Schedule 2 C20	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, the latest version of 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. No monitoring results for vibratory equipment have been observed.	General compliance with this condition has been demonstrated.			
Schedule 2 C21	Vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C20.	Taylors have confirmed that vibratory compactor activity within 30 metres from residential buildings has not 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.	General compliance with this condition has been demonstrated.			
Schedule 2 C22	The limits in conditions C20 and C21 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B29 of this consent.	NA				
Tree Protection						



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
				Compliant	Non-compliant	Not Triggered
Schedule 2 C23	For the duration of the construction works: (a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; (b) all street trees must be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council; (c) all trees on the site that are not approved for removal must be suitably protected during construction; and (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.	No street trees were identified for removal. Kleinfelder, work with Aura Tree services and advise them what needs to come down and what is staying. Trees have been marked to identify what stays, what has a nest & what hasn't been decided on yet. Aura Trees don't cut any trees unless instructed by Kleinfelder who are on site the duration of tree removal activities. Kleinfelder maintain a daily log (unsighted). At the completion of works Kleinfelder will provide a report documenting clearing results in accordance with Appendix 4 of the Land Management Plan. In addition to marking/tagging, barrier fencing was observed around trees being retained, predominantly small clusters of trees rather than on an individual basis, notably around high traffic zones to the front of the site as opposed to the bottom area of the site adjacent the spoil and materials stockpiles.	General compliance with this condition has been demonstrated.			
	Rock Outcrops					
Schedule 2 C24	Rock outcrops must be protected during construction activities and appropriately fenced.	A number of rock outcrops located across the project site were observed without a physical form of protection during the site audit. Rock outcrops were typically observed as not being proximate to areas of work activity, with the exception of works along the perimeter access road and in the bottom car park area, and are otherwise located on the outer side of sediment fencing and/or site perimeter hoarding fencing Unplanned impact to rock outcrops as a result of construction activities on-site was not identified or observed during the site audit.	General compliance with this condition has been demonstrated.			
	Dust Minimisation					
Schedule 2 C25	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Stockpile covering was observed on the stockpiles located to the rear of the school building during the site audit. Some minor dust generating activities were noted on the 13/12/18 that being the dumping of construction material to the stockpile and excavation works to the front of the school. Emissions remained localised to the activity and did not leave site.	General compliance with this condition has been demonstrated.			
Schedule 2 C26	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 land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Stockpiles on the site were observed to be dry although covered with poly and geofabric sheeting. No trucks were observed leaving site on any of the audit days. There was no visible mud tracking from the project site onto the public road network. Dirt tracking was observed on 13/12/18 but not to significant quantities. Use of water as a suppressants was evidenced for localised activities on 11/12/18. Some minor land stabilisation activities were observed.	General compliance with this condition has been demonstrated.			
	Air Quality Discharges					
Schedule 2 C27	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	The daily log book for Pland ID #29 was sighted on 4th January 2019. Taylors inspection of plant stickers were observed on multiple pieces of mobile plant. No low quality emissions were observed during the site audit from exhausts of plant or equipment. There have been no reports or incidents regarding plant and equipment emissions on the project to date.	General compliance with this condition has been demonstrated.			
	Erosion and Sediment Control					



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
				Compliant	Non-compliant	Not Triggered
Schedule 2 C28	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.	A number of ErSed controls requiring attention and maintenance were observed across the three site audit visits, on 11 and 13 December, and 4th January. There was no evidence to suggest corrective actions were taken to address the ErSed controls needing attention within the audit period. Controls requiring maintenance were generally at capacity. A weekly environmental inspection checklist sighted (10 - 15 December) refers to sediment control "Are all sediment control measures followed , as per sediment control plan?" which affirmatively identified all controls being followed.	General compliance with this condition has been demonstrated. However, an approach to detail, record and monitor the implementation and close out of environmental preventive and corrective actions would be beneficial.			
	Imported Soil					
Schedule 2 C29	The Applicant must: (a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Department and/or Certifier upon request.	Importation of soil onto the project site has not commenced at time of site audit.	Not triggered.			
	Disposal of Seepage and Stormwater					
Schedule 2 C30	Any seepage or rainwater collected on-site during construction or groundwater must not be pumped to the street stormwater system unless separate prior approval is given in writing by the EPA in accordance with the Protection of the Environment Operations Act 1997.	External work areas have not been impacted by rainwater ingress.	General compliance with this condition has been demonstrated.			
	Aboriginal Cultural Heritage					
Schedule 2 C31	A representative of the Local Aboriginal Land Council must be present to observe any excavations greater than 1 metre in depth. In the event that any unexpected finds be discovered, any direction from the Local Aboriginal Land Council representative and the procedures outlined in Condition C32 must be followed.	Taylors have advised that excavation works on the project have not exceeded 1m in depth and no unexpected finds have been identified. Section 12.3.13 of Taylors PEMP provides a methodology for managing risk associated with heritage unexpected finds.	The requirement of the condition is not triggered.			
	Unexpected Finds Protocol- Aboriginal Cultural Heritage					
Schedule 2 C32	In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by OEH and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and OEH to develop and implement management strategies for all objects/sites. Works can only recommence with the written approval of OEH.	Advice provided during site audit interviews is that there has been no discovery of new Aboriginal objects from works on the project site. Section 12.3.13 of Taylors PEMP provides a methodology for managing risk associated with heritage unexpected finds.	The requirement of the condition is not triggered.			
	Unexpected Finds Protocol- Historic Heritage					
Schedule 2 C33	If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and the OEH Heritage Division contacted. Depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area. Works may only recommence with the written approval of Heritage Division of the OEH.	Advice provided during site audit interviews is that there has been no discovery of unexpected archaeological relics from works on the project site. Section 12.3.13 of Taylors PEMP provides a methodology for managing risk associated with heritage unexpected finds.	The requirement of the condition is not triggered.			
	Waste Storage and Processing					
Schedule 2 C34	Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	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. Occasional temporary waste storage outside of dedicated areas was infrequently observed and was not observed to be persistent across site audit dates. A minor amount of domestic litter was identified on site, however, this was found to be frequently attended to and did not accumulate between site inspections on the 11/12/18; 13/12/18 and 4/1/19.	General compliance with this condition has been demonstrated.			
Schedule 2 C35	All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	Monthly waste records are provided for the projects by Fresh Start Australia. Project waste reports for August 2018, September 2018, and October 2018 were reviewed.	General compliance with this condition has been demonstrated.			

Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
				Compliant	Non-compliant	Not Triggered
Schedule 2 C36	The body of any vehicle or trailer used to transport waste or excavation spoil must be covered before leaving the premises to prevent any spillage or escape of any dust, waste of spoil. Mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site must be removed before leaving the premises.	<p>No trucks transporting waste or other materials were observed leaving or entering site during the audit. Minor amounts of dust tracking were observed at the site gate.</p> <p>No rumble grids or underbody washdown areas were identified on site.</p> <p>There has been no reported incidents or complaints with respect to unacceptable transport of waste or other construction materials on the project to date.</p>	General compliance with this condition has been demonstrated.			
Schedule 2 C37	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	<p>Concrete waste is collected by a pump and dump Contractor.</p> <p>There have been no reported incidents of concrete waste or rinse water entering stormwater drains or any watercourses.</p>	General compliance with this condition has been demonstrated.			
Handling of Asbestos						
Schedule 2 C38	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 <i>Protection of the Environment Operations (Waste) Regulation 2014</i> with particular reference to Part 7 – ‘Transportation and management of asbestos waste’ must also be complied with.	<p>A number of asbestos related reports were reviewed as part of the the audit. These included:</p> <ul style="list-style-type: none"> - Targeted Asbestos Investigation and Sampling, August 2018 - Asbestos Core Sampling, Risktech, 22 August 2018 - Disposal of 3.5 Tonne of Asbestos Sheeting, Perfect Contracting 28 September 2018 - Asbestos Clearance Certificate, Airsafe, 2 October 2018 - Asbestos Identification Analysis, Greencap, 31 October 2018 - Asbestos Clearance Certificate, Risktech, 10 December 2018 	General compliance with this condition has been demonstrated.			
Community Engagement						
Schedule 2 C39	The Applicant must consult with the community regularly throughout construction, including consultation with the nearby sensitive receivers, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders.	<p>Project updates are provided to the community via the project internet page. https://www.schoolinfrastructure.nsw.gov.au/projects/lindfield-learning-village.html</p> <p>Where construction activities could possibly impact on nearby residents letter box drops have been deployed on the project.</p>	General compliance with this condition has been demonstrated.			
Incident Notification, Reporting and Response						
Schedule 2 C40	The Department 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. Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 1.	<p>A site project incident register was provided as part of the site audit. The register has two entries, the most recent incident, “Drilling of asbestos in music room from Mechanical”, dated December 2018.</p> <p>DP&E Compliance Team identify an incident as: “<i>an occurrence or a set of circumstances that causes or threatens to cause material harm</i>”.</p> <p>Based on this definition, the proponent has not identified any occurrences or a set of circumstances on the project required to be reported.</p>	General compliance with this condition has been demonstrated.			
Non-Compliance Notification						
Schedule 2 C41	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Department in writing to compliance@planning.nsw.gov.au within seven days after they identify any non-compliance. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	No notifications provided to DP&E at time of audit.	Not triggered			
Revision of Strategies, Plans and Programs						
Schedule 2 C42	Within three months of: (a) the submission of a compliance report under condition B55; (b) the submission of an incident report under condition C36; (c) the submission of an Independent Audit under condition B56; (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 Department and the Certifier must be notified in writing that a review is being carried out.	Not triggered. First compliance report will be the Pre-construction Compliance Report which would trigger the review under C42 in February.	Not triggered.			



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status		
				Compliant	Non-compliant	Not Triggered
Schedule 2 C43	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 Certifier. Where revisions are required, the revised document must be submitted to the Certifier for approval within six weeks of the review. 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.	DPE requested revision to the Compliance Monitoring and Reporting Program submitted 26/10/18. Revision 3 of the CMRP issued by Aspect on 11/1/19. No other triggers for the condition have been identified.	General compliance with the condition has been demonstrated.			
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 Department 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 C41 or, having given such notification, subsequently forms the view that an incident has not occurred.	Not triggered	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.	Not triggered	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.	Not triggered	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.	Not triggered	Not triggered			
Additional Approvals						
Ku-ring- gai Council						
(B54) Council Conditions of Construction for Approval Works in the Public Road	Roads Act Section 138 & 139 dated 5 November 2018 Drawing # TCI-6200 & TCI-6201, issue B, prepared by Birzulis Consulting Structural & Civil Engineers, dated 15/10/2018 and displaying council stamp (5 November 2018). Permit Details: Council Permit to Opening a Public Place Roads Act 1993 Section 101 and 102 Application No.: ROP 18/0272 Licence No: 113546C Date: 19 November 2018	Works had not yet commenced at time of site audit 11th and 13th December. On returning to site 4th January 2019, works had been completed.	Not triggered at time of audit.			

APPENDIX B – APPROVAL & DOCUMENT LIST

B1. APPROVAL AND DOCUMENTATION LIST

Environmental Impact Statement

Lindfield Learning Village EIS was produced by URBIS and dated 8th June 2017.

State Significant Development 8114 – Partial Development Consent

SSD 8114 dated 24th October 2018.

B7 Vegetation Management Plan (VMP)

A VMP was not referenced during audit.

B13 Landscape Management Plan

The landscape management plan has been produced by Kleinfelder. The plan is dated 24 August 2018.

B14 Contaminated Site Investigations

The following reports and correspondence have been viewed and satisfies CoC B14.

- Virgin Excavated Natural Material Assessment, EIS, 13 November 2018
- Interim Advice #08 for Statutory Site Audit No. 279 by Dr Ian Swane, Review of Staging of RAP for Lindfield Learning Village Project, 8th November 2018
- Interim Advice #11 for Statutory Site Audit No. 279 by Dr Ian Swane, RAP Addendum for Lindfield Learning Village Project, 21st November 2018

B16 Remediation Action Plan (RAP)

A RAP has been produced by EIS. The RAP is dated 16 August 2018.

B17 Unexpected Contamination Procedure

An unexpected contamination procedure is provided within the RAP.

B21 Community Communication Strategy

A Community Communication Strategy dated October 2018 was produced by NAME OF CONSULTANT

B29 Construction Environmental Management Plan

Zoic Environmental produced the project CEMP. The plan is dated 29 October 2018.

B30 The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP)

Commercial TC produced the CTPMSP. The plan is dated 2 October 2018.

B31 The Construction Noise and Vibration Management Sub-Plan (CNVMSP)

The CNVMSP was produced by Acoustic Logic. The plan is dated 5th October 2018.

B32 The Construction Waste Management Sub-Plan (CWMSP)

The following documents have been prepared to satisfy CoC B32:

- Dumpit Bins, Waste and Recycling Process & Flow, Not dated
- Foresight Environmental - Construction and Demolition Waste Management Plan, 27 March 2017
- Pure Contracting- Asbestos Removal Control Plan, 10 August 2018

B33 Construction Soil and Water Management Plan (CSWMSP)

A construction soil and water management plan was not reviewed as part of the audit.

B34 Construction Flora and Fauna Management Sub-Plan (FFMSP)

The FFMSP has been prepared by Kleinfelder. The plan is dated October 2018

B35 Bush Fire and Flood Emergency Response Sub-Plan (BFFERSP)

EWFW Consulting Engineers produced the BFFERSP. The plan is dated 18 October 2018

B42 Conservation Management Plan (CMP)

URBIS produced the project CMP. The plan is dated 6 November 2018.

B43: Heritage Implementation Strategy (HIS)

A HIS was produced by URBIS. The strategy is dated 14 November 2018.

C1 Heritage Interpretation Strategy

A Heritage Interpretation Strategy was produced by URBIS. The strategy is dated 28 November 2019.









B2. EMS and CEMP DOCUMENTATION LIST

The following documents were referenced as part of the on-site environmental performance assessment:

- Incident Register with two events, most recent entry December 2018
- Legal Requirements Register, empty with no entries
- Site induction SE-F-11, dated January 2018
- Safety Data Sheet (SDS) Register SE-F-10 (not dated)
- Toolbox / Daily Pre-Start Talk SE-F-20
 - High Risk Works – Tree Cutting 03/01/2019
 - Toolboxes for 28 & 29 November 2018 references Wet Weather
 - Toolbox for 7 January 2019 make reference to excavation exclusion zone below 1m, wet weather notice, maintenance of stormwater protection, and a general environmental note regarding housekeeping and stockpile management.

- Safe Work Method Statements (SWMS)
 - KLF F&F 03: Vegetation Quadrat Surveys and Collecting Vegetation Samples, August 2018
 - KLF 21: SWMS - Use of Mulcher, September 2018
 - Site Clearing Works – All Plant and Operations, Aura Trees, 2 August 2018
- Bushfire Evacuation Plan A3, Taylors', not dated
- Site Evacuation Plan A3, Taylors', not dated
- Construction Noise Monitoring 06-13 December, Marshall Day, 14 December 2018
- Delivery schedule (Traffic management) for 5 December.
- Environmental Inspection Records
 - Weekly Checklist 10th – 15th December 2018
- Asbestos Management
 - Targeted Asbestos Investigation and Sampling, August 2018
 - Asbestos Core Sampling, Risktech, 22 August 2018
 - Disposal of 3.5 Tonne of Asbestos Sheeting, Perfect Contracting 28 September 2018
 - Asbestos Clearance Certificate, Airsafe, 2 October 2018
 - Asbestos Identification Analysis, Greencap, 31 October 2018
 - Asbestos Clearance Certificate, Risktech, 10 December 2018
- Waste Disposal Records
 - Records for August 2018, September 2018, October 2018, Fresh Start Australia
- Tree Removal Records
 - At Risk Tree – Aboricultural Report Tree 49, Rain Tree Consulting, 19 November 2018
 - At Risk Tree – Aboricultural Report Tree 66, 67 & 96, Rain Tree Consulting, 19 November 2018
 - At Risk Tree – Aboricultural Report Tree 88, Rain Tree Consulting, 19 November 2018

APPENDIX C - SITE AUDIT PHOTO LOG

Management Area	Bushfire			
Relevant CoCs: B5 - B12 Bushfire	Date: 13/12/2018 Description: Removed trees observed at boundary fence 	Date: 13/12/2018 Description: Area of landscaping after tree clearing in lower carpark 	Date: 13/12/2018 Description: Removed vegetation observed to the rear of the school has the potential as fuel load for bushfire 	
Management Area	Landscaping			
Relevant CoCs: B13 Landscaping	Date: 11/12/2018 Description: Dense vegetation pre-tree felling in lower carpark 	Date: 04/01/2019 Description: Lower carpark after tree and vegetation removal 	Date: 04/01/2019 Description: Mulching activities taking place to rear of the school 	
Management Area	Construction Noise Limits			
Relevant CoCs: B31 Construction Noise & Vibration C16 - C19 Construction Noise Limits	Date: 04/01/2019 Description: Noise monitoring station observed 	Date: 04/01/2019 Description: Noise monitoring in lower car park 		

C34 - C37 Waste Storage and Processing



Management Area

Construction Soil and Water Management

Relevant CoCs:
B33 Construction Soil and Water Management Plan
C28 Erosion and Sediment Control

Date: 13/12/2018
 Description: Sediment laden geotextile drain cover



Date: 13/12/2018
 Description: Filter socks and geotextile observed in good condition



Date: 13/12/2018
 Description: Filter socks removed from drain



Management Area

Heritage

Relevant CoCs:
B42 - B47 Historic Heritage
C1 Interpretation Strategy

Date: 04/01/2019
 Description: New installed compliant handrails painted pink in reference to heritage requirements



Date: 04/01/2019
 Description: New installed compliant handrails painted pink in reference to heritage requirements





Management Area

Rock Outcrops

Relevant CoCs:
C24 Rock Outcrops

Date: 11/12/2018
Description: Exposed rock outcrops with no protection measures



Date: 11/12/2018
Description: Construction materials stored against exposed rock outcrops



Date: 13/12/2018
Description: Exposed rock outcrops with no protection measures



Management Area

Dust Minimisation & Air Quality

Relevant CoCs:
C25 & C26 Dust Minimisation
C27 Air Quality Discharges

Date: 13/12/2018
Description: Stockpiling activities generating dust

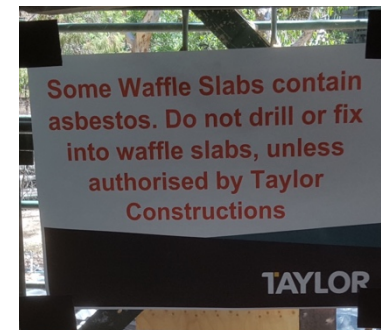


Date: 13/12/2018
Description: Stockpile covering



Date: 04/01/2019
Description: Previous stockpile area cleared





APPENDIX D - INDEPENDENT AUDIT DECLARATION FORM

Independent Audit Declaration Form

Project Name: Lindfield Learning Village

Consent Number: SSD 8114

Description of Project: Refurbishment of the former University of Technology Sydney (UTS) Ku-ring-gai campus into a new school.

Project Address: Lot 2 DP1151638, 100 Eton Rd, Lindfield NSW 2070

Proponent: Department of Education

Title of Audit: Independent Environmental Audit – SSD Construction Compliance Report

Date: 01/02/2019

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.

Notes:

(a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

(b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor: Richard Johnson

Signature:



Qualification: BSc; Dip Law

Company: Aspect Environmental Pty Ltd

Company Address: Suite 117, 25 Solent Circuit, Baulkham Hills, NSW 2153