

Penshurst Public School Independent Audit Report

Prepared by Bonnie Mulholland Certified by Kobi Simmat

Penshurst Public School Project

Project Number: 6280

Development Consent Application Number: SSD 8365

| Revision | Author | Purpose/Change | Certified by | Date |
|----------|--------------------------------|--------------------------------------|----------------------|----------------|
| 1.0 | Bonnie Mulholland (Auditor) | Draft for proponent review | Kobi Simmat (CEO) | 5 August 2019 |
| 2.0 | Bonnie Mulholland (Auditor) | Second Draft with proponent Feedback | Kobi Simmat (CEO) | 26 August 2019 |
| | | | | |



Table of Contents

| Introduction | 4 |
|--|----|
| Background | 4 |
| Audit Team | 4 |
| Audit Objectives | 4 |
| Audit Scope | 4 |
| Audit Period | 5 |
| Table 1: Audit Schedule | 5 |
| Audit methodology | 6 |
| Selection and endorsement of audit team | 6 |
| Independent Audit scope development | 6 |
| Environmental Compliance | 6 |
| Table 2 - Audit criteria development | 6 |
| Environmental Performance | 7 |
| Compliance evaluation | 7 |
| Compliance status | 7 |
| Table 3: Compliance status descriptors | 7 |
| Opportunities for Improvement | 8 |
| Post-approval document adequacy | 8 |
| Pre-Audit EMP and Sub-plan review | 8 |
| Onsite project document review | 8 |
| Site interviews | 9 |
| Site inspections | 9 |
| Consultation | 10 |
| Compliance status descriptors | 10 |
| Audit Findings | 11 |
| Approval and document list | 11 |
| Compliance performance | 11 |
| Summary of agency notices, orders, penalty notices or prosecutions | 11 |
| Non-compliances | 11 |
| Previous audit recommendations | 11 |
| EMP, Sub-plans and post approval documents | 11 |
| Environmental Management System | 12 |
| Roles and Responsibilities | 12 |
| Environmental Training | 12 |
| Control of system documentation | 13 |
| Environmental performance | 13 |
| Consultation outcomes | 13 |
| Complaints | 13 |
| Incidents | 13 |
| Actual versus predicted environmental impacts | 13 |
| Site inspection | 13 |
| Site interviews | 14 |
| Previous Annual Review or Compliance Report recommendations | 14 |



| Improvement opportunities | 14 |
|--|----|
| Key strengths | 14 |
| Recommendations | 15 |
| Non-conformances | 15 |
| Opportunities for Improvement | 16 |
| Appendices | 17 |
| Appendix A – Independent Audit Tables | 17 |
| Appendix B – Planning Secretary Audit Team Agreement | 17 |
| Appendix C – Consultation | 17 |
| Appendix D – Independent Audit Declaration Form | 17 |
| Appendix E – Technical Specialists Reports N/A | 17 |
| Appendix F – Site Inspection Photographs | 17 |
| Appendix G - Audit Program | 17 |
| | |



1. Introduction

1.1. Background

The Penshurst Public School Project involves removal of existing school buildings, site remediation and earthworks, and construction of a new multi-storey school. Construction is being undertaken by Grindley Construction Pty Ltd for Schools Infrastructure NSW (SINSW). At the time of the audit demolition of the former buildings was complete. Site remediation works were underway to remove asbestos contaminated material onsite.

Best Practice Pty Ltd has been approved to undertake an independent audit of the project in accordance with Development Consent SSD 8365 and the Independent Audit Post Approval Requirements (Post Approval Requirements).

A copy of the Audit Program (including the audit schedule and audit criteria) is provided in Attachment G.

1.2. Audit Team

The Audit team is comprised of:

- Bonnie Mulholland (Lead Auditor)
- Kobi Simmat (Certifier)

1.3. Audit Objectives

Refer to Section 2.2

1.4. Audit Scope

A copy of the audit criteria is provided in Appendix Refer also to Section 2.2



1.5. Audit Period

The onsite audit was conducted over 3 days 30 July 2019 - 1 August 2019.

An updated version of the Audit Table (to reflect the timing of the Initial Independent Audit), from the submitted Audit Program (Attachment G), is provided in Table 1 below.

Table 1: Audit Schedule

| Audit type | Timing | Scheduled date |
|------------------------------|--|----------------|
| Initial independent audit | Within 8 weeks from notified commencement date of construction | July 2019 |
| Subsequent independent audit | Within 6 months from the date of the initial construction audit | Nov 2019 |
| Annual construction audit | At intervals no greater than 52 weeks* | Nov 2020 |

*may be undertaken in concurrence with Third-Party ISO 14001 EMS Audit



2. Audit methodology

2.1. Selection and endorsement of audit team

The audit team comprised of Bonnie Mulholland and Kobi Simmat, as approved by the Planning Secretary (refer to Appendix B). No technical specialists were utilised for the audit.

2.2. Independent Audit scope development

2.2.1. Environmental Compliance

To develop the Audit Tables the audit team reviewed key documents accessed via Grindley's management software program *Procore* and the NSW Government Schools Infrastructure webpage for Penshurst Public School Upgrade as detailed in Table 2 below.

https://www.schoolinfrastructure.nsw.gov.au/projects/p/penshurst-public-school.html

| Document | Accessed via | Criteria included in Audit Tables |
|--|--------------------|--|
| Development Consent SSD 8365 | SINSW website | Environmental conditions relevant to the current phase of the development: Part A - Administrative conditions Part B - Prior to commencement of construction Part C - During construction |
| Grindley Project Specific Environmental Management Plan, Rev 1 (26/2/19) | Procore (Grindley) | All requirements included in the plan |

Table 2 - Audit criteria development

2.2.2. Environmental Management Plans and Sub-plans

As outlined in the Audit Program the audit scope also includes a review and evaluation of the project's Environmental Management Plans and Sub-plans, including whether the relevant plans and procedures:

- have been developed in accordance with the conditions of the Development Consent
- are being implemented in accordance with the Development Consent
- are adequate to achieve compliance with the Development Consent, taking into consideration whether there are any non-compliances resulting from implementation of the documents
- whether there are any opportunities for improvement

Refer to Section 2.3.3 for further detail.



2.2.3. Environmental Management System

As outlined in the Audit Program the audit scope also includes a high-level review of the Project EMS, including:

- An assessment of any Third Party Certification of the Project EMS
- The type, nature and scope of the Project EMS in relation to the Project
- Implementation of the Project EMS
- Identification of any key deficiencies in the Project EMS

2.2.4. Environmental Performance

In accordance with the Post Approval Requirements, the scope of Independent Environmental Audits is to include an assessment of environmental performance, including:

- Actual impacts compared to predicted impacts in the Environmental Assessment
- The physical extent of the development compared to the approved boundary, and any off-site impacts
- Incidents, non-compliances and complaints in the audit period
- The performance of the development in relation to:
 - Agency policy
 - Particular environmental issues identified through stakeholder consultation (see below)
- Feedback from Agencies and stakeholders on the performance of the project in the audit period

2.3. Compliance evaluation

2.3.1. Compliance status

To determine compliance with the audit criteria, the compliance status descriptions of the Independent Audit Requirements were adopted, as outlined in Table 3 below.

| Status | Description | | | |
|---------------|--|--|--|--|
| Compliant | Sufficient verifiable evidence collected to demonstrate that all elements of the requirements 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 | The 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. | | | |

Table 3: Compliance status descriptors



2.3.2. Opportunities for Improvement

Opportunities for improvement have also been noted, based on the auditors' experience.

2.3.3. Post-approval document adequacy

2.3.3.1. Pre-Audit EMP and Sub-plan review

The following documents available from *Procore* and the SINSW website were also reviewed prior to the audit:

- Penshurst Public School Project Community Consultation Strategy, April 2019
- Erosion and Sediment Control Plan CIV-CD-01-008 Rev 1
- Day Design Acoustic Assessment Report Rev C (3/4/2018)
- Root Partnerships Waste Management Plan Rev 3 (2/2/18)

These documents were reviewed prior to the audit to determine whether:

- The plans adequately address the criteria specified in the Development Consent (i.e. conditions (i.e. B17 B22)
- The requirements of the plans are not inconsistent with the relevant conditions of the Development Consent
- The plans content are adequate to ensure the relevant conditions of the Development Consent are met during construction (i.e. Part C of the development consent)

Items of concern were tabled for discussion and clarification during the audit.

2.3.3.2. Onsite project document review

The following documents were also made available during the audit:

- Impact Mitigation Plan IMP006 Air Quality and Dust
- Impact Mitigation Plan IMP004 Waste Management
- Grindley Construction Environmental Management Manual
- Chalouhi Demolition and Waste Management Plan Version 1.1 15/3/19

These plans were reviewed in relation to project activities to determine whether:

- The plans were being implemented in accordance with the conditions of the development consent
- Implementation of the plans had resulted in any non-conformances with the conditions of the Development Consent
- The requirements of the plans were being complied with
- Whether there were any opportunities for improvement to the plans and how they are being implemented by the companies environmental management system.



2.4. Site interviews

Various site personnel were interviewed throughout the audit process, including:

Rodney Peachey (Senior Project Manager)

• Oversees compliance at project level

Mitchell Thornbury (Contracts administrator)

- Administration of Environmental Management System
- Subcontractor management

Steve McInerney (Site Manager)

- Manage day to day works, including environmental aspect
- Daily and Weekly Inspections

Craig Young (WHSEQ Manager)

• Environmental support and compliance

Archie Cuthill (Trainee Contracts Administrator)

Graham Cunningham (Root Partnerships) attended site on the morning of 31 July.

David Wood (Root Partnerships) dialled into the closing meeting.

2.5. Site inspections

The audit was conducted onsite with the Project Team, allowing for site access as required. 3 Site inspections were undertaken as follows:

Site familiarisation walk

30 July 2019 10:00am - 10:30am Following the opening meeting, an initial site inspection was undertaken for the auditor to familiarise themselves with the site conditions and activities

Environmental compliance inspection

31 July 2019 10:30 - 11:30am

In addition to the site team the following representatives were undertaking a site inspection:

- Peter Krause (SINSW)
- Graham Cunningham (Root Partnerships)
- Kate Moore (DP&E)
- Michaela Burgess (DP&E)



Compliance and implementation verification inspection

1:30pm - 2:00pm, 1 August

The auditor noted items requiring verification/evidence throughout the audit and a final inspection was undertaken on the last day to collect further evidence and verify statements made during the audit.

2.6. Consultation

The Audit Program was submitted to SINSW on Monday 8 July, for review/comment. No feedback or comments were provided.

Consultation with key stakeholders on audit scope development was not undertaken, resulting in a non-conformance. Further detail is provided in the Audit Tables (Appendix A).

2.7. Compliance status descriptors

Refer to Section 2.3.



3. Audit Findings

3.1. Approval and document list

- Development Consent SSD 8365
- Grindley Project Specific Environmental Management Plan, Rev 1 (26/2/19)
- Penshurst Public School Project Community Consultation Strategy, April 2019
- Erosion and Sediment Control Plan CIV-CD-01-008 Rev 1
- Day Design Acoustic Assessment Report Rev C (3/4/2018)
- Penshurst Public School Project Community Consultation Strategy, April 2019
- Root Partnerships Waste Management Plan Rev 3 (2/2/18)
- Impact Mitigation Plan IMP006 Air Quality and Dust
- Impact Mitigation Plan IMP004 Waste Management
- Grindley Construction Environmental Management Manual
- Chalouhi Demolition and Waste Management Plan Version 1.1 15/3/19

3.2. Compliance performance

Compliance with one hundred and twenty-nine (129) conditions was assessed. Six (6) non-conformances were identified. A number of Opportunities for improvement were also identified. These were amalgamated where possible, with eleven (11) identified in total.

3.3. Summary of agency notices, orders, penalty notices or prosecutions

There had not been any agency notices, order, penalty notices or prosecutions at the time of the audit.

3.4. Non-compliances

Refer to Section 4.1

3.5. Previous audit recommendations

No previous audits to date.

3.6. EMP, Sub-plans and post approval documents

The audit scope included a review and evaluation of the project's Environmental Management Plans and Sub-plans, including whether the relevant plans and procedures:

- have been developed in accordance with the conditions of the Development Consent
- are being implemented in accordance with the Development Consent
- are adequate to achieve compliance with the Development Consent, taking into consideration whether there are any non-compliances resulting from implementation of the documents
- whether there are any opportunities for improvement



The Contractor may consider reviewing system documentation (e.g. the CEMP, Site Induction, Forms and Checklists) to ensure key requirements of the Development Consent and Impact Mitigation Plans are communicated, for example:

- C27: Water from site must not be pumped to the street stormwater system without prior EPA approval.
- C33: The Applicant must ensure that concrete waste and rinse water are not disposed of on the site (i.e. washout in a designated area)
- C16 Audible movement alarms to be of a type that minimise noise impacts on surrounding noise sensitive receivers (i.e. 'squelchers' not 'squarkers').
- EMP19-D: It is recommended that the Environmental Inspection Forms be amended to reflect the requirements of the CEMP, Impact Mitigation Plans and Development Consent.

The Contractor may consider undertaking an environmental risk assessment to determine if any additional procedures/forms are required, e.g. wet weather preparation checklist/sediment basin operation procedure / offsite pumping procedure/dewatering approval form.

3.7. Environmental Management System

3.7.1. Roles and Responsibilities

Under the CEMP there are no responsibilities allocated to the WHSEQ Manager. Grindley may consider updating the CEMP to include the WHSEQ Managers role (e.g. internal audits, review of management plans, support, compliance etc).

3.7.2. Environmental Training

The CEMP identifies the Site Manager (Steve McInerney) as the Environmental Officer for the project. Steve demonstrated his practical experience and understanding of site environmental management, which translated into good environmental performance on site. Steve holds a Bonded Asbestos Removal Certificate.

Craig Young is the HSEQ Manager for the site. Craig identified his role for the project as including environmental compliance and support.

Grindley may consider determining what level of training is required for environmental roles on projects, e.g. environmental due diligence/duty of care, environmental risk assessment, and relevant technical aspects (e.g. Erosion and Sediment Control).

Valuable courses may include:

- ESC for Site Managers
- IECA POEO Act 1 day Workshop
- Introductory / Intermediate ESC Training (1 day)
- General Environmental Training

The Site Manager and HSEQ Manager for the development are appropriately qualified for the roles being undertaken on site.



3.7.3. Control of system documentation

The Contractor may consider reviewing the CEMP to ensure references to system documents are up to date and correct versions are available. Some examples are provided below:

- The EMP contains reference to redundant forms (e.g Form 129, refer to Item EMP-18C in Audit Tables).
- At the time of the audit multiple versions of the EMP were onsite. Both Rev 1 and Rev 2 copies of this plan were observed in the office. The EMP used onsite was different to the CEMP submitted as part of the project documentation.
- There are EMS procedures which have not been reviewed for over 5 years, e.g. Grindley Construction Environmental Management Manual v5 (17/2/13) and Accident Incident Reporting and Investigation Procedure (23/5/13)
- The version table on the EMP does not include the author or evidence of approval (e.g. signature).

3.8. Environmental performance

Site environmental performance was generally very good. Processes and systems to support performance can be improved.

3.9. Consultation outcomes

Refer to Section 2.6

3.10. Complaints

Refer to Appendix A, DC-35

3.11. Incidents

No environmental incidents had been reported at the time of the audit.

3.12. Actual versus predicted environmental impacts

No notable difference between actual and predicted impacts documented in environmental impact assessment.

3.13. Site inspection

Refer to Appendix A and F.



3.14. Site interviews

Refer to Appendix A.

3.15. Previous Annual Review or Compliance Report recommendations

NA - no previous actions identified.

3.16. Improvement opportunities

Refer to Section 4.2

3.17. Key strengths

- Good onsite control of environmental aspects
- Site Team takes responsibility for environmental management onsite
- Site Team has good knowledge of Development Consent requirements and General Environmental Management requirements
- Effective and proactive management of subcontractor issues as they arise, e.g. through Grindley non-conformance process
- Proactive ongoing communication with the adjacent school to mitigate potential impacts
- Strong commitment to the improvement of the Environmental Management System



4. **Recommendations**

4.1. Non-conformances

DC-A21: Condition A21 of the Development Consent requires that certain documents must be available on the website. The following documents are not currently available on the project SINSW website: Compliance Report, Complaints Register, Current Environmental Management Plan, Erosion and Sediment Control Plan CIV-CD-01-008 (Soil and Water Management Plan). These documents are to be made available on the SINSW Project website.

DC-B22: Condition B-22 subsection (c) of the Development Consent requires that a Soil and Water Management Plan must address how all construction works will be managed in wet-weather events. Amend ESC Plan to include how all construction works will be managed in a wet-weather events (e.g. storage of equipment, stabilisation of the Site, temporary drainage controls to direct runoff to sediment basin, responsibility for wet weather preparation checklist).

DC-C37: Condition C37 of the Development Consent requires the Audit Program to be submitted to DP&E no later than 4 weeks after the date notified for the commencement of construction. The date notified for the commencement of construction was 2/4/19. The Audit Program was submitted on 8/7/19, approximately 13 weeks after the date notified for the commencement of construction. SINSW notified DP&E of the non-compliance on 18/7/19. The proponent is compliant with the action but was non-compliant with the timing of the action

DC-C38: Condition C38 of the Development Consent requires an initial construction Independent Audit to be undertaken no later than 8 weeks after the date notified for the commencement of construction. Construction commenced on 2/4/19. The initial construction Independent Audit commenced on 30/7/19. SINSW notified DP&E of the non-compliance on 18/7/19.

DC-C39: Condition C39 of the Development Consent requires the Independent Audit to be carried out in accordance with the Independent Audit Post Approval Requirements. Consultation with key stakeholders on audit scope development was not undertaken as required by Section 3.2 of the Independent Audit Methodology Requirements in the Independent Audit Post Approval Requirements. Key agency and stakeholder contacts (e.g. DP&E, EPA, Council, sensitive receivers) are to be provided to the Independent Auditor in preparation for subsequent independent audit (planned for December 2019).

DC-C43: Condition C43 of the Development consent requires that the Department be notified in writing within seven days after becoming aware of any non-compliance. The Department was not notified in writing within seven days after the applicant becoming aware of the non-compliance with Conditions C37 & C38.



4.2. Opportunities for Improvement

In addition to identifying and making recommendations about non-conformances, the auditor may make observations and notes, including identifying any opportunities for improvement, as they see fit in relation to any compliance requirement or any other aspect of the development. Opportunities for improvement recommended by the auditor must be based on the auditor's experience. It is noted that matters raised remain compliant with the conditions of consent under the current development scenario.

DC-A21: A link to the Day Design Acoustic Assessment Report and Root Partnerships Waste Management Plan has been provided via the SSD application page on the Department of Planning and Environment website (3 mouse clicks). It is recommended that a direct link to the plans be provided on the applicants' project website to ensure accessibility.

DC-A22: The Contractor may consider reviewing and amending the site induction to ensure it includes reference to relevant requirements of Development Consent (e.g. rock hammering hours, obligation to minimise harm to the environment) and environmental legislation (e.g. POEO Act).

EMP-10G(b): The Contractor may consider undertaking an environmental risk assessment to determine if any additional work method statements/procedures/forms are required, e.g. wet weather preparation checklist/sediment basin operation procedure / offsite pumping procedure/dewatering approval form.

EMP-10G(b)/EMP-14A: There was minimal evidence that Waste Management Plans and Subcontractor Management Plans were reviewed by the Site Team. The Contractor may consider reviewing and amending the process for the development, review and approval of management plans, to ensure the process is adequate, practical and implemented.

EMP-10H & 11A: The Contractor may consider reviewing the Environmental Inspection Forms to include guidelines around adding photographs and observations to evidence that onsite monitoring of environmental practices has occurred, and to demonstrate environmental compliance. Training and awareness in environmental due diligence and duty of care may also be of benefit.

DC-C35(a): The Applicant has not had regular consultation with the adjacent school throughout construction. It is recommended that regular meetings be held with nearby sensitive receivers (e.g. schools).

DC-C35(a): Discussions on-site indicate that ongoing consultation is being undertaken with the adjacent school by the Contractor. There is evidence of complaints being effectively addressed (e.g. privacy screen). Evidence of community notifications was provided post-audit. However, there is not a clear plan for how ongoing consultation with sensitive receivers will be undertaken during construction and how it is being implemented. Maintenance of a construction consultation register would assist to monitor this, including identification of sensitive receivers, consultation obligations/objectives, strategies for achieving them, and citing records of consultation activities.



DC-16 / DC-33 / DC-27 / EMP-19D: It is recommended that system documentation, e.g. the CEMP, Site Induction, Forms and Checklists be reviewed to ensure key requirements of the Development Consent and Impact Mitigation Plans are communicated, including audible alarm type, concrete washout, off-site pumping and Impact Mitigation Plans (refer to Section 3.6 for further information).

Environmental Training: Grindley may consider determining what level of training is required for environmental roles on projects, e.g. environmental due diligence/duty of care, environmental risk assessment, and relevant technical aspects (e.g. Erosion and Sediment Control).

Roles and Responsibilities: Grindley may consider updating the CEMP to include the WHSEQ Managers role (e.g. internal audits, review of management plans, support, compliance etc).

Control of system documentation: The Contractor may consider reviewing the CEMP to ensure references to system documents are up to date and correct versions are available.

5. Appendices

Appendix A – Independent Audit Tables

Appendix B – Planning Secretary Audit Team Agreement

Appendix C – Consultation

Refer to Section 2.6

Appendix D – Independent Audit Declaration Form

Appendix E – Technical Specialists Reports N/A

Appendix F – Site Inspection Photographs

Appendix G - Audit Program

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|---------|--|--|--|----------------|--|---|---|---|
| DC-A1 | Obligation to minimise harm to environment | 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. | | All | No evidence of potential material environmental harm observed. | | Compliant | |
| EMP-10G | Management Plans | Site Management Team responsible for production, review and approval of Work Method Statements and Waste Management Plan | Pre-construction and During Construction | Contractor | Root Partnerships Waste Management Plan Rev 3 (2/2/18) adopted by Grindley and submitted as part of CEMP to SINSW and PCA 22.03.19. Chalouhi Demolition and Waste Management Plan Version 1.1 (15/3/19) unsigned by member of Site Management team. Inspection Test Plan 001 Demolition (31/5/19) verifies Demolition Management Plan was prepared 20/3/19. ITP unsigned by Contractor Site Team member. No evidence of plan review by Site Management Team. Site Manager advised there are no Environmental Work Method Statements for the project. Discussion with PM and WHSEQ Manager around document review and approval process. Does not appear to be a formal process in place for reviewing and approving plans. | and approved for the project, but there is little or no evidence that the plans were reviewed by the Site Management Team. The Contractor has not developed any environmental work method statements, e.g. Sediment Basin Operation. In the Response to Draft Independent Audit Program Root Partnerships comment: Grindley have done an environmental aspects impact register. Grindley | | (a) The Contractor may consider reviewing and ammending the process for the development, review and approval of management plans, to ensure it is adequate, practical and implemented. (a) The Contractor may consider undertaking an environmental risk assessment to determine if any additional work method statements / procedures / forms are required, e.g. wet weather preparation checklist / sediment basin operation procedure / offsite pumping procedure / dewatering approval form. |
| EMP-14A | Management Plans | The Site Manager will review all Subcontractor Management Plans and waste management plans submitted and obtain approval from Project Manager before allowing work to commence on site | Pre-construction | Contractor | Chalouhi Demolition and Waste Management Plan Version 1.1 (15/3/19) unsigned by member of Site Management team. Inspection Test Plan 001 Demolition (31/5/19) verifies Demolition Management Plan was prepared 20/3/19. ITP unsigned by Contractor Site Team member. No evidence of plan review by Site Management Team. Discussion with Site Manager: no other Subcontrctor Environmental Management Plans currently required. | Waste Management Plans have been submitted to the Principal. The plan may be considered deemed to be approved by the PM and Principal through issueing of Crown Building Certificate for Penshurst Public School dated 2/4/19 Ref: GDL 16048 by PCA. No evidence that plans were reviewed by the Project Manager prior to works commencing. | Compliant Opportunity for Improvement | The Contractor may consider reviewing and amending the process for the development, review and approval of management plans, to ensure the process is adequate, practical and implemented. |
| EMP-19E | Management Plans, Waste | A Waste Management Plan will be developed in conjunction with the selected waste contractor for the project and will be audited at random intervals throughout the course of the project. | Pre-construction | Contractor | Reviewed Root Partnerships Waste Management Plan Rev 3 (02/02/18). Sighted evidence that the Subcontractor (Chalouhi) has adopted this plan: Subcontract, Attachment 16 Item 4.25 Waste Management Plan. Chalouhi Demolition and Waste Management Plan Version 1.1 (15/3/19) addresses management of demolition waste. Grindley Weekly Environmental Inspection includes inspection of waste management: Items 1.4 Waste Management Plan / Impact Mitigation Plan is available, 1.6 Storage area clean and tidy, 3.12 Waste being removed in accordance with local EPA. Sighted records of Grindley Weekly Environmental Inspections. | The Project Waste Management Plan has been adopted by the Subcontractor. The Subcontractor has submitted its own Demolition Waste Management Plan. Waste management is inspected in Weekly Environmental Inspections. Reviewed Grindley Weekly Environmental Inspections 17/4/19, 29/7/19. Includes inspection of waste management: Items 1.4 Waste Management Plan / Impact Mitigation Plan available, 1.6 Storage area clean and tidy, 3.12 Waste being removed effectively, 3.13 Hazardous materials being removed in accordance with local EPA. Site Manager does weekly environmental inspections. WHSEQ Managers visit monthly and Complete WHSEQ Monthly Project Inspection. Reviewed checklist completed by Jeff Leys, dated 25/7/19. Same criteria as weekly checklist. | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|--|---|--|----------------|--|---|---|--|
| DC-A21 | Access to Information | Documents must be available on the website including: • Statutory Approvals • Strategies Plans and Programs • Reporting on environmental performance • Summary of monitoring results • Complaints register • Audit reports Information must be kept up to date | Pre-construction and During Construction | Principal | (SINSW PPS website): https://www. schoolinfrastructure.nsw.gov.au/projects/p/penshurst- public-school.html Grindley Environmental Management Plan Revision 1, dated 12/06/19. Submitted to SINSW and Principal Certifying Authority (PCA) 22.03.19. Contractor Erosion and Sediment Control Plan (CIV-CD- 01-008 Rev 1). | The following documents are not currently available on the SINSW website: - Compliance Report - Complaints Register - Current CEMP (revision 2) - Erosion and Sediment Control Plan CIV-CD-01- 008 (Soil and Water Management Plan) A link to the Day Design Acoustic Assessment Report and Root Partnerships Waste Management Plan has been provided via the SSD application page on the Department of Planning and Environment website (3 mouse clicks). It is recommended that a direct link to the plans be provided on the applicants project website to ensure accessibility. | Non-compliant Opportunity for Improvement | The following documents are to be made available on the SINSW Project website: Compliance Report, Complaints Register, Current CEMP, Current Soil and Water Management Plan. |
| DC-A22 | Subcontractor Management Training and Awareness | 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 | Pre-construction and During Construction | Contractor | Earthworks Subcontract lists the Development Consent in the document register. Reviewed email from Contractor to Earthworks Subcontractor verifying that their contract allows for specific relevant conditions, e.g. C-14 - C20. Reviewed Contractor site specific induction. Includes incident notification, non-conformance, working hours, site access, plant maintenance, hazardous chemicals, unexpected finds, Dust, Noise, ESC, Flora and Fauna, Tree Protection, and Cultural Heritage requirements. No reference to rock hammering hours. Lists the Development Consent. No reference to Environmental Legislation, e.g. POEO Act. Environmental prestarts and toolboxes also used to promote awareness of site environmental requirements. Non-conformance process is tool used to enforce compliance. | Subcontracts and verified through tender clarification process. Site personell are inducted and the Site Specific Induction includes environmental requirements. Toolboxes and prestarts also used to communicate | Compliant Opportunity for Improvement | The Contractor may consider reviewing and amending the site induction to ensure it includes reference to relevant requirements of Development Consent (e.g. rock hammering hours, obligation to minimise harm to the environment) and environmental legislation (e.g. POEO Act). |
| DC-A12 | Community Consultation | Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document for information or 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 | Pre-construction and During Construction | Principal | Root Partnerships Consultation Report, Penshurst Public School Upgrade Rev 2 (13/4/19). | | Compliant | |
| DC-B1 | Notification | The Department must be notified in writing of the dates of commencement of physical work and operation at least 48 hours before those dates. If the construction or operation of the development is to be staged, the Department must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage. | Pre-construction | Contractor | Sighted email from Contracts Administrator to Root Partnerships on 14/2/19, with attached draft letter dated 18/2/19, for commencement of works on 4/3/19. | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|-----------|--|----------------------|----------------|---|------------------------------|-------------------|----------------|
| DC-B4 | | Before the commencement of construction, the Applicant must: (a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (c) submit a copy of the dilapidation report in the Certifying Authority and Council. | Pre-construction | Contractor | Dilapidation Report completed by Webber Design Pty Ltd, includes roads, private school, church, adjacent residences, council assets and public infrastruture. Grindley Submitted to Council & Certifier 21/03/19. | | Compliant | |
| DC-B13 | Community | A community Communication Strategy must be prepared to provide mechanisms to facilitate communication between the Applicant, Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction. The Community Communication Strategy must: (a) identify people to be consulted during the design and construction phases; (b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; (c) provide for the formation of accessible information about or required, that focus on key environmental management issues for the development; (i) set out procedures and mechanisms; (i) through which the community can discuss or provide feedback to the Applicant; (ii) through which the Applicant will respond to enquiries or feedback from the community; and (iiii) 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. The Community Communication Strategy must be submitted to the Planning Secretary for approval no later than two weeks before the commence until the Community Communication Strategy has been approved by the Planning Secretary, or within another timeframe agreed with the Planning Secretary. | Pre-construction | Principal | Penshurst Public School Project Community Consultation Strategy (April 2019) available on SINSW PPS website. Submitted by SINSW to DPE 20.03.19. In the Response to Draft Independent Audit Report Root Partnerships comment: Email from Jane Hagan (Previous SINSW PD) confirmed it was issued to DPE on 14/03/19 via email. | | Compliant | |
| DC-B14 | | Prior to the commencement of construction, the Applicant must register for a minimum 4 star Green Star rating with the Green Building Council Australia, unless otherwise agreed by the Planning Secretary and submit evidence of registration to the Certifying Authority. | Pre-construction | Contractor | Registration with Green Building Council of Australia submitted to PCA (1/4/19). | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|--------|--|----------------------|----------------|--|---|-------------------|----------------|
| DC-B17 | | 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: (a) Details of: (i) hours of work; (ii) 24-hour contact details of site manager; (iii) management of dust and odour to protect the amenity of the neighbourhood; (iv) stormwater control and discharge; (v) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; (vi) groundwater management plan including measures to prevent groundwater contamination; (vii) external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting; (viii) community consultation and complaints handling; (b) Construction Traffic and Pedestrian Management Sub-Plan (see condition B19); (c) Construction Noise and Vibration Management Sub-Plan (see condition B20); (d) construction Waste Management Sub-Plan (see condition B20); (f) a unexpected finds protocol for Aboriginal and no-Aboriginal heritage and associated communications procedure; (g) an unexpected finds protocol for Aboriginal and no-Aboriginal heritage and associated communications procedure; and (h) waste classification (for materials to remain) be undertaken to confirm the contamination status in these areas of the site. | Pre-construction | Contractor | Grindley prepared CEMP to meet all requirements of B17 (a) - (h). Submitted to SINSW and Principal Certifying Authority (PCA) 22.03.19. The plan includes construction hours, emergency contacts, neihbourhood notification, stormwater management, noise and dust management. No groundwater management ior handling of complaints included in the plan. The site team advised no amendments were required by the Principal. | | Compliant | |
| DC-B18 | | The Applicant must not commence construction of the development until the CEMP is approved by the Certifying Authority and a copy submitted to the Planning Secretary. | Pre-construction | Contractor | Sighted Crown Building Certificate for Penshurst Public School dated 2/4/19 Ref: GDL 160498 by Principle Certifier Authority, Group DLA. Deemed approved through Crown Building Certificate for Penshurst Public School dated 2/4/19 Ref: GDL 16048 by PCA. | CEMP deemed approved through Crown Building Certificate for Penshurst Public School dated 2/4/19 Ref: GDL 16048 by PCA. | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|--|--|----------------------|----------------|--|------------------------------|-------------------|----------------|
| DC-B19 | Management Plans, Traffic | The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council and RMS; (c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; (d) detail heavy vehicle routes, access and parking arrangements; (e) include a Driver Code of Conduct to: (i) minimise the impacts of earthworks and construction on the local and regional road network; (ii) minimise conflicts with other road users; (f) include a program to monitor the effectiveness of these measures; and (g) f necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes. | Pre-construction | | Grindley Traffic Management Plan dated 21/3/19, prepared by Lack Group. Submitted as part of CEMP to SINSW and PCA 22.03.19. | | Compliant | |
| DC-B20 | Contractor adopted acoustic assessment report. Includes construction noise and assessment criteria, construction hours, rock hammering hours. | The Construction Noise and Vibration Management Sub-Plan 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 noisegenerating works; (e) describe the community consultation undertaken to develop the strategies in condition B20(d); and (f) include a complaints management system that would be implemented for the duration of the construction. | | Contractor | Day Design Acoustic Assessment Report Rev C (3/4/2018) adopted by Grindley. Includes construction noise and assessment criteria, construction hours, rock hammering hours. Submitted as part of CEMP to SINSW and PCA 22.03.19. | | Compliant | |
| DC-B21 | Management Plans, Waste | 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, 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. | Pre-construction | Contractor | Root Partnerships Waste Management Plan Rev 3 (2/2/18) adopted by Grindley. Submitted as part of CEMP to SINSW and PCA 22.03.19. Rev 3 of Contractor CEMP section 4.7.7 of also includes Waste Management Plan, with quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations. | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|--------------------------|--|----------------------|----------------|---|--|-------------------|---|
| DC-822 | Management Plans, ESC | The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction; (c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (d) detail all off-Site flows from the Site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI). | | Contractor | Contractor adopted Erosion and Sediment Control Plan Drawings prepared by Perumal Pedavoli, and updated to include details of stormwater and flood flows for ARI events (CIV-CD-01-008 Rev 1). Email from Woolacotts to Grindley dated 26/3/19 confirming plan prepared by Registered Member of Engineers Australia. CSWMSP submitted to Council 27.03.19. Email from Council dated 1/4/19 approving ESCP. Plan includes ESC to be implemented during construction, measures to manage stormwater and flood flows of different ARI events. Does not include wet weather plan (e.g. site stabilisation, temporary drainage controls, storage of equipment). | ESC Plan approved by Council and meets majority of requirements of Development Consent. Does not include wet weather plan, as required by sub- section (c). | Non-compliant | Amend ESC Plan to include how all construction works will be managed in a wet-weather events (e.g. storage of equipment, stabilisation of the Site), temporary drainage controls to direct runoff to sediment basin, responsibility for wet weather preparation checklist). |
| DC-B23 | Construction Parking | The Applicant must provide sufficient construction vehicle parking facilities on-site, including for heavy vehicles and workers, to ensure that construction traffic associated with the development does not utilise on-street parking or public parking facilities | Pre-construction | Contractor | No construction vehicles sighted in street during site inspections (other than worker cars). Site Induction includes recommendation to use public transport to avoid the need for street parking. | | Compliant | |
| DC-B26 | Waste | 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. | Pre-construction | Principal | Email from Mitchell to Gulshan Chandani on 25/3/19 to notify of proposed truck routes. | | Compliant | |
| DC-833 | Cultural Heritage | Prior to the commencement of demolition works on-site, a photographic archival record of the external and internal areas of buildings and structures to be demolished must be prepared in accordance with the recommendations in the report titled Statement of Heritage Impact, Penshurst Public School, prepared by Perumal Murphy Alessi and dated January 2018 and supplementary advice prepared by Perumal Murphy Alessi and dated September 2018; and the NSW Heritage Branch guidelines titled Photographic Recording of Heritage Items using Film or Digital Capture. A hardcopy and digital copy must be submitted to Council, the Heritage Division and the Planning Secretary prior to demolition works commencing. | | Contractor | Contractor submitted to Council 13/3/19. | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|----------|--------------------|---|----------------------|----------------|--|------------------------------|-------------------|----------------|
| DC-A5/A6 | Tree Protection | The proposed Chinese Tallowood Arcadia Street trees must be replaced with either Fiddlewood, Jacaranda or Pear Tree to minimise potential off-site environmental impacts to existing nature revegetation areas. Details demonstrating compliance must be provided to the satisfaction of the certifying authority prior to the commencement of building works. | Pre-building works | Contractor | | | Not triggered | |
| | | The Remediation Action Plan, titled Preliminary Stage 2 Site Investigation and Remediation Action Plan, prepared by Environmental Investigation Services and dated 25 September 2018, must be updated to reflect the findings of the additional site investigations required by condition B8. 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 remediation works. | | | Project Manager explained that Data Gap Investigation (DGI) and completion of the RAP. EIS undertook the original RAP. Once demolition completed, works stopped, additional soil testing completed, RAP completed. Earth works did not recommence until RAP completed and approved by auditor. Submitted to PCA (Group DLA) prior to works recommencing. Reviewed auditors approval of final RAP: Interim Audit Advice #4, dated 9 July, from Melissa Porter of Senversa. Sighted email to Nick Itchison and Brett Clabburn on with Data Gap Investigaiton and Updated RAP, Auditors Statement (see above) and Asbestos Works Management Plan. | | Compliant | |
| DC-B6 | Site Contamination | Update Remediation Action Plan to reflect findings of additional site investigations conducted for condition B5 | Pre-building works | Contractor | Email confirmation from Group DLA dated 10/07/19. | | Compliant | |
| DC-B7 | Asbestos | Prior to the commencement of remediation works, an asbestos works management plan must be prepared and submitted for review by a NSW EPA accredited Site Auditor. The asbestos works management plan must be implemented following the receipt of confirmation from the NSW EPA accredited Site Auditor that the asbestos works management plan is considered appropriate. | Pre-building works | Contractor | Submitted as part of CC2. Email from Grindley to Group DLA: Penshurst PS - CC2 (6/6/19) | | Compliant | |
| DC-B8 | Site Contamination | Remediation works approved as part of this development consent must be carried out in accordance with the report titled, as required to be updated by condition B9, Preliminary Stage 2 Site Investigation and Remediation Action Plan, prepared by Environmental Investigation Services and dated 25 September 2018. | Pre-building works | Contractor | Site Manager explained that there have been several iterations of the plan, to make plan work from a practical perspective. Areas broken ip into zones. Asbestos / GSW. GSW was to be removed. Works are to be done in accordance with Asbestos Removal Control Plan. EIS produce an Abestos Works Management Plan, Abestos Removal Control Plan (ARCP - subbie plan). The hygenist will be onsite at all times when asbestos work being done. Chaloui has asbestos removalist. Site Manager also has asbestos license. Steve and their supervisor also monitor works in general. Clearance Certificates are issued by the hygensit when abestos works in a zone are complete. 15 grids / zones. 3 grids being emu picked. 4 grids is asbestos removal works. 6 grids visual assessment works. Plan communicated on notice board onsite (see photos). | | Compliant | |
| DC-B9 | Site Contamination | Upon completion of remedial works, the Applicant must submit a Site Audit Report and Section A Site Audit Statement for the relevant part of the site prepared by a NSW EPA accredited Site Auditor. The Site Audit Report and Section A Site Audit Statement must verify the relevant part of the site is suitable for the hospital land use and be provided to the satisfaction of the Certifying Authority. | Pre-building works | Contractor | | | Not triggered | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|---------------------------|---|----------------------|----------------|---|------------------------------|-------------------|----------------|
| DC-B10 | Site Contamination | Prepare unexpected contamination procedure and incorporate within the Construction Environmental Management Plan in accordance with condition B17 Any material identified as contaminated must be disposed off site, submission to Planning Secretary of disposal location and results of testing prior to removal from site | Pre-building works | Contractor | Unexpected finds procedure is included in the site induction and on the notice board (see photo). | | Compliant | |
| DC-B11 | Utilities and Services | Obtain relevant approvals from service providers for any utility works | Pre-building works | Contractor | Project Manager advised not triggered. | | Not triggered. | |
| DC-B12 | Utilities and Services | Obtain written advice from electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) confirming the adequate provision of services | Pre-building works | Contractor | Submitted as part of CC2. Email from Grindley to Group DLA: Penshurst PS - CC2 (6/6/19) AusGrid letter dated 15.02.19 New development application submitted to NBN. | | Compliant | |
| DC-B15 | Outdoor Lighting | Submission of compliance to AS 1158.3.1 2005 to Certifying Authority, compliance to their satisfaction | Pre-building works | Contractor | Submitted as part of CC2. Email from Grindley to Group DLA: Penshurst PS - CC2 (6/6/19) | | Compliant | |
| DC-B16 | Accessibility | Submission of compliance to the BCA in regards to access and facilities for people with disabilities to Certifying Authority, compliance to their satisfaction | Pre-building works | Contractor | Submitted as part of CC2. Email from Grindley to Group DLA: Penshurst PS - CC2 (6/6/19) | | Compliant | |
| DC-B24 | Stormwater Management | Submission of designed stormwater management system to Certifying Authority, design to their satisfaction | Pre-building works | Contractor | Submitted as part of CC2. Email from Grindley to Group DLA: Penshurst PS - CC2 (6/6/19) | | Compliant | |
| DC-825 | Noise | Prior to commencement of building works, the Applicant must incorporate the noise mitigation recommendations in the report titled Acoustic Assessment Report, Penshurst Public School Arcadia Street, Penshurst, Report No. 6320-1.1R Rev E, prepared by Day Design Pty Ltd and dated 11 October 2018, into the detailed design drawings. The Certifying Authority must verify that all reasonable and feasible noise mitigation measures have been incorporated into the design to ensure the development will not exceed the project noise trigger levels established based on the more conservative Rating Background Noise levels identified in the report titled Acoustic Assessment Report, Penshurst Public School Arcadia Street, Penshurst, Report No. 6320-1.1 R Rev E, prepared by Day Design Pty Ltd and dated 11 October 2018. | Pre-building works | Contractor | Reviewed letter from Perumal Pedavoli Archeitects on 3 June 2019, verifying that design incorprates mitigation measures required by the Day Design Acoustic Assessment Report Revsilon E dated 11 October 2018. Submitted as part of CC2. | | Compliant | |
| DC-B27 | Waste | Obtain agreement from Council for the design of the operational waste storage area where waste removal is undertaken by Council | Pre-building works | Principal | Site Manager advised no waste removal by Council during construction. Root Partnerships advised school principal confirmed in his attached email that they will be using private waste contractors not the council. | | Compliant | |
| DC-B29 | Rainwater Harvesting | Rainwater reuse/harvesting system developed for site prepared and certified by an experienced hydraulic engineer | Pre-building works | Contractor | Rainwater re-use plan certified by qualified hydrualic engineer 10/5/19 | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|-------------------|--|----------------------|----------------|---|------------------------------|-------------------|----------------|
| DC-836 | Cultural Heritage | Under the guidance of a suitably qualified heritage consultant, significant and original heritage fabric including but not limited to timber floors, windows, doors, brickwork and any other notable features is to be salvaged and reused during the construction phase for buildings and landscaping purposes. Where reuse is not possible on site, these items must be stored in perpetuity on site or donated to a reputable recycling facility or centre specialising in building materials. | Pre-building works | Contractor | Reviewed Statement of Heritage Impact, Perumal Murphy Alessi (January 2018). Page 7 of the report recommends that potential heritage impact can be offset by incorprating bricks and details from the 1925 buildings on the site. Reviewed archeitect drawing specifiying that bike rack retaining wall to be lined with reclaimed bricks. Project Manager advised that retention of bricks included in SOI and addressed in SSD17 Reponse to submissions Heritage, and that other materials salvaged (e.g. air con, fire equipment, water tanks) salvaged for re-use where practicable. Sighted salvaged bricks (see photo). Signage was installed during audit, to ensure bricks are retained. | | Compliant | |
| DC-B37 | Landscaping | Prior to the commencement of building works, the Applicant must prepare a Landscape Management Plan to manage the approved landscaping works on-site, to the satisfaction of the Certifying Authority. The plan must: (a) be generally in accordance with the approved landscape plan outlined in condition A2 prepared by Lorna Harrison Landscape Architects and amended as required by condition A5; (b) ensure that no more than 30 trees are removed from the site and identifies all other existing trees to be retained; (c) detail the species to be planted on-site, including the seven advanced Lophostemonconfertus screen tree plantings, a minimum 400L in pot size along the northern boundary; (d) describe the monitoring and maintenance measures to manage revegetation and landscaping works; (e) be consistent with the Applicant's Management and Mitigation Measures in the EIS; (f) provide for the planting of trees and vegetation to soften the visual impact of the approval built form from the public domain and provide shade; (g) include details to ensure native trees removed from the site are salvaged (eg tree trunks greater than 25-30cm in diameter and 3m in length) and used to enhance habitat on site; and (h) include details of nest boxes suitable for native fauna likely to utilise the site such as birds, bats and arboreal fauna (i) (betail where on the site, salvaged and reused heritage fabric has been used. | Pre-building works | Contractor | Landscape Management Plan prepared by Lorna Harrison Landscape Architects SSDA8365 (23/2/19) submitted as part of CC2. In the Response to Draft Independent Audit Report Root Partnerships advised that this was deemed approved by way of issuing CC2. | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|-----------------|---|--|------------------------|----------------|---|---|-------------------|----------------|
| EMP-10A | Management Plans | The Project Manager and his nominees shall review weekly the effectiveness of the Project EMS system and will consider project safety and environmental issues | During construction | Contractor | 3 revisions to date (26/2/19, 12/6/19 & post audit). | | Compliant | |
| EMP-10B | Management Plans | Preparation and updating of project environmental programs /procedures, and monitoring of progress will be undertaken as required, e.g. by client, latent environmental conditions or considerations. | During construction | Contractor | 3 revisions to date (26/2/19, 12/6/19 & post audit). | | Compliant | |
| EMP-10C | Incidents and Non- conformances | Non-conformance and incidents (including corrective and preventative actions) to be managed in accordance with the Grindley Construction Environmental Management Manual | During construction | Contractor | Reviewed Grindley Environmental Mangement Manual. | | Compliant | |
| EMP-13A | Incidents and Non- conformances | The Project Manager will review all incident/non-conformance records, accident & incident reports and audit reports | During construction | Contractor | Interview with Site Team: Contracts Administrator sends Non-conformances to Site Manager to review prior to sending to Subcontractor. There have been two Grindley EMS Subcontractor non-conformances on the project. Non-conformances are closed out by Site Manager. Project Manager reviews prior to closing out. Sighted evidence of PM being copied into email to Subcontractor. | | Compliant | |
| EMP-10D /ERP | Environmental Protection Measures | Environmental protection apparatus will be installed ready for use in case of emergency. For environmental spill to: • Contain the spill and control its flow • Block storm water drains downstream of the spill • Clean up the spill To manage failure of ESC Controls to: • Contain/minimise the flo. For discovery of items of conservation value or contaminated value to: • Fence off the area as "no go" zone For rupture of pipelines to: • Block storm water drains downstream of the spill | During construction | Contractor | Sighted spill kits, sandbags (to contain spills and block drains) and no go zones (for tree protection) during site inspection (refer to site photographs). | | Compliant | |
| EMP-10E | Training and awareness | The project management team are responsible for Environmental Inductions | During construction | Contractor | Site specific inductions are completed online. Includes 3 questions. Reviewed induction register in Hammertech. Sighted records of Site Manager and Project Manager inductions. | | Compliant | |
| EMP-10F | Leadership | The project management team are responsible for HSE Meetings | During construction | Contractor | Interview with Site Management Team: At present only one Subcontractor onsite and no Safety Comittee formed, so meetings are informal, Toolbox Talks and Daily Prestarts are main forum for discussing environmental risks. Reviewed GC21 Monthly Meeting Agenda. Agenda Item 1: HSEQ. Reviewed meeting minues 12/7/2019. Nil HSEQ comments for that day. Project Manager advised that no environmental issues have been raised to date in these meetings. There is a fortnightly Site Meeting with a similar agenda. | At present there is only one Subcontractor onsite and informal meetings / toolbox talks are adequate to address risk. | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|---------|------------------------------|---|------------------------|----------------|---|--|---|---|
| EMP-10H | Waste | Monitoring adherence to Waste Management Plans (Operational as per Head Contract) | During construction | Contractor | Reviewed Grindley Weekly Environmental Inspections 17/4/19, 29/7/19. Includes inspection of waste management: Items 1.4 Waste Management Plan /Impact Mitigation Plan is available? 1.6 Storage area clean and tidy, 3.12 Waste being removed effectively, 3.13 Hazardous materials being removed in accordance with local EPA. Site Manager does weekly environmental inspections. WHSEQ Managers visit monthly and Complete WHSEQ Monthly Project Inspection. Reviewed checklist completed by Jeff Leys, dated 25/7/19. Same criteria as weekly checklist. There have been no observations, corrective actions or comments logged in inspections which demonstrate good waste management practices or evidence monitoring. Discussion with Site Team in relation to 'tick and flick' approach to inspections to demonstrate monitoring of waste management and other requirements. | Inspections include items relating to waste management, but no observaions, comments, corrective actions and photographs have been included in inspections to evidence monitoring or demonstrate good waste management. | Compliant Opportunity for Improvement | The Contractor may consider reviewing the Environmental Inspection Forms to include guidelines around adding photographs and observations to evidence that onsite monitoring of environmental practices has occurred, and to demonstrate environmental compliance. Training and awareness in environmental due diligence and duty of care may also be of benefit. |
| EMP-10I | Monthly Report | Monthly Reporting | During construction | Contractor | | Reviewed Monthly Report No. 6 July 2019 provided to SINSW, including key environemental statistics (no. of audits, inspections, corrective actions, incidents, epa visits, EPA improvement notices / fines). | Compliant | |
| EMP-11A | Environmental Inspections | Environmental Inspections: • Weekly Environmental Inspections and Inclement Weather Inspections conducted by Environmental Officer (p14) • Monthly Inspection to be undertaken by WHSEQ Manager | During construction | Contractor | Weekly Inspections undertaken by Site Manager (Steve). Sighted inspections by Site Manager on 17/4/19, 7/5/19, 16/5/19, 31/5/19, 21/6/19, 28/6/19, 22/7/19, 29/7/19. Sampled and reviewed the following inspections: 29/7/19: all items passed / Na. No comments, obervations or photos. 22/7/19: corrective action issued #30: Sediment pond not as per design. Rework was required to ensure costructed in accordance with blue book. Work in progress during audit. The Contractor does not have an Inclement Weather or Wet Weather Preparation Inspection Form. | Weekly Inspections are complete, but minimal observaions, comments, corrective actions and photographs have been included in inspections to evidence monitoring or demonstrate complianc and good environmental management practices. | Compliant Opportunity for Improvement | The Contractor may consider reviewing the Environmental Inspection Forms to include guidelines around adding photographs and observations to evidence that onsite monitoring of environmental practices has occurred, and to demonstrate environmental compliance. Training and awareness in environmental due diligence and duty of care may also be of benefit. |
| EMP-11B | Project | Internal Audits to be conducted 6 monthly and distributed to Management Team and Project Management Review Meeting | During construction | Contractor | Discussion with WHSEQ Manager. No internal audit conducted to date. Reviewed 2019 Audit Schedule, which includes audit schedule for all projects. It is anticipated that an Internal Audit will be scheduled in August. | Internal Audit to be completed in August. | Compliant | |
| EMP-2 | | The EMP will be reviewed and updated as required and as a minimum at signifiant stages of the project where applicable such as commencement on site, completion of earthworks, completion of structure, completion of fit out and or at least 6 monthly to reflect changes occuring to the project. | | Contractor | 3 reviews to date | | Compliant | |
| EMP-12A | | Site Sign will be erected giving contact details of the site manager to be contacted for any concerns/queries regarding the construction works. | | Contractor | See photograph | | Compliant | |
| EMP-12B | Community Consultation | Letters will be issued to all immediate neighbours also with Grindley contact details as well as an indicative start and duration of construction activities (If required). | During construction | Contractor | Sighted email from Contracts Administrator to Root Partnerships on 14/2/19, with attached draft letter dated 18/2/19, for commencement of works on 4/3/19. Principal is repsonsible for completing notification under Contract. | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|---------|-------------------------------------|--|------------------------|----------------|---|---|---|---|
| EMP-13B | Subcontractor Management | The Project Manager will establish an administrative system to monitor the subcontracts and the payment of subcontractors in relation to their environmental responsibilities. | During construction | Contractor | Reviewed the standard grindley subcontract. Under the contract the Builder is not obliged to pay unless the contractor has provided QA documents under the contract. Mithcell asserts that this includes that for Chaloiu this includes the Environmental Inspection Checklist. Non-conformances are another tool used to monitor subcontract performance. Excessive dust has shut down site Sed basin - not to spec - could have held payment. Reviewe Under waste contract item Reviewed 3.10 recycling and waste reports shall be reported monthly | | Compliant | |
| EMP-13C | Waste | The Contracts Administrator will ensure that dockets required by EPA guidelines for waste and spoil removal are present before invoices are processed | During construction | Contractor | Reviewed Chalouhi invoice for partial GSW and asbestos removal works zones 3 & 10. Sighted delivery dockets and waste tracking forms from Cleanaway attached to the invoice. Variation GCPPS-VAR-008. Reviewed docket schedule, totalling asbestos removal volumes, for removal of GSWA (GSWAsbestos) 22/7/19 - 23/7/19. Rodney advised that this is compiled for all invoices prior to payment. Recycling and disposal locations are provided in the truck run sheet in. Sighted in ITP-001 (in drop box folder) page 157. | | Compliant | |
| EMP-13D | Waste | The Contracts Administrator will ensure that waste removal contractors provide monthly reports of waste removed from sites | During construction | Contractor | No monthly waste reports provided by Contractor as yet. Only have truck run sheets for demo waste (contained in ITP above). ITP also contains asbestos waste and GSWA dockets (in drop box). Have requested waste report from Sharoiu. Demo was in May / June. Waste Reports were provided prior to audit closing meeting. | | Compliant | |
| EMP-18A | Air Quality | Air Quality and Dust Management to be managed by Site Manager as per Impact Mitigation Plan 006 (IMP006) | During construction | Contractor | Reviewed Impact Mitigation Plan 006 (IMP006). Requires use of watercar/hose to wet down the site / stockpiles, roads, earthworks, loading trucks, concrete cutting or crushing as required to minimise dust. Water cannon onsite (see photo). Site Manager advised Subcontractor water trucks are on call, available as required. Subcontractor site inspections show photos of water cart in operation. ring main (water line runs around, every 30 metres has a tap). During the shut down period for RAP Site Manager set up irrigation grid (see photo). Contractor Environmental Inspections include dust monitoring. | | Compliant | |
| EMP-18B | Air Quality | Dust minimisation techniques to be employed as needed during construction, including the use of water carts as necessary | During construction | Contractor | Reviewed impact Mitigation Plan O06 (IMPO06). Requires use of watercar/hose to wet down the site / stockpiles, roads, earthworks, loading trucks, concrete cutting or crushing as required to minimise dust. Water cannon onsite (see photo). Site Manager advised Subcontractor water trucks are on call, available as required. Subcontractor site inspections show photos of water cart in operation. ring main (water line runs around, every 30 metres has a tap). During the shut down period for RAP Site Manager set up irrigation grid (see photo). Contractor Environmental Inspections include dust monitoring. | | Compliant | |
| EMP-18C | Air Quality, Plant and equipment | Proper maintenance of all machinery on site as per plant maintenance declaration form (form 129) | During construction | Contractor | Form 129 unknown to team. WHSEQ Manager advised has been replaced by Plant and Equipment Maintenance Checklist. Sighted plant inspection folder, including Plant and Equipment Maintenance Checklist for pad foot roller dated (undated) (see photo). Data entered into Plant and equipent maintenance regiser Form 130 (see photo). | The EMP contains reference to redundant Form 129. | Compliant Opportunity for Improvement | The Contractor may consider reviewing the CEMP to ensure references to system documents are up to date. |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|------------------|------------------------|---|------------------------|----------------|--|--|---|---|
| EMP-19A | Incident Management | Any project spills, discovery of contaminated material and cultural heritage finds to be managed in accordance with the Emergency Response Plan Section 4.1 of Project EMP | During construction | Contractor | Reviewed Section 4.1 of EMP Emergency Response Plan.Adequate. Site Manager advised Emergency Response Plan has not been activated. | | Compliant | |
| EMP-19B | Flora and Fauna | Flora and Fauna on the site will be managed through the recommendations of the Flora and Fauna conditions detailed in the DA approval | During construction | Contractor | Tree protection zone fenced off and signed (see photo). Possum observed onsite during demolition was monitored, ran up tree (see photo). No flora / fauna conditions in Development Consent. | | Compliant | |
| | | In the case of discovery of flora / fauna fence off the area as "no go" zone and contact the Site Manager or Project manager immediately for further action. | | | | | | |
| EMP-19C | Noise | Construction noise management will be in accordance with the Development Application | During construction | Contractor | Refer to DC-C7 and DC-C14. | | Compliant | |
| EMP-19D | Waste | Waste Management will be conducted in accordance with Impact Mitigation Plan 004 (IMP004) (refer to Appendix B) and Operational Waste Management Plan. | | Contractor | Reviewed Impact Mitigation Plan 004 (IMP004). Requires Site Manager Weekly Environmental Inspection, Sorting of waste, re-using materials where possible (e.g. timber, soil), recycling material where possible (e.g. steel, copper, bricks), using bin contractors with waste separation, and monthly waste recycle reports from bin contractor. These requirements are not included as items in the Contractor or Subcontractor Weekly Environmental Inpsections. Good waste segregation observed during the site inspections, and high recycling rates observed in the Monthly Waste Reports. | There is evidence of compliance, but the requirements are not being monitored as part of weekly site insepctions | Compliant Opportunity for Improvement | The Contractor may consider reviewing the Environmental Inspection Forms to include monitoring of the waste mangement requirements specified in the Impact Mitigation Plan 004. |
| EMP-20A | ESC | Sediment and erosion control will be as per the sediment and erosion control plan prepared in accordance with the 'Blue Book'. | 1 0 | Contractor | Erosion and Sediment Control Plan CIV-CD-01-008 Rev 1. ESC controls are installed in accordance with the plan (see photos). Survey of sediment basin to be undertaken once completed, to ensure design capacity is met. | | Compliant | |
| EMP-20B | ESC | Unnecessary disturbance of the site shall not occur | During construction | Contractor | No disturbance outside site boundary or in protected areas (see photos). | | Compliant | |
| EMP-ESC- P20C | ESC | All cuts are to be stabilised as soon as possible after the completion of site earthworks | During construction | Contractor | | | Not triggered | |
| EMP-ESC- P20D | ESC | Extra care will be taken to prevent sediment run off into all neighbouring lots and stormwater | During construction | Contractor | ESC Controls, stabilised vehicle access, site vehicle washdown (see photos). | | Compliant | |
| EMP-ESC- P20E | ESC | Any collected silt will be disposed of in accordance with all other relevant codes and standards. | During construction | Contractor | Site Manager advised no sediment disposed of offsite to date. Would be disposed of in skip bin once earthworks complete. | | Compliant | |
| EMP-20F | ESC | Silt fences are to be installed to all site boundaries as follows: • Geotextile fabric will be fixed to the temporary construction fencing to the 'downhill' boundaries of the site. • The fabric will be turned down under the existing ground line and secured at regular intervals not exceeding 3m in accordance with the diagram on page 20 of the EMP | During construction | Contractor | Sediment fence trenched in and secured at regular intervals (see photos). | | Compliant | |
| EMP-21A | ESC | Vehicular access will be controlled to prevent sediment being tracked. This will be done by maintaining an all weather access/driveway composed of an approved course aggregate surface. Also if the need arises a shaker grid will be installed to the main access by Grindley Construction during the construction works. | During construction | Contractor | Stabilised vehicle access and site vehicle washdown observed (see photos). | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|----------|--|---|------------------------|----------------|--|------------------------------|-------------------|----------------|
| EMP-21B | ESC | Any sediment that is tracked onto the surrounding roads will be cleaned off in a timely manner | During construction | Contractor | Site Manager advised Subcontractor street sweeper cleans the street a required. Photo evidence provided in Subcontractor Environmetnal Inspection 21/5/19 (see photo). | | Compliant | |
| EMP-21C | ESC | All stormwater inlets are to be covered with geotextile fabric in a roll or other format to ensure that no sediment enters into the stormwater system. This will be the responsibility of the Site Manager to enforce. The rolls will not only be placed directly at the inlets as shown below, they will also be placed at regular intervals in the gutters 'upstream' from the inlets creating multiple barriers. | During construction | Contractor | Stormwater inlets inspected onsite (see photos). Subcontractor Environmental Inspections show stormwater inlets being covered (e.g. 24/4/19). | | Compliant | |
| EMP-21D | ESC Stockpile Management | If appropriate topsoil is to be stockpiled on site then the following measures will be put in place. If stockpiling is required, stockpiles shall be stored at least 2 meters clear of drainage lines, natural watercourse and established trees. | During construction | Contractor | Stockpiles outside drip line of tress and natural drainage lines (see photos). | | Compliant | |
| EMP-22E | ESC Stockpile Management | Stockpiles will have temporary silt fences in place around the stockpiles to create an enclosure and if necessary they will be covered will shade cloth or tarpaulin to retain the materials on the stock pile. The location of stock piles will be determined on site. | During construction | Contractor | Stockpiles shaped and stabilised adjacent to perimeter sediment fence (see photos). Site Manager advised if stockpiles are to be kept in place for a long period they can be covered in geofab, but generally materials is only stockpiled for short periods. Stockpiles are battered and watered as required. Cannon onsite to be used as required. Generally material is directly loaded out, but stockpiles are in place due to RAP changes. Asbestos stockpiles are covered in geofab (see photos). | | Compliant | |
| EMP-P21D | Waste | Dedicated building waste enclosures will be set up around the site to enclose building waste where required. No waste enclosures will be set up outside of the site boundary. | During construction | Contractor | All waste bins contained within site (see site photos). | | Compliant | |
| EMP-P22A | Air Quality | Shade cloth to the boundary fences will be maintained throughout all stage of construction to assist in dust control | During construction | Contractor | Shade cloth installed around boundary. Dust and privacy screen installed for adjacent resident (see photos). | | Compliant | |
| EMP-22B | Air Quality | If excessive dust being created, the site will be watered down by a water truck where possible, and/or sprinklers and hose. | During construction | Contractor | Site Manager advised Subcontractor water trucks are on call, available as required. Subcontractor site inspections show photos of water cart in operation. ring main (water line runs around, every 30 metres has a tap). During the shut down period for RAP Site Manager set up irrigation grid (see photo). Contractor Environmental Inspections include dust monitoring. | | Compliant | |
| EMP-22B | Air Quality Stockpile Management | All stockpiled soils will be covered during periods of high wind to reduce the dust created from on site storage. | During construction | Contractor | Stockpiles shaped and stabilised (see photos). Site Manager advised if stockpiles are to be kept in place for a long period they can be covered in geofab, but generally materials is only stockpiled for short periods. Stockpiles are battered and watered as required. Cannon onsite to be used as required. Generally material is directly loaded out, but stockpiles are in place due to RAP changes. Asbestos stockpiles are covered in geofab (see photos). | | Compliant | |
| EMP-22C | ESC Site Inspections | In order to maintain the various erosion and sediment control devices, regular inspections, repairs and cleaning will be carried out on the silt fences to the boundaries, stockpiles, waste enclosures, and to the stockpile covers, in accordance with Section 2.4 of Project EMP | During construction | Contractor | Contractor and Subcontractor Weekly Environmental Inspections reviewed. Thorough inspection of ESC. Subcontractor inspections include photographs and evidence of ESC maintenance. | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status Recommendation |
|-------|----------------------------------|--|------------------------|----------------|--|------------------------------|----------------------------------|
| DC-C1 | Management Plan Accessibility | A copy of the approved and certified plans, specifications and documents incorporating conditions of approval and certification must be kept on the Site at all times and must be readily available for perusal by any officer of the Department, Council or the Certifying Authority. | During construction | Contractor | Hard copy drawings observed onsite. Certified plans, specifications, documents incorporating conditions of approval and certification readily available in Procore. | | Compliant |
| DC-C2 | Site Sign | A site notice(s): (a) must be prominently displayed at the boundaries of the site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifying Authority and Structural Engineer. (b) is to satisfy all but not be limited to, the following requirements: (i) minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size; (ii) the notice is to be durable and weatherproof and is to be displayed throughout the works period; (iii) the approved hours of work, the name of the site. project manager, the responsible managing company (if any), its address and 24- hour contact phone number for any inquiries, including construction. noise complaint must be displayed on the site notice; and (iv) the notice(s) is to be mounted at eye level on the perimeter hoardings.fencing and is to state that unauthorised entry to the site is not permitted. | During construction | Contractor | Site sign at front gate (see photo) | | Compliant |
| DC-C3 | | 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. | During construction | Contractor | Sighted plant inspection folder. Reviewed Plant and Equipment Maintenance Checklist for pad foot roller dated (undated) (see photo). Data entered into Plant and equipent mainenance regiser Form 130 (see photo). | | Compliant |
| DC-C4 | Demolition Works | Demolition work must comply with Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifying Authority before the commencement of works. | During construction | Contractor | Submitted as part of CC1 | | Compliant |
| DC-C5 | Construction Hours | Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 6pm, Mondays to Fridays inclusive; and (b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays. | During construction | Contractor | Site is secured and locked outside hours (see photo). Delivery hours are included in site induction. Monitoring of working hours included in Contractor Weekly Inspection Form. | | Compliant |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|-------|--------|--|------------------------|----------------|---|------------------------------|-------------------|----------------|
| DC-C6 | | Activities may be undertaken outside of the hours in condition C6 if required: (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or (c) where the works are inaudible at the nearest sensitive receivers; or (d) where a variation is approved in advance in writing by the Planning Secretary or 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. | During construction | Contractor | Site Manager no works have been required to be undertaken outside hours. | | Compliant | |
| DC-C7 | | 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. | During construction | Contractor | Rock breaking hours are included in Site Induction. | | Compliant | |
| DC-C8 | | The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans). | During construction | Contractor | Site Manager Weekly Environmental Inspections, Project Manager Monthly Site Inspections, WHSEQ Manager Quarterly Inspections completed. No non- conformances with CEMP observed during site inspection. | | Compliant | |
| DC-C9 | | 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. | During construction | Contractor | No construction vehicles sighted in street during site inspections (other than worker cars). Site Induction includes recommendation to use public transport to avoid the need for street parking. | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|---------------------------|--|------------------------|----------------|--|--|---|---|
| DC-C10 | Road Occupancy Licence | If required Road Occupancy Licence (ROL) to be obtained from Transport Management Centre | During construction | Contractor | | | Not triggered | |
| DC-C11 | Site Security | Site to be adequately secured to prevent access by unauthorised personnel and work must be conducted in accordance with relevant SafeWork requirements | During construction | Contractor | Site adequately secured to prevent access - fenced with lockable gate and alarmed (see photo). | | Compliant | |
| DC-C12 | Hoarding | Third party advertising on hoarding/fencing not Permitted. Graffiti to be removed from construction hoardings or the like within 48 hours if required submission of hoarding application to Council | During construction | Contractor | No graffitti or third party advertising on Hoarding (see photos) | | Compliant | |
| DC-C13 | Public Way | Public way not to be obstructed by any materials, vehicles, refuse, skips of the like | During construction | Contractor | Public way not obstructed by any materials, vehicles, refuse, skips etc (see photo). | | Compliant | |
| DC-C14 | Noise | Execution of construction to achieve the construction noise management levels detailed in the Interim Construction Noise Guidelines (DECC 2009) | During construction | Contractor | Day Design Acoustic Assessment Report Rev C (3/4/2018) identifies rock hammering as activity, restricted hours set. | | Compliant | |
| | | Activities that could exceed levels to be identified and managed in accordance with approved Construction Noise and Vibration Management Plan | | | | | | |
| DC-C15 | Noise | Construction vehicles not to arrive at site or surrounding residential precincts outside of construction hours documented in condition C5. | During construction | Contractor | Site Induction includes working hours and recommendation to use public transport to avoid the need for street parking. | | Compliant | |
| DC-C16 | Noise | Audible movement alarms to be of a type that minimise noise impacts on surrounding noise sensitive receivers | During construction | Contractor | Site Manager advised that 'skwarkers' not approved for site. 'Squelchers' are required. This has not been communicated in the Plant and Equipment Checklist, Site Induction or CEMP. | Requirement has been complied with, but is not communicated in system documentation | Compliant Opportunity for Improvement | It is recommended that system documentation, e.g. the CEMP, Site Induction, Forms and Checklists, be reviewed to include audible alarm type requirements. |
| DC-C17 | Noise | 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. | During construction | Contractor | No evidence of complaints recieved. | | Compliant | |
| DC-C19 | Vibration | 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 C18. | During construction | Contractor | Site Manager quoted condition from developed consent - cant use vibratory rollers (pad foot / smooth drum) within 30 metres from adjoining buildings. Its not anticipated that will need to work within 30 metres. Adjoining areas are mainly cut material, with fill on other side of block. | | Compliant | |
| DC-C20 | Vibration | The limits in conditions C18 and C19 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B17 of this consent. | During construction | Contractor | | | Not triggered | |

| ID | Aspect | | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|-----------------|---|------------------------|----------------|---|------------------------------|-------------------|----------------|
| DC-C21 | Tree Protection | | During construction | Contractor | Reviewed Landscape Site Plan - Trees to be Retained / Removed. Drawing 555-LAN-CD-01. 1 street tree was removed near vehicle entry / carpark. Two trees on north-east edge of block. Protected tree to left of driveway is protected (see photo). Tree to right of driveway removed as part of design - tree removal plan. TPZ on southern side of block fenced and signage installed (see photo). | | Compliant | |
| DC-C22 | Air Quality | The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent. | During construction | Contractor | Stockpiles are battered and watered as required. Water cannon onsite to be used as required. Generally material is directly loaded out, but stockpiles are in place due to RAP changes. Asbestos stockpiles are covered in geofab (see photos). | | Compliant | |
| DC-C23 | Air Quality | During construction, the Applicant must ensure that: (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces. | During construction | Contractor | Stockpiles are battered and watered as required. Water cannon onsite to be used as required. Generally material is directly loaded out, but stockpiles are in place due to RAP changes. Asbestos stockpiles are covered in geofab (see photos). | | Compliant | |
| DC-C24 | Air Quality | The Applicant must install and operate | During construction | Contractor | Scaffold screen installed for neighbouring residence to mitigate dust. Agreed at project commencement. Variation issued to Grindley. Before activities. Dust monitor installed (see photo). | | Compliant | |
| DC-C25 | ESC | | During construction | Contractor | ESC installed as per ESC Plan (see photos) and inspection records demonstrate ongoing maintenance. | | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|--------------------|--|------------------------|----------------|---|---|--|--|
| DC-C26 | Site Contamination | 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.Certifying Authority] upon request. | During construction | Contractor | Site Manager advised that only fill required as part of scope of works is backfill material (sand / gravel). Will require a certificate. The methodology for how material is certified is still being developed. EIS will test material will be sampled and tested. | | Compliant | |
| DC-C27 | Site Contamination | 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. | During construction | Contractor | The Site Manager advised that there has been no water pumped from site to date. The Contractor plans to develop a dewatering permit to control and manage offsite pumping. | | Compliant Opportunity for improvement | It is recommended that system documentation, e.g. the CEMP, Site Induction, Forms and Checklists, be reviewed to include requirements for offsite pumping. |
| DC-C28 | Cultural Heritage | In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by OEH and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and OEH to develop and implement management strategies for all objects.sites. Works shall only recommence with the written approval of OEH. | During construction | Contractor | Included in induction. Aboriginal archeological assessment in procore. Read conclusion. | Requirements included in CEMP and Site Induction. No unexpected finds to date. | Compliant | |
| DC-C29 | Cultural Heritage | 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. | During construction | Contractor | Included in induction | Requirements included in CEMP and Site Induction. No unexpected finds to date. | Compliant | |
| DC-C30 | Waste | 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. | During construction | Contractor | Take photo | See photos | Compliant | |
| DC-C31 | Waste | All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014). | During construction | Contractor | | Contractor monthly reports | Compliant | |
| DC-C32 | Waste | 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. | During construction | Contractor | Discussion with Steve. All spoil trucks covered. Fineable offence. | Discussion with Steve. All spoil trucks covered. It is a fineable offence to have an uncovered truck. No uncovered trucks were observed leaving site during the site inspection. | Compliant | |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|---------------------------|---|------------------------|----------------|---|--|--|--|
| DC-C33 | Waste | The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural of artificial watercourse. | During construction | Contractor | No designated concrete washout pit onsite at time of inspections. Concrete washout observed onsite in unlined informal areas / from piles (see photos). | There was no designated concrete washout pit was in place at the time of the inspections and uncontrolled concrete washouts were observed onsite (see photos). A washout pit was installed prior to the audit closing meeting (see photos). | Compliant Opportunity for improvement | It is recommended that system documentation, e.g. the CEMP, Site Induction, Forms and Checklists, be reviewed to include requirement for concrete washout. |
| DC-C34 | Asbestos | The Applicant is to consult with SafeWork NSW concerning the handling of any asbestos waste that may be encountered during construction. The requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 – 'Transportation and management of asbestos waste' must also be complied with. | During construction | | | | | |
| DC-C35 | Community Consultation | The Applicant must consult with the community regularly throughout construction, including consultation with the nearby sensitive receivers identified in the EIS, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders. | During construction | Contractor | The Penshurst Public School Community Consultation Strategy (14/3/2019) outlines the proposed communication and engagement tools to be used throughout each phase of the project. Evidence of Principal consultation records was requested via email 31/7/19 and 7/8/19. No evidence provided. The SINSW website provides information about the project, including community updates (e.g. Project Update July 2019). Discussion onsite with Site Team, SINSW, Root Partnerships, DP&E officers during DP&E site visit. SINSW advised website and filers used to communicate about project. 6 week lookaheads are provided. Complaint recieved from adjacent resident prior to commencement about potential construction impacts. Privacy screen installed (see photos). Email from ajdacent resident about boundary issues. Boundary survey to be undertaken. No complaints to far about truck movement or worker vehicle parking. Site Manager has informal meetings and communication with adjacent private school principle. No Principal meetings with adjacent sensitive recoptors (e.g. private school). DP&E Officers Versense States and the sensitive recommended that regular meetings be undertaken. | (a) The Applicant has not had regular consultation with the adjacent school throughout construction. The Site Manager has had informal meetings and communication with the adjacent private school. (b) Minimal evidence was provided to demonstrate ongoing consultation, or implementation of communication and engagement tools identified in the strategy. Community updates are provided via the website and there is evidence of complaints being effectively addressed (e.g. privacy screen). | Compliant Opportunity for improvement | (a) It is recommended that regular meetings be held with nearby sensitive receivers (e.g. schools). (b) Development of a consultation register would assist to evidence ongoing consultation with the community throughout construction. |
| DC-C36 | Independent Audits | Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an Independent Audit Program or commencement of an Independent Audit. | During construction | Contractor | Refer to Appendix B | | Compliant | |
| DC-C37 | Independent Audits | No later than four weeks after the date notified for the commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority. | During construction | Contractor | Site Administrator advised site Posession 8/3/19. Date notified for the commencement of construction 4/3/19. Commenced construction 2/4/19. Audit Program submitted to DP&E 8/7/19. Sighted email from SINSW notifying DP&E of the non- compliance on 18/7/19. | The Audit Program was submitted later than 4 weeks after the date notified for the commencement of construction. | Non-compliant | SINSW notified DP&E of the non-compliance on 18/7/19. |
| DC-C38 | Independent Audits | Table 1 of the Independent Audit Post Approval Requirements (Department 2018) is amended so that the frequency of audits required in the construction phase is: (a) an initial construction Independent Audit must be undertaken within eight weeks of the notified commencement date of construction; and (b) a subsequent Independent Audit of construction must be undertaken no later than six months from the date of the initial construction Independent Audit. | During construction | Contractor | Site Administrator advised site Posession 8/3/19. Date notified for the commencement of construction 4/3/19. Commenced construction 2/4/19. Audit commenced 30/7/19. Subsequent audit to be completed no later than end of December 2019. | An initial construction Independent audit was not undertaken within 8 weeks of the notified commencement date of construction. Sighted email from SINSW notifying DP&E of the non- compliance on 18/7/19. | Non-compliant | SINSW notified DP&E of the non-compliance on 18/7/19. |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|--------------------------------|---|------------------------|----------------|---|---|-------------------|---|
| DC-C39 | Independent Audits | Independent Audits of the development must be carried out in accordance with: (a) the Independent Audit Program submitted to the Department and the Certifying Authority under condition C35 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). | During construction | Contractor | Approval of the Audit Team was provided on 28 June 2019. The Audit Program was provided to SINSW on Monday 8 July, for review / comment. No feedback or comments were provided. Various verbal and email correspondence took place between the Auditor, Contractor and SINSW in relation to scope development consultation requirements key stakeholder contacts. Auditor formally requested key information and contact details for stakeholders, including government agencies on 187/19. A response was received from DP&E that the project did not have a Community Consultative Committee. No contact details or other responses were provided. On 19 July the Auditor sent an email to Root Partnerships and SINSW to advise that the audit was being planned for 29 July - 1 August 2019 and requested to please advise if any consultation is required prior to then and provide the relevant contacts. No response was received. | Consultation with key stakeholders on audit scope development was not undertaken as required by Section 3.2 of the Independent Audit Methodology Requirements in the Indepedent Audit Post Approval Requirements. | Non-compliant | Key agency and stakeholder contacts (e.g. DP&E, EPA, Council, sensitive receivers) are to be provided to the Independent Auditor in preparation for subsequent independent audit (planned for December 2019). |
| DC-C40 | Independent Audits | 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 C38 of this consent; (b) submit the response to the Department and the Certifying Authority; 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 Certifying Authority in writing at least seven days before this is done. | During construction | Contractor | | | Not triggered | |
| DC-C42 | Incident Management | The Department must be notified in writing to compliance@planninq.nsw.qov.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. | | Contractor | Project Manager advised no environmental incidents to date. | | Compliant | |
| DC-C43 | Non-compliance notification | 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 Certifying Authority 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. | | Principal | Reviewed letter from SINSW to Dept P&E notifying of non-compliance with Conditions C37 & C38 of the Development Consent, dated 18/7/19. The letter states that SINSW became aware of the appointment following the Secretary's appointment of the Independent Auditor on 27/6/19. | The Department was not notified in writing within seven days after the applicant becoming aware of the non-compliance with Conditions C37 & C38 of the development Consent. | Non-compliant | The Department was not notified in writing within seven days after the applicant becoming aware of the non-compliance with Conditions C37 & C38. |

| ID | Aspect | Requirement | Development Phase | Responsibility | Evidence Collected | Findings and Recommendations | Compliance Status | Recommendation |
|--------|------------------|---|------------------------|----------------|---|------------------------------|-------------------|----------------|
| DC-C44 | | Within three months of: (a) the submission of a compliance report under condition B35; (b) the submission of an incident report under condition C42; (c) the submission of an Independent Audit under condition C39; (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 Certifying Authority must be notified in writing that a review is being carried out. | During construction | Contractor | | | Not triggered | |
| DC-C45 | Management Plans | 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 Certifying Authority. Where revisions are required, the revised document must be submitted to the Certifying Authority for approval within six weeks of the review. | During construction | Contractor | The Project Manager advised that the updated EMP had been provided to the Principal. Evidence was not sighted in the audit. | | Compliant | |



Appendix B - Planning Secretary Audit Team Agreement

Penshurst Public School Project Grindley Construction Pty Ltd

Project Number: 6280

Development Consent Application Number: SSD 8365

| Revision no. | Author | Purpose / Change | Certified by | Date |
|--------------|-----------------------------------|----------------------------------|----------------------|----------------|
| 1.0 | Bonnie Mulholland (Auditor) | Draft for proponent review | Kobi Simmat (CEO) | 26 August 2019 |
| | | | | |





Department of Education ATTN: Pete Krause **Project Director** Level 8, 259 George Street SYDNEY NSW 2000

Contact: Emmanuel Smith-Aspros Phone: 02 8275 1232 Email: compliance@planning.nsw.gov.au

BY EMAIL ONLY: pete.krause@det.nsw.edu.au

Dear Mr Pete Krause

Agreement of Independent Auditor Penshurst Public School (SSD 8365)

Reference is made to the submission, dated 12 June 2019, seeking the agreement of the Secretary of the Department of Planning and Environment (the Department) of a suitability qualified, experienced and independent audit team to undertake independent audits of the Penshurst Public School project.

In accordance with Condition C36, Schedule 2 and the Independent Audit Post Approvals Requirements (Department 2018), the Secretary has agreed to the following audit team:

- Mr Kobi Simmat; and
- Ms Bonnie Mulholland. .

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

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

The Department reserves the right to request an alternate team for future audits.

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

If you have any questions, please contact Emmanuel Smith-Aspros on the details listed above.

Yours sincerely

Kate Moore

27/-6/2019

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

Department of Planning and Environment 320 Pitt Street Sydney 2000 | GPO Box 39 Sydney 2001 | 1300 305 695 | planning.nsw.gov.au

Page 1 of 1



Appendix D - Independent Audit Declaration Form

Penshurst Public School Project Grindley Construction Pty Ltd

Project Number: 6280

Development Consent Application Number: SSD 8365

| Revision | Author | Purpose/Change | Certified by | Date |
|----------|--------------------------------|---|----------------------|----------------|
| 1.0 | Bonnie Mulholland (Auditor) | Draft for proponent review | Kobi Simmat (CEO) | 5 August 2019 |
| 2.0 | Bonnie Mulholland (Auditor) | Second Draft with proponent Feedback | Kobi Simmat (CEO) | 26 August 2019 |
| | | | | |



Appendix C – Independent Audit Declaration Form Template

Independent Audit Declaration Form

| | Number SSD 8365 |
|-----------------------|--|
| Descrip | Dion of Project REMOVAL OF EXISTING SCHOOL BUILDINGS AND CONSPUCTION |
| Project | Address 18 ARCADIA ST PENSHURST. |
| Propon | ent DEPARTMENT OF EOUCATELY. |
| Title of | |
| Date | 30 JULY 2019 - 1 AUGUST 2019 |
| l declar Indepe | e that I have undertaken the Independent Audit and prepared the contents of the attached ndent Audit Report and to the best of my knowledge: |
| - | the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2018); |
| - | the findings of the audit are reported truthfully, accurately and completely; |
| - | I have exercised due diligence and professional judgement in conducting the audit; |
| \approx | 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 except as otherwise declared to the Department 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 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 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) |
| | |
| iignatur Qualifica | tion Ba App Sc (Envronmental Monogenut) LONDANDITURE |
| Compan | V BEST PRACTICE CERTFICATION PTV UTD. |
| 5 | UTTEZ LEVEL Z. |
| | 22-126 OLD PITTWATER RD. |
| R | RODA/ALE NSW 2100. |
| | Audit Post Approval Requirements June 2018 9 16 |
| | 16 |



Appendix F - Site Inspection Photographs

Penshurst Public School Project Grindley Construction Pty Ltd

Project Number: 6280

Development Consent Application Number: SSD 8365

| Revision | Author | Purpose/Change | Certified by | Date |
|----------|--------------------------------|---|----------------------|----------------|
| 1.0 | Bonnie Mulholland (Auditor) | Draft for proponent review | Kobi Simmat (CEO) | 5 August 2019 |
| 2.0 | Bonnie Mulholland (Auditor) | Second Draft with proponent Feedback | Kobi Simmat (CEO) | 26 August 2019 |
| | | | | |







Public way not obstructed





Site Signage



Asbestos stockpiles covered in geofabric.





Waste containment area



Retained bricks for use in retaining wall





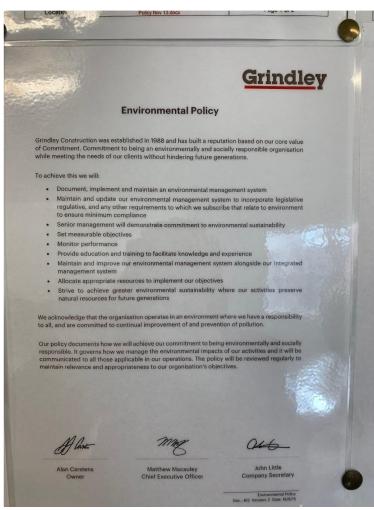
Spill kit located at hazardous substances storage area





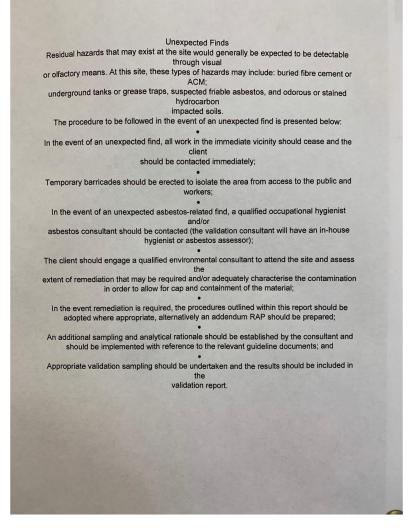
Daily Prestart





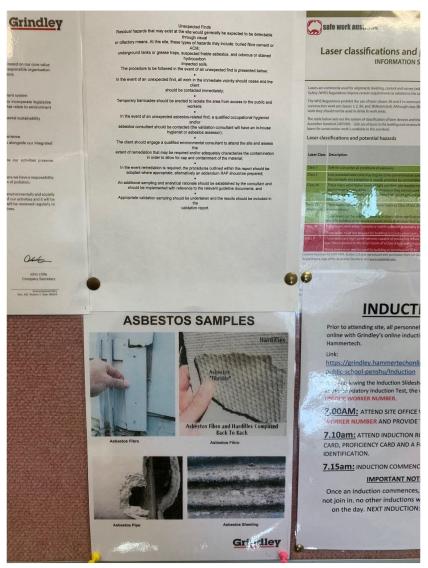
Environmental Policy displayed on notice board





Unexpected finds procedure displayed on notice board





Unexpected finds procedure displayed on notice board



| Date Plant Stated on | Plant Registration M | Uniter Plant Type, Mazer and | HouserD | una at time of ins | Regaration Vertiled by an | al | | | | |
|---|----------------------|--|---------|--------------------|------------------------------------|--|------------|----------------------|----------------------|--------------------|
| | | | 17. | MUNCO MONORAL | (Non Plant Inspection Checksur) | Milestone Type for Each Service Fr Rhs. Levens 2002rej | Next Main | Ing book bloom bloom | Martinoirus Consulat | Date Plant of site |
| 1/4/19 | 16 5420 | 1 GESQX-SOI | 42 4561 | DATE | 0.10 | 14 | HOUR 490 0 | DATE | by wind Date | |
| listate | 215/14-10-01 | 6 Grindley | | 1 | 010 | 450 Hes | | | | |
| 17/4/4 | 15/14-10-58 | (Stings 2 STX 4m | | 17/419 | 0 | Yearly | | 17/4/19 | chrs | |
| 22/5/19 7 | | BCIBOOXL Philite freese | 3434 | | 011 | 250 HRS | 5700 | 23/5/14 | | 2915 |
| 1 - / / | | Shap Grathe SP 2015-Tex Platere true So | | | 012 | ZSCHA | | | | 2915 |
| 30/5/17 Co 303 | SETR . | | 1500 | | ø. | ZJOHNS | 750 | | 4. | 31/5 |
| 30/5/17 Co 30/5/17 30: 16/7/19 615 23/7/19 Serie 32 | 76 | 5.5 T YANMAR 10 55-68 | . 4215. | | \$ 283 01 | 250Hrs | 4250 | | | |
| 23/7/19 Seri | 28. C | VIANMAR VIO 55 - 6B Soilnec - 5R4 Ucipila : | 6869 4 | Hslight | *13 | 250 HAS | 6734 | | | |
| | | 24T 315 T | OHIS | - | 14 | 250 445 | 2500 | - | dr. | |
| 7/7/17 TEY11 17/19 10000 100 100 100 100 | HI DYN 51 PAD | APAC ST FOOT ROUTER | 1866 | | 15 | 250 Hes | | | | |

| | net: Ner Garnet en Ste | Plant Regardation Nu | mber Plant Type, Model and (| Hours or Date at 2 Annual of agencies | ne of had Gate (http://time/line/line/ (http://time/line/line/ Checkbarg) | Statestores Type for Early Sectors Ge Kles, 2 classes, direct | | na Campuond Elete Plant of site and Elete |
|---------|------------------------------|----------------------|------------------------------|---|---|---|-----------|---|
| 10/ | 4/19 /0 | 51576 | 5-5-ext childed! | HOURS HCI LOUS | DATE O'D' | 250HTRS | HOUR DATE | 11-419 |
| 10/4/ | 14 9 | 1320 | 35+ ext childh; | 6475 | cur | 250. M | 2725 | 27/0/19. |
| 15/4/ | 14 0 | 5-719 | SST Star Crum Zwing Crucs | 21313 | 003 | CSOHM | 21500 | 15/4/19 |
| 17/4/19 | 88 | 40 | Eur Allarch | 1586 | 064 | 250 1485 | 201660 | 1714/19 |
| 17/4/19 | NB1 GOI | 56 | 26T ex Chalouhi | 5-436 | 005 | 250485 | 5 679 | 21-5-19 |
| 18/4/11 | NBX OU14 | + 2 | 6t ex chelahi | 5026 | 606 | 2 satus | 5250 | |
| 9/4/19 | Gourts | s lev All | ist hit. | 3841 | 007,007 AB | 90days | 25-7-14 | 15/19 |
| 's /n | 72334 | | -t exacult | 1486 | 00% | 2510419 | 1442 | 10-5-19 |
| 119/26 | 2/40 | Eli | Pachi | 453 | 004 | SZOHA | South | 10/5/1 |

Plant and Equipment Maintenance Register



| | DI | 30317 |
|---------|--|------------------|
| 1 | Plant and Equipment Inspection Checklist | |
| | Project Number: 63.80 · Plant ID Number: | 15. |
| | Subcontractor: Charlochi | |
| | Plant/Equip. Type: Red foot collec. Model: I | yraphic 57 |
| | Serial Number: 10000 100 TOA 0 1105tlog (Hours/KM's): | |
| | item | Y |
| | Workplace Regulator Registration Dees plant/equip. require registration? (attach copy to Checklist) Ypical items requiring registration are tower cranes, mobile cranes 10 nore, concrete pumps with delivery booms, jifts, building maintananc | tonne or |
| R | lisk and Hazard Assessment | 1 |
| C | topy of received? (attach copy to Checklist) | |
| O Is | perators Manual the plant/equip, operators manual kept and available with the plant | /equip.? |
| Lo | ng Book the plant/equip. log book kept and available with the plant? | / |
| Co | intenance py of most recent maintenance record received? (attach copy to 0 he most recent maintenance completed within the required frequ | Checklist) |
| ls a | fire extinguisher in date, charged, securely fixed and readily acc | essible? |
| Flas | shing light working and positioned in a place that is visible to oth | ers? |
| For | ward and reverse beeper working and audible? | |
| Roll | over protection system (ROPS) is fitted and certified? | |
| Fallir | ng objects protective structures (FOPS) in and certified? | ul reducerto |
| Seatl | belt is fitted and functional? | to the second of |
| - 7"1 | | proved the |

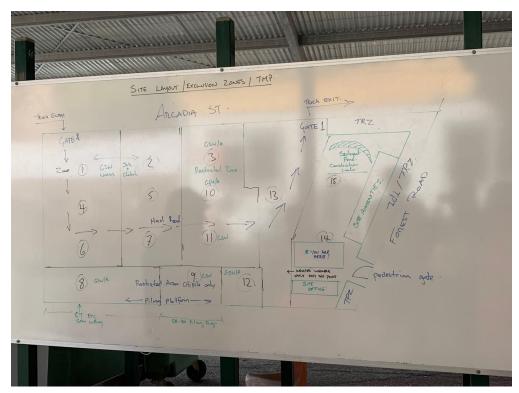
Plant and Equipment Maintenance Register





Site security





Asbestos plan





Tree Protection Signage





Asbestos signage



Stabilised stockpile





Temporary drainage controls





ESC materials onsite



Dust monitor (in barricaded area)





Stabilised vehicle access



Vehicle washdown





Waste segregation





Privacy screen

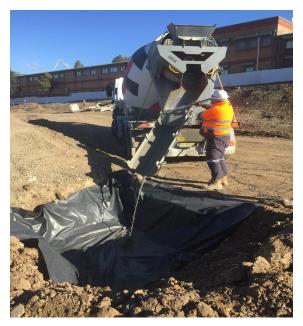






Uncontrolled concrete washout



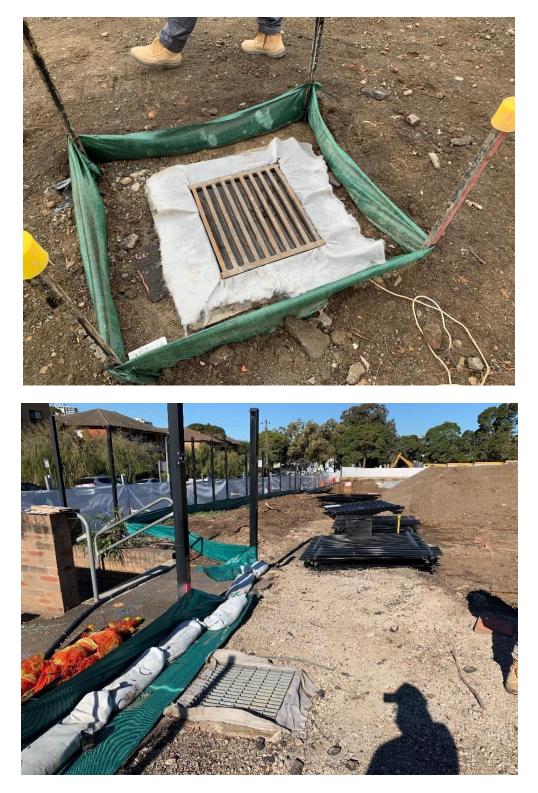


concrete washout pit installed



Possum





Erosion and sediment controls





Erosion and sediment controls





Drains covered in geofabric





Drains covered in geofabric



Drains protected

JBEST**PRACTICE**



Dust control



Appendix G - Audit Program

Audit Program

Independent Environmental Audit Prepared by Best Practice Certification Pty Ltd

Penshurst Public School Project Grindley Construction Pty Ltd

Project Number: 6280 Development Consent Application Number: SSD 8365





1. Introduction

This Independent Audit Program has been prepared by Best Practice Certification Pty Ltd for the Penshurst Public School Project being undertaken by Grindley Construction Pty Ltd in accordance with the following documents:

- Development Consent Application Number: SSD 8365 (the Development Consent)
- Independent Audit Post Approval Requirements, June 2018, Department of Planning and Environment (Post Approval Requirements)

2. Audit Schedule

In accordance with the conditions of the Development Consent an initial construction independent audit is to be undertaken within 8 weeks from the notified commencement date of construction. A subsequent construction audit must be undertaken within 6 months from the date of the initial construction audit.

As per the Post Approval Requirements, for projects > 52 weeks in duration, independent audits are to be undertaken at intervals no greater than 52 weeks, and may be undertaken in concurrence with the Third Party ISO 14001 EMS Audit.

The proposed Audit Schedule is detailed in Table 1 below.

Table 1: Audit Schedule

| Audit type | Timing | Scheduled date |
|------------------------------|--|----------------|
| Initial independent audit | Within 8 weeks from notified commencement date of construction | May 2019 |
| Subsequent independent audit | Within 6 months from the date of the initial construction audit | Nov 2019 |
| Annual construction audit | At intervals no greater than 52 weeks* | Nov 2020 |

*may be undertaken in concurrence with Third Party ISO 14001 EMS Audit



2. Audit scope

2.1 Environmental Compliance

In accordance with the Post Approval Requirements, the scope of Independent Environmental Audits is to include an assessment of compliance with the following:

- Conditions of the Development Consent applicable to the phase of development being audited
- Requirements of the Penshurst Public School Project Specific Environmental Management Plan Rev 1 (Project EMP) and sub-plans / attachments, including:
 - Impact Mitigation Plan IMP006 Air Quality and Dust
 - Impact Mitigation Plan IMP004 Waste Management
 - Grindley Construction Environmental Management Manual
- Construction Management Plans required to be prepared under the Development Consent, including:
 - Construction Waste Management Sub-Plan (Operational Waste Management Plan (WMP))
 - Construction Noise & Vibration Management Plan
 - Construction Soil & Water Management Plan
- Any relevant environmental licenses and approvals

2.2 Environmental Performance

In accordance with the Post Approval Requirements, the scope of Independent Environmental Audits is to include an assessment of environmental performance, including:

- Actual impacts compared to predicted impacts in the Environmental Assessment
- The physical extent of the development compared to the approved boundary, and any off-site impacts
- Incidents, non-compliances and complaints in the audit period
- The performance of the development in relation to:
 - Agency policy
 - Particular environmental issues identified through stakeholder consultation (see below)
- Feedback from Agencies and stakeholders on the performance of the project in the audit period



2.3 Previous Independent Audit Findings

Previous Independent Audit findings will be considered in each audit scope, including the implementation status of findings and recommendations.

2.4 Project Environmental Management System (Project EMS)

The audit will include a high level review of the Project EMS, including:

- An assessment of any Third Party Certification of the Project EMS
- The type, nature and scope of the Project EMS in relation to the Project
- Implementation of the Project EMS
- Identification of any key deficiencies in the Project EMS

2.5 Environmental Management Plans and Procedures

Independent Audits will include a high level evaluation of the EMP and Subplans, including whether the relevant plans and procedures:

- Have been developed in accordance with the conditions of the Development Consent
- Are being implemented in accordance with the Development Consent
- Are adequate to achieve compliance with the Development Consent, taking into consideration whether there are any non-compliances resulting from implementation of the documents, and whether there are any opportunities for improvement

2.6 Stakeholder Consultation

Prior to conducting audits, the auditor will consult with the relevant agencies and stakeholder groups identified in the Community Consultation Strategy, including where applicable:

- Department of Planning and Environment
- Environmental Protection Agency
- Office of Environment and Heritage
- Gorges River Council
- Project Reference Group
- Brabond Brakes & Automotive Repairs
- Oatley Service Centre
- Outside Edge Picture Framing

Applicable stakeholder comments are to be recorded in the Independent Audit Report, along with the results of investigation of any specific environmental issues raised in consultation. The Audit Table will also be amended and resubmitted as necessary.



3. Audit Tables

Audit Table 1: Pre-construction

| ID | Aspect | Requirement | Development Phase | Findings and Recommendations |
|---------|----------------------------|---|--|---------------------------------|
| EMP-10G | Management Plans | Site Management Team responsible for production, review and approval of Work Method Statements and Waste Management Plan | Pre-construction and During Construction | |
| EMP-14A | Management Plans | The Site Manager will review all Subcontractor Management Plans and waste management plans submitted and obtain approval from Project Manager before allowing work to commence on site | Pre-construction | |
| EMP-19E | Management Plans, Waste | A Waste Management Plan will be developed in conjunction with the selected waste contractor for the project and will be audited at random intervals throughout the course of the project. | Pre-construction | |
| DC-A21 | Access to Information | Documents must be available on the website including: • Statutory Approvals • Strategies Plans and Programs • Reporting on environmental performance • Summary of monitoring results • Complaints register • Audit reports Information must be kept up to date | Pre-construction and During Construction | |
| DC-A22 | Subcontractor | Employees contractors and subcontractors are made aware of, and instructed to | Pre-construction | |



| | Management Training and Awareness | comply with conditions of development consent | and During Construction |
|--------|---|---|--|
| DC-A12 | Community Consultation | Where conditions require consultation with an identified party, the applicant must: consult on document prior to submitting for approval and provide details of the consultation undertaken, including the outcome (matters resolved and unresolved), and details of any disagreement remaining. | Pre-construction and During Construction |
| DC-B1 | Notification | Department notified in writing of dates of commencement of physical work and operation at least 48 hours prior | Pre-construction |
| DC-B4 | Dilapidation Report | Prior to commencement (a) make arrangements with service providers affected by the development (b) prepare dilapidation report (c) submission of dilapidation report to Certifier and Council | Pre-construction |
| DC-B13 | Management Plans, Community | Prepare Community Communication Strategy, for submission to Planning Secretary, approval of by Planning Secretary | Pre-construction |
| DC-B14 | Sustainability | Register for minimum 4 star Green Star rating with Green Building Council Australia, submit evidence of registration to Certifying Authority | Pre-construction |
| DC-B17 | Management Plans | Preparation of a Construction Environmental Management Plan (CEMP) | Pre-construction |
| DC-B18 | Management Plans | Certifying Authority approval of CEMP | Pre-construction |
| DC-B19 | Management Plans, Traffic | Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) to address sub conditions (a) - (g) | Pre-construction |



| DC-B20 | Management Plans, Noise | Construction Noise and Vibration Management Sub-Plan to address sub conditions (a) - (f) | Pre-construction | |
|--------|----------------------------|--|------------------|--|
| DC-B21 | Management Plans, Waste | Construction Waste Management Sub-Plan (CWMSP) to address sub conditions (a) - (b) | Pre-construction | |
| DC-B22 | Management Plans, ESC | Construction Soil and Water Management Plan (CSWMSP) to address sub conditions (a) - (e) | Pre-construction | |
| DC-B23 | Construction Parking | Construction vehicle parking facilities on-site to be provided | Pre-construction | |
| DC-B26 | Waste | Submission to RMS Traffic Management Centre of truck route(s) to be followed by trucks transporting waste material from site | Pre-construction | |
| DC-B33 | Cultural Heritage | Submission to Council, the Heritage Division and Planning Secretary of photographic archival record in hard and digital copy | Pre-construction | |



Audit Table 2: Pre-building works

| ID | Aspect | Requirement | Development Phase | Findings and Recommendations |
|----------|-----------------------|--|----------------------|---------------------------------|
| DC-A5/A6 | Tree Protection | The proposed Chinese Tallowood Arcadia Street trees must be replaced with either Fiddlewood, Jacaranda or Pear Tree to minimise potential off-site environmental impacts to existing nature revegetation areas. Details demonstrating compliance must be provided to the satisfaction of the certifying authority prior to the commencement of building works. | Pre-building works | |
| DC-B2 | Certified Drawings | Certifier acceptance of structural drawings demonstrating compliance with BCA and development consent | Pre-building works | |
| DC-B3 | Cladding | Submission to Certifier of documented evidence that external walls including finishes and claddings comply with BCA Forwarding of same documented evidence to Planning Secretary within seven days of Certifier accepting them | Pre-building works | |
| DC-B5 | Site Contamination | Additional site investigations of untested in inaccessible areas of the site to be undertaken | Pre-building works | |
| DC-B6 | Site Contamination | Update Remediation Action Plan to reflect findings of additional site investigations conducted for condition B5 | Pre-building works | |
| DC-B7 | Asbestos | Submission to Site Auditor of Asbestos Works Management Plan, Plan considered appropriate by Site Auditor and Plan implemented | Pre-building works | |
| DC-B8 | Site Contamination | Remediation works carried out in accordance with Site Investigation and Remediation Action Plan that is required to be updated by condition B6 | Pre-building works | |
| DC-B9 | Site Contamination | Submission of Site Audit Report and Section A Site Audit Statement to Certifying Authority, Report and Audit to their satisfaction | Pre-building works | |



| DC-B10 | Site Contamination | Prepare unexpected contamination procedure and incorporate within the Construction Environmental Management Plan in accordance with condition B17 Any material identified as contaminated must be disposed off site, submission to Planning Secretary of disposal location and results of testing prior to removal from site | Pre-building works | |
|--------|---------------------------|--|--------------------|--|
| DC-B11 | Utilities and Services | Obtain relevant approvals from service providers for any utility works | Pre-building works | |
| DC-B12 | Utilities and Services | Obtain written advice from electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) confirming the adequate provision of services | Pre-building works | |
| DC-B15 | Outdoor Lighting | Submission of compliance to AS 1158.3.1 2005 to Certifying Authority, compliance to their satisfaction | Pre-building works | |
| DC-B16 | Accessibility | Submission of compliance to the BCA in regards to access and facilities for people with disabilities to Certifying Authority, compliance to their satisfaction | Pre-building works | |
| DC-B24 | Stormwater Management | Submission of designed stormwater management system to Certifying Authority, design to their satisfaction | Pre-building works | |
| DC-B25 | Noise | Submission of detailed design drawings to Certifying Authority, Certifying Authority to verify all reasonable and feasible noise mitigation measures have been incorporated into the design | Pre-building works | |
| DC-B27 | Waste | Obtain agreement from Council for the design of the operational waste storage area where waste removal is undertaken by Council | Pre-building works | |
| DC-B28 | Mechanical Ventilation | Submission of compliance to Part F4.5 of the BCA and AS 1668.2 2012 and AS/NZS 3666.1 2011 to Certifying Authority, compliance to their satisfaction | Pre-building works | |
| DC-B29 | Rainwater Harvesting | Rainwater reuse/harvesting system developed for site prepared and certified by an experienced hydraulic engineer | Pre-building works | |



| DC-B30 | Car Park Design | Car parking and service vehicle layout to comply with sub conditions (a) - (d), submission of design to Certifying Authority, design to their satisfaction | Pre-building works | |
|--------|------------------------------------|--|--------------------|--|
| DC-B31 | Bicycle Parking Design | Bicycle parking and end-of-trip facilities to comply with sub conditions (a) - (f), submission of design to Certifying Authority, design to their satisfaction | Pre-building works | |
| DC-B32 | Public Domain Works Approval | Submission of Council's approval to Certifying Authority | Pre-building works | |
| DC-B36 | Cultural Heritage | Reuse of significant and original heritage fabric, where not possible donated to reputable local recycling facility or centre specialising in building materials | Pre-building works | |
| DC-B37 | llandscaping | Submission of Landscape Management Plan to Certifying Authority, Plan to their satisfaction | Pre-building works | |



Audit Table 3: During Construction

| ID | Aspect | Requirement | Development Phase | Findings and Recommendations |
|-----------------|---|--|----------------------|---------------------------------|
| EMP-10A | Management Plans | The Project Manager and his nominees shall review weekly the effectiveness of the Project EMS system and will consider project safety and environmental issues | During construction | |
| EMP-10B | Management Plans | Preparation and updating of project environmental programs /procedures, and monitoring of progress will be undertaken as required, e.g. by client, latent environmental conditions or considerations. | During construction | |
| EMP-10C | Incidents and Non-conformances | Non-conformance and incidents (including corrective and preventative actions) to be managed in accordance with the Grindley Construction Environmental Management Manual | During construction | |
| EMP-13A | Incidents and Non-conformances | The Project Manager will review all incident/non-conformance records, accident & incident reports and audit reports | During construction | |
| EMP-10D /ERP | Environmental Protection Measures | Environmental protection apparatus will be installed ready for use in case of emergency. For environmental spill to: • Contain the spill and control its flow • Block storm water drains downstream of the spill • Clean up the spill To manage failure of ESC Controls to: • Contain/minimise the flo. For discovery of items of conservation value or contaminated value to: • Fence off the area as "no go" zone For rupture of pipelines to: | During construction | |



| | | Block storm water drains downstream of the spill | | |
|---------|------------------------------|---|---------------------|--|
| EMP-10E | Training and awareness | Environmental Inductions | During construction | |
| EMP-10F | Leadership | HSE Meetings | During construction | |
| EMP-10H | Waste | Monitoring adherence to Waste Management Plans (Operational as per Head Contract) | During construction | |
| EMP-10I | Monthly Report | Monthly Reporting | During construction | |
| EMP-11A | Environmental Inspections | Environmental Inspections: Weekly Environmental Inspections and Inclement Weather Inspections conducted by Environmental Officer (p14) Monthly Inspection to be undertaken by WHSEQ Manager | During construction | |
| EMP-11B | Internal Audits | Internal Audits to be conducted 6 monthly and distributed to Management Team and Project Management Review Meeting | During construction | |
| EMP-12A | Site Sign | Site Sign will be erected giving contact details of the site manager to be contacted for any concerns/queries regarding the construction works | During construction | |
| EMP-12B | Community Consultation | Letters will be issued to all immediate neighbours also with Grindley contact details as well as an indicative start and duration of construction activities (If required). | During construction | |
| EMP-13B | Subcontractor Management | The Project Manager will establish an administrative system to monitor the subcontracts and the payment of subcontractors in relation to their environmental responsibilities | During construction | |
| EMP-13C | Waste | The Contracts Administrator will ensure that dockets required by EPA guidelines for waste and spoil removal are present before invoices are processed | During construction | |



| EMP-13D | Waste | The Contracts Administrator will ensure that waste removal contractors provide monthly reports of waste removed from sites | During construction |
|---------|-------------------------------------|--|---------------------|
| EMP-18A | Air Quality | Air Quality and Dust Management to be managed by Site Manager as per Impact Mitigation Plan 006 (IMP006) | During construction |
| EMP-18B | Air Quality | Dust minimisation techniques to be employed as needed during construction, including the use of water carts as necessary | During construction |
| EMP-18C | Air Quality, Plant and equipment | Proper maintenance of all machinery on site as per plant maintenance declaration form (form 129) | During construction |
| EMP-19A | Incident Management | Any project spills, discovery of contaminated material and cultural heritage finds to be managed in accordance with the Emergency Response Plan Section 4.1 of Project EMP | During construction |
| EMP-19B | Flora and fauna | Flora and Fauna on the site will be managed through the recommendations of the Flora and Fauna conditions detailed in the DA approval In the case of discovery of flora / fauna fence off the area as "no go" zone and contact the Site Manager or Project manager immediately for further action. | During construction |
| EMP-19C | Noise | Construction noise management will be in accordance with the Development Application | During construction |
| EMP-19D | Waste | Waste Management will be conducted in accordance with Impact Mitigation Plan 004 (IMP004) (refer to Appendix B) and Operational Waste Management Plan. | During construction |
| EMP-20A | ESC | Sediment and erosion control measures installed as per the ESC Plan: ESC devices will be installed during site preparation works along with the site fences and sheds Devices will be in place throughout all construction phases, especially excavation. | During construction |



| EMP-20B | ESC | Unnecessary disturbance of the site shall not occur | During construction |
|------------------|-----|--|---------------------|
| EMP-ESC- P20C | ESC | All cuts are to be stabilised as soon as possible after the completion of site earthworks | During construction |
| EMP-ESC- P20D | ESC | Extra care will be taken to prevent sediment run off into all neighbouring lots and stormwater | During construction |
| EMP-ESC- P20E | ESC | Any collected silt will be disposed of in accordance with all other relevant codes and standards. | During construction |
| EMP-20F | ESC | Silt fences are to be installed to all site boundaries as follows: Geotextile fabric will be fixed to the temporary construction fencing to the 'downhill' boundaries of the site. The fabric will be turned down under the existing ground line and secured at regular intervals not exceeding 3m in accordance with the diagram on page 20 of the EMP | During construction |
| EMP-21A | ESC | Vehicular access will be controlled to prevent sediment being tracked. This will be done by maintaining an all weather access/driveway composed of an approved course aggregate surface. Also if the need arises a shaker grid will be installed to the main access by Grindley Construction during the construction works. | During construction |
| EMP-21B | ESC | Any sediment that is tracked onto the surrounding roads will be cleaned off in a timely manner | During construction |
| EMP-21C | ESC | All stormwater inlets are to be covered with geotextile fabric in a roll or other format to ensure that no sediment enters into the stormwater system. This will be the responsibility of the Site Manager to enforce. The rolls will not only be placed directly at the inlets as shown below, they will also be placed at regular intervals in the gutters 'upstream' from the inlets creating multiple barriers. | |



| EMP-21D | ESC Stockpile Management | If appropriate topsoil is to be stockpiled on site then the following measures will be put in place. If stockpiling is required, stockpiles shall be stored at least 2 meters clear of drainage lines, natural watercourse and established trees. | During construction | |
|--------------|--|--|---------------------|--|
| EMP-22E | ESC Stockpile Management | Stockpiles will have temporary silt fences in place around the stockpiles to create an enclosure and if necessary they will be covered will shade cloth or tarpaulin to retain the materials on the stock pile. The location of stock piles will be determined on site. | During construction | |
| EMP-P21 D | Waste | Dedicated building waste enclosures will be set up around the site to enclose building waste where required. No waste enclosures will be set up outside of the site boundary. | During construction | |
| EMP-P22 A | Air Quality | Shade cloth to the boundary fences will be maintained throughout all stage of construction to assist in dust control | During construction | |
| EMP-22B | Air Quality | If excessive dust being created, the site will be watered down by a water truck where possible, and/or sprinklers and hose. | During construction | |
| EMP-22B | Air Quality Stockpile Management | All stockpiled soils will be covered during periods of high wind to reduce the dust created from on site storage. | During construction | |
| EMP-22C | ESC Site Inspections | In order to maintain the various erosion and sediment control devices, regular inspections, repairs and cleaning will be carried out on the silt fences to the boundaries, stockpiles, waste enclosures, and to the stockpile covers, in accordance with Section 2.4 of Project EMP | During construction | |
| DC-C1 | Management Plan Accessibility | Copy of approved and certified plans, specifications and documents incorporating conditions of approval and certification kept on site and readily available for perusal of Department, Council or Certifying Authority | During construction | |



| DC-C2 | Site Sign | Site notice (a) prominently displayed at the boundaries of the site (b) includes the minimum requirements as detailed in the condition | During construction | |
|-------|--|---|---------------------|--|
| DC-C3 | Plant and equipment | Plant and equipment(a) maintained in a proper and efficient condition(b) operated in a proper and efficient manner | During construction | |
| DC-C4 | Demolition Works | Demolition work to comply with AS 2601 2001 Submission of work plans and statement to Certifying Authority | During construction | |
| DC-C5 | Construction Hours | Construction, including the delivery of materials only carried out between documented times | During construction | |
| DC-C6 | Construction Hours | Notification to affected residents of activities allowed to be undertaken outside of times documented in condition C5 | During construction | |
| DC-C7 | Construction Hours | Rock breaking, rock hammering, sheet piling, pile driving, and similar activities only carried out between documented times | During construction | |
| DC-C8 | Management Plans, Environmental Inspections | Construction carried out in accordance with current CEMP and subplans | During construction | |
| DC-C9 | Construction Traffic | Construction vehicles (excluding worker vehicles) to be contained wholly within site or approved on-street work zone and vehicles must enter site before stopping | During construction | |



| DC-C10 | Road Occupancy Licence | If required Road Occupancy Licence (ROL) to be obtained from Transport Management Centre | During construction | |
|--------|---------------------------|--|---------------------|--|
| DC-C11 | Site Security | Site to be adequately secured to prevent access by unauthorised personnel and work must be conducted in accordance with relevant SafeWork requirements | During construction | |
| DC-C12 | Hoarding | Third party advertising on hoarding/fencing not Permitted. Graffiti to be removed from construction hoardings or the like within 48 hours if required submission of hoarding application to Council | During construction | |
| DC-C13 | Public Way | Public way not to be obstructed by any materials, vehicles, refuse, skips of the like | During construction | |
| DC-C14 | Noise | Execution of construction to achieve the construction noise management levels detailed in the Interim Construction Noise Guidelines (DECC 2009) Activities that could exceed levels to be identified and managed in accordance with approved Construction Noise and Vibration Management Plan | During construction | |
| DC-C15 | Noise | Construction vehicles not to arrive at site or surrounding residential precincts outside of construction hours documented in condition C5 | During construction | |
| DC-C16 | Noise | Audible movement alarms to be of a type that minimise noise impacts on surrounding noise sensitive receivers | During construction | |



| - | | | | |
|--------|-----------------|--|---------------------|--|
| DC-C17 | Noise | Noise generated not to be offensive as per Protection of the Environment Operations Act 1997 or exceed approved noise limits for the site | During construction | |
| DC-C18 | Noise | Vibration caused by construction must be limited to the latest version of DIN 4150-3 (1992-02) structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999) and Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) | During construction | |
| DC-C19 | Vibration | Vibratory compactors not to be used closed than 30 metres from residential buildings unless monitoring confirms compliance with the vibration criteria in condition C18 | During construction | |
| DC-C20 | Vibration | Limits in conditions C18 and C19 apply unless outlined in Construction Noise and Vibration Management Plan | During construction | |
| DC-C21 | Tree Protection | Street trees not to be trimmed or removed unless part of development consent, approved by Council or required in an emergency. Street trees must be protected, any tree damaged or removed, to be replaced to the satisfaction of Council Trees on site to be suitably protected as per Arboricultural Impact Assessment Report dated September 2018 (Revision C). Access to area within protective barrier during works and the removal of tree protection measures following completion of work to be carried out under the supervision of a qualified arborist | During construction | |
| DC-C22 | Air Quality | Reasonable steps to be taken to minimise dust generated | During construction | |
| DC-C23 | Air Quality | Exposed surfaces and stockpiles are supressed by regular | During construction | |



| | | watering Trucks entering or leaving site have their loads covered Trucks do not track dirt onto the public road network Public roads used by trucks are kept clean land stabilisation works are carried out progressively to minimise exposed surfaces | | |
|--------|-----------------------|---|---------------------|--|
| DC-C24 | Air Quality | Install and operate equipment in line with best practice to ensure compliance with load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in EPL | During construction | |
| DC-C25 | ESC | Erosion and sediment control measures to be implemented and maintained for the duration of the works and until such time as ground has been stabilised and rehabilitated | During construction | |
| DC-C26 | Site Contamination | Only VENM, ENM or other materials approved by EPA is brought onto site. Accurate records of volume and type of fill used to be kept Records available to Certifying Authority upon request | During construction | |
| DC-C27 | Site Contamination | Seepage or rainwater collected on-site during construction or groundwater not to be pumped to street stormwater system unless approved by EPA in writing in accordance with Protection of the Environment Operations Act 1997 | During construction | |
| DC-C28 | Cultural Heritage | In the event surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area A suitably qualified archaeologist and the registered Aboriginal representatives are to be contacted to determine the significance of the objects Site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) managed by OEH and management outcome for site included in information provided to AHIMS Consult with Aboriginal community representatives, the archaeologists an OEH | During construction | |



| | | to develop and implement management strategies Works recommence with written approval of OEH | | |
|--------|-------------------|--|---------------------|--|
| DC-C29 | Cultural Heritage | If any unexpected archaeological relics are uncovered, all works must cease in that area and OEH Heritage Division contacted Archaeological assessment and management strategy may be required Works recommence with written approval of Heritage Division of OEH | During construction | |
| DC-C30 | Waste | Waste secured and maintained within designated waste storage areas, must not leave site onto neighbouring public or private properties | During construction | |
| DC-C31 | Waste | Waste generated to be assessed, classified and management in accordance with Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) | During construction | |
| DC-C32 | Waste | Body of a 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 or spoil Mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of a vehicle, trailer or motorised plant leaving site must be removed before leaving premises | During construction | |
| DC-C33 | Waste | Concrete waste and rinse water not to be disposed of on site and are prevented from entering any natural artificial watercourse | During construction | |



| DC-C34 | Asbestos | If asbestos encountered during construction consult with SafeWork NSW and comply with Protection of the Environment Operations (Waste) Regulation 2014 in particular Part 7 - Transportation and management of asbestos waste | During construction | |
|--------|---------------------------|--|---------------------|--|
| DC-C35 | Community Consultation | Consult with community regularly throughout construction including with nearby sensitive receivers identified in EIS, relevant regulatory authorities, registered Aboriginal parties and other interested stakeholders | During construction | |
| DC-C36 | Independent Audits | Independent auditors to be agreed in writing by Planning Secretary | During construction | |
| DC-C37 | Independent Audits | Submission of independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) to Department and Certifying Authority | During construction | |
| DC-C38 | Independent Audits | Amending Table 1 of Independent Audit Post Approval Requirements (Department 2018), (a) initial construction independent Audit to be undertaken within eight (8) weeks of the notified commencement date of construction (b) subsequent independent Audit of construction must be undertaken no later than six (6) months from date of the initial construction independent Audit | During construction | |
| DC-C39 | Independent Audits | Independent Audits to be carried out in accordance the Independent Audit Program submitted to Department and Certifying Authority in condition C36 and requirements of Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (department 2018) | During construction | |
| DC-C40 | Independent Audits | Review and respond to each Independent Audit Report Submission of response to the Department and Certifying Authority Each Independent Audit Report and response publicly available, notification of to the Department and Certifying Authority | During construction | |



| DC-C42 | Incident Management | Notification to Department in writing after becoming aware of an incident / non-compliance notification to identify development, development application number and name if applicable and set out the location and nature of the incident Subsequent notification must be given and reports submitted in accordance with Appendix 1 of Development Consent | During construction | |
|--------|--------------------------------|---|---------------------|--|
| DC-C43 | Non-compliance notification | Notification to Department in writing after becoming aware of any non-compliance Certifying Authority to notify Department in writing after identifying any non-compliance | During construction | |
| DC-C44 | Management Plans | Within three (3) months of a compliance report under condition B34, an incident report under condition C42, an Independent Audit under condition C39, a direction of the Planning Secretary under condition A3 which requires a review being issued the strategies, plans and programs required under this consent must be reviewed and the Department and Certifying Authority notified of review | During construction | |
| DC-C45 | Management Plans | If necessary to improve the environmental performance of the development, cater for amodification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to satisfaction of the Certifying Authority. Where revisions are required, submission of revised document the Certifying Authority, approval of by Certifying Authority. | During construction | |