

Penshurst Public School Independent Audit Report

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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
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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	

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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	

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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	

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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	

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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	

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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	

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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	

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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

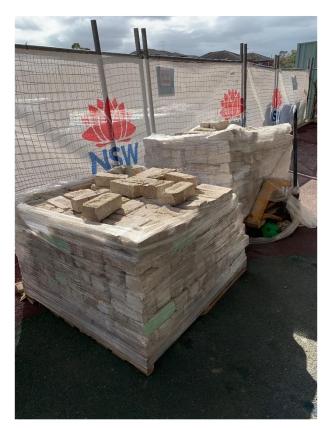


Asbestos stockpiles covered in geofabric.





Waste containment area



Retained bricks for use in retaining wall





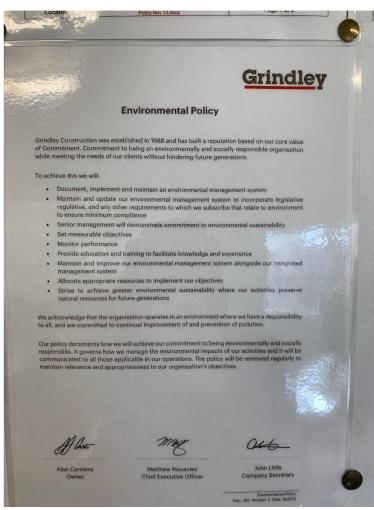
Spill kit located at hazardous substances storage area





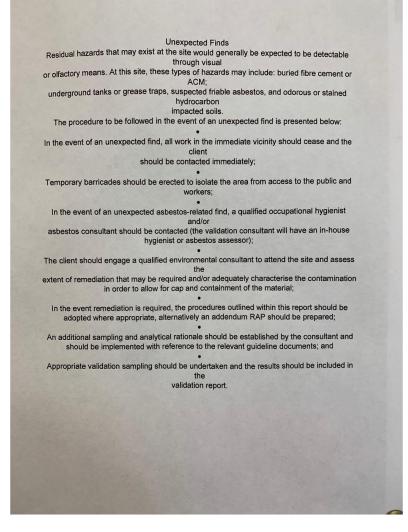
Daily Prestart





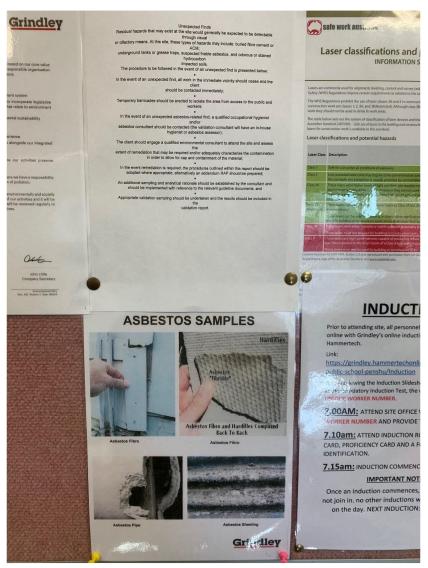
Environmental Policy displayed on notice board





Unexpected finds procedure displayed on notice board





Unexpected finds procedure displayed on notice board



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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

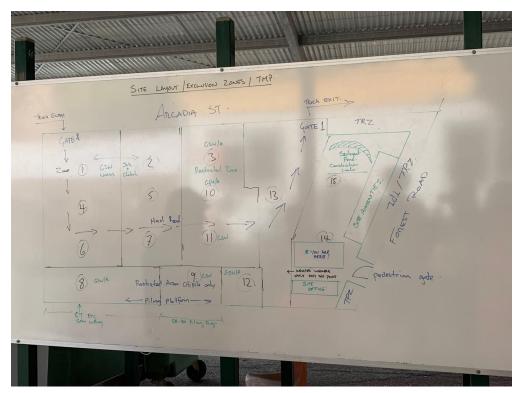
Plant and Equipment Maintenance Register





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

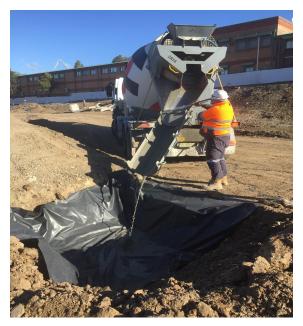






Uncontrolled concrete washout



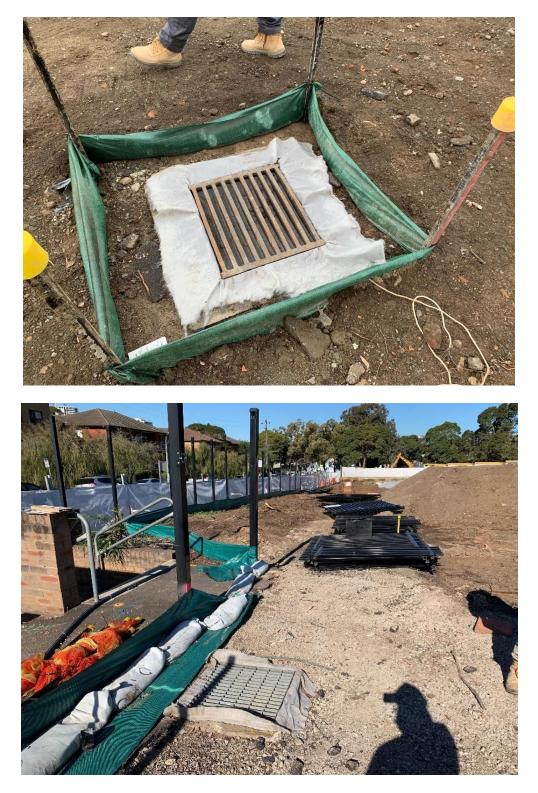


concrete washout pit installed



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	



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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	