



PICTON HIGH SCHOOL – SSD 8640

INDEPENDENT AUDIT REPORT

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Executive Summary

The NSW Department of Education – Schools Infrastructure NSW (SINSW) are responsible for delivering the Picton High School Redevelopment (PHS, or the Project). The Project involves a staged upgrade to the school to accommodate ,580 students and 125 staff and core facilities to accommodate 2,000 students.

Consent for the Project was granted on 20 December 2018, State Significant Development (SSD) 8640, subject to a number of Conditions of Consent (CoC).

The objective of this Independent Audit is to satisfy SSD 8640 Schedule 2, CoC C41. It requires that Independent Audits of the development be carried out in accordance with Project’s Independent Audit Program and the *Independent Audit Post Approval Requirements* (Department 2018). The Independent Audit seeks to verify compliance with the relevant CoCs and assess the effectiveness of environmental management on the Project.

This Audit Report presents the findings from the first Independent Audit for the construction period, covering the period of the granting of consent through to June 2019.

Mace Group have been appointed as the client representative on behalf of SINSW. Taylor Constructions are the principal contractor. Construction works began 10 May 2019. Works undertaken to date include site establishment, investigations, hazardous materials removal and demolition.

The overall outcome of the Independent Audit was positive. Compliance records were organised and available at the time of the site inspection and interview with SINSW, Mace and Taylor personnel on 19 June 2019. Relevant environmental and compliance monitoring records are being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements.

There were 109 CoCs and 26 CEMP and Sub-plan mitigation measures assessed. 13 non-compliances were identified against 16 CoCs. There were five non-compliances identified against the mitigation measures and commitments with the CCS, CEMP and Sub-Plans. The non-compliances predominantly related to omissions of required information within Project documentation, or records not being available at the time of the audit.

There were six observations identified in relation to the CoCs and the Construction Noise and Vibration Management Sub-Plan, Construction Soil and Water Management Sub-Plan and the Construction Waste Management Sub-Plan. These observations related to the adequacy of the documentation.

Detailed findings are presented in Section 3. Actions proposed by the Project team to address the findings of this Independent Audit are set out in Section 4.

The overall outcome of the Independent Audit was indicative of a commitment to compliance and environmental performance by SINSW, Mace and Taylor and their contractors carrying out the works. The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the Independent Audit.

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1. Introduction

1.1 The Project

The NSW Department of Education – Schools Infrastructure are responsible for delivering the Picton High School Redevelopment (PHS, or the Project). is located at 480 Argyle Street, Picton, approximately 80km south west of the Sydney Central Business District. The Project location is presented in Figure 1.



Figure 1: PHS location (modified from GoogleEarth, 2019).

The PHS redevelopment project (the Project) is to increase the School's capacity to meet the growing demand for public education in South West Sydney. The Project comprises the following alterations and additions:

- Demolition of Buildings (buildings A-H, L and Q), and associated excavation;
- Construction of a two to three storey building located along the central spine of the site connecting with existing retained buildings;
- Retention, re-purposing or refurbishment of Buildings (buildings I, J, K, M and N);
- Reconfiguration of car and bus drop off/pick up areas including new access from Wonga Road with an internal access road;
- Increasing teaching floor space incorporating permanent teaching spaces to accommodate 1,580 students and 125 staff and core facilities to accommodate 2,000 students;

- Associated landscaping works throughout the school site; and
- Operation of the upgraded school.

The Project was granted consent under Section 4.38 of the *Environmental Planning and Assessment Act 1979* on 20 December 2018 (State Significant Development 8640) subject to a number of conditions.

Mace Group (Mace) have been appointed as the client representative on behalf of Schools Infrastructure NSW (SINSW). Taylor Construction (Taylor) are the principal contractor. Construction works began 10 May 2019. Works undertaken to date include site establishment, survey and archeological investigations, hazardous materials removal and demolition.

1.2 Approval requirements

Conditions of Consent (CoC) C38 – C43 of Schedule 2 of SSD 8640 set out the requirements for undertaking Independent Audits (IAs or audit). The CoCs give effect to the Department's *Independent Audit Guideline Post Approval Requirements, 2018* (IAPAR).

1.3 The audit team

In accordance with Schedule 2, CoC C38 and Section 3.1 of the IAPAR, Independent Auditors must be suitably qualified, experienced and independent of the Project, and appointed by the Planning Secretary.

The Audit Team comprises:

- Derek Low (Auditor Lead): Masters of Environmental Engineering Management, Exemplar Global Certified Principal Environmental Auditor (Certificate No 114283)
- Steve Fermio (Auditor): Bachelor of Science (Hons), Exemplar Global Certified Principal Environmental Auditor (Certificate No 110498)

Approval of the Audit Team was provided by the Department on 3 May 2019. The letter is presented in Appendix C.

1.4 The objectives of the audit

The objective of this IA is to satisfy SSD 8373 Schedule 2, CoC C41. It states:

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 C38 (sic) of this consent; and*
- b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018)*

The IA Program was prepared in accordance with the IAPAR and submitted to the Department and the Certifying Authority. The IA Program (and CoC C40) specifies that the first IA must be undertaken within eight weeks of commencement of construction.

The IAPAR sets out the scope, methodology and reporting requirements for IAs.

This IA seeks to fulfill the requirements of CoC C41, verify compliance with the relevant CoCs and assess the effectiveness of environmental management on the Project.

1.5 The audit scope

This IA relates to the Project works from the granting of consent (20 December 2019) through to June 2019. Only sites establishment works, and Stage 1 construction had occurred to date.

The scope of the IA comprises:

- an assessment of:
 - CoCs applicable to the phase of the development that is being audited
 - post approval documents prepared to satisfy the CoCs, including an assessment of the implementation of Environmental Management Plans and Sub-plans
 - all environmental licences and approvals applicable to the development (excluding environmental protection licences issued under the *Protection of the Environment Operations Act 1997*).
- an assessment of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment.
 - the physical extent of the development in comparison with the approved boundary, and any potential off-site impacts
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - feedback received from the Department, and other agencies and stakeholders, including the community, on the environmental performance of the project during the audit period
- a review of the status of implementation of previous Independent Audit findings, recommendations and actions (if any)
- a high-level review of the project's environmental management systems, including assessment of any third party certification of them, the type, nature and scope of the systems having regard to the nature and scale of the development, and the implementation of the systems.

- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- details of any other matters considered relevant by the Auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

2. Audit methodology

2.1 Audit process

The IA was conducted in a manner consistent with AS/NZS ISO 19011.2014 – Guidelines for Auditing Management Systems and the methodology set out in the Department’s IAPAR. An overview of the audit activities, as specified in the standard, is presented in Figure 2.

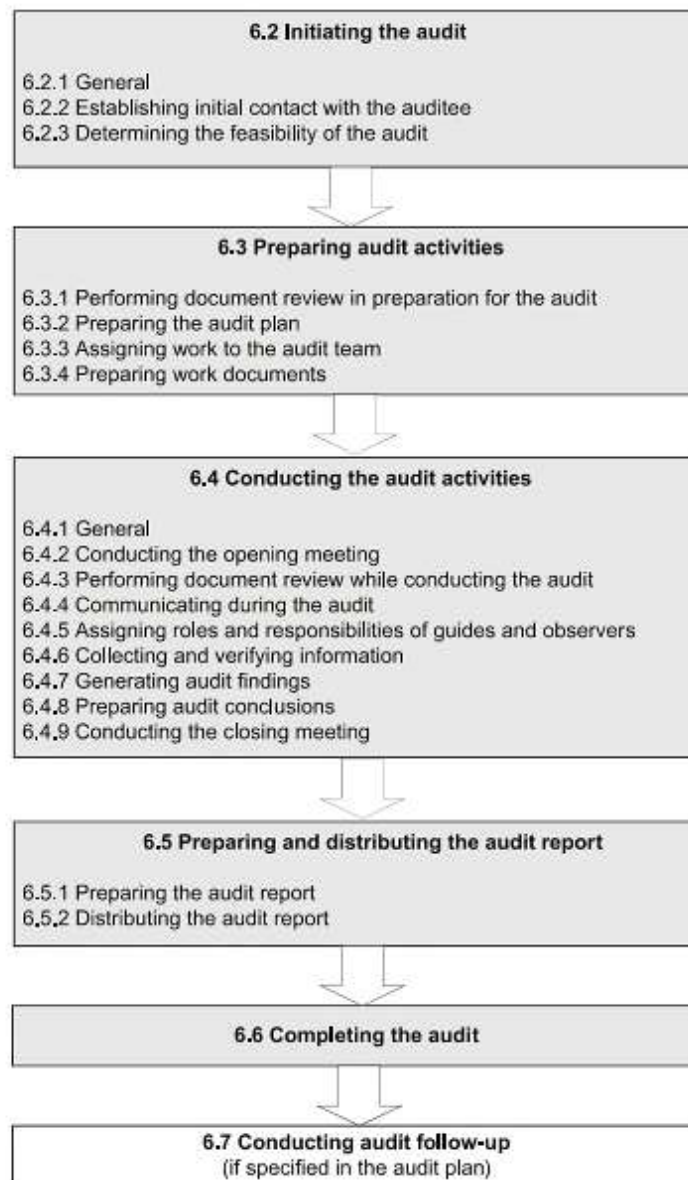


Figure 2: Audit activities overview (AS/NZS ISO 19011:2014). Subclause numbering refers to the relevant subclauses in the Standard.

2.1.1 Audit initiation and scope development

Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditee
- Confirm the audit team
- Confirm the audit purpose, scope and criteria.

On 12 June 2019 WolfPeak consulted with the Department, Transport for NSW, Sydney Water, NSW Rural Fire Service, the Office of Environment and Heritage, the Environment Protection Authority and Wollondilly Shire Council, to obtain their input into the scope of the IA in accordance with Section 3.2 of the IAPAR. The consultation records are presented in Appendix D.

A summary of the key issues and areas of focus raised by the stakeholders is presented in Table 1. The scope of the IA was reviewed following receipt of feedback from the stakeholders.

Table 1: Key issues and areas of focus raised during consultation

Stakeholder	Issues and areas of focus	How addressed
Department of Planning and Environment	No issues identified	-
Sydney Water	No response	-
Transport for NSW	No response	-
Rural Fire Service	Assess whether all relevant developments were referred to the NSW RFS for our comments, and to also determine the legislative context of each proposed development, noting that if a development is a Special Fire Protection Purpose under section 100B of the Rural Fires Act then it cannot be complying development (i.e. if section 100B applies to the project in question).	Outside of scope.
	Determining what, if any of our recommended conditions provided to the approval authority were adopted into an approval document.	Outside of scope.
	Ensuring that any adopted conditions in the approval were appropriately complied with throughout the construction and subsequent occupation phases of the development.	Included in scope for the current stage of works.
Office of Environment and Heritage	No issues identified	-
Environment Protection Authority	No response	-

Stakeholder	Issues and areas of focus	How addressed
Wollondilly Shire Council	Pedestrian Access during Construction – in reply to concerns raised by Council prior to commencement requesting footpaths along Wonga Road – the comments stated that there was no proposed pedestrian access to the school from Wonga Road – this is not the case. All pedestrian access during school hours is now via the gate at the back of the school off Wonga Road. The main entrance is locked for security reasons. Any students arriving late, visitors and students’ /parents for the support classes are all parking and accessing the school via Wonga Road. (SSD17_8640 Response to Submissions Table by Ethos Urban)	Included in scope
	The increased demand for parking near the school gate at the back of the school off Wonga Road has led to frustration and numerous complaints to Council from parents for the lack of infrastructure and forward thinking to provide a drop off zone. Again – Council were never made aware of the access point to the school being from Wonga Road during school hours or the need for access to the Support Classes from this road. The lack of footpath or even formed road at the end of Wonga road has led to safety concerns with the mixing of pedestrian and vehicle movements. Council has had to install “No Parking” signs around the informal turn circle on the unformed road to prevent parents double and triple parking in the area, blocking driveway access and creating a hazard to the many students who are now using this gate to gain access to their vehicles parked on Wonga Road.	Included in scope
	As construction of the bus bay and turn circle is due to commence shortly – Council is concerned with the interaction of road construction vehicles, pedestrians and parent drop off requirements to gain access to the gate off Wonga Road – putting further demand on Council to provide parking and pedestrian facilities. This should have been addressed as part of the development assessment.	Included in scope (excluding whether the assessment of the development was appropriate)
	Council have had to close and lock the gate on the unformed section of Wonga Road in the interest of public safety. Teachers, Contractors and visitors where using this space as an informal parking area - and access point to the Ag plot at the northern corner of the school site. The gate to the Ag plot is actually off an un- remediated tip site, and not road reserve – and as such is not to be used for access to the school site.	Included in scope

2.1.2 Preparing audit activities

The Auditor performed a document review, prepared an audit plan, and prepared work documents (audit checklists) and distributed to the Project team in preparation for the IA.

The primary documents reviewed prior to the site visit are as follows:

- *SSD 8640 Environmental Impact Statement, 480 Argyle St, Picton Picton High School Redevelopment, Ethos Urban, 04 April 2018 (the EIS)*
- *PICTON HIGH SCHOOL REDEVELOPMENT (SSD 17_8640) RESPONSE TO SUBMISSIONS, 30 October 2018, Ethos Urban (the RtS)*
- *PICTON HIGH SCHOOL RESPONSE TO SUBMISSIONS – RMS COMMENTS, 12 December 2018, Ethos Urban (the SRtS)*
- *Development Consent SSD 8640, 20 December 2019 (the Consent)*
- *Construction Environmental Management Plan Picton High School, SMEC, 5 April 2019 (the CEMP)*
- *Unexpected finds protocol*
- *Construction Traffic and Pedestrian Management Plan, Stantec, V1, 4 April 2019 (the CTPMSP)*
- *Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 5 March 2019 (the CNVMSP)*
- *Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (the CSWMSP)*
- *Aboriginal Cultural Heritage Management Sub Plan Lot 2 DP 520158 Picton High School Redevelopment, AMAC and Streat Archaeological, V3, March 2019 (the ACHMSP)*
- *Bushfire assessment Picton High School Redevelopment, Peterson Bushfire, 16 May 18 (the BfMP)*
- *Waste Management Plan Picton High School Redevelopment, SMEC, 27 February 2019 (the CWMSP)*
- *Community Communication Strategy Picton High School Redevelopment, April 2019, Schools Infrastructure NSW (the CCS)*

Audit checklists were reviewed and prepared. These comprised:

- Schedule 2 of SSD 8640 CoCs
- Select environmental management and mitigation measures as set out in the Project's CEMP, Sub-plans and CCS.

2.1.3 Site personnel involvement

The on-site audit activities took place on 4 June 2019. The following personnel took part in the audit:

- Michael Kavanagh – Senior Project Director – SINSW
- Carl Alderson – Operations Director - Mace Group
- Daniel Hogan – Senior Project Manager - Mace Group
- Mick Upston – Senior Project Manager – Taylor Construction
- Stephen Craig – Senior Design Manager – Taylor Construction
- Bradley Warren – Safety Advisor – Taylor Construction
- Derek Low – Auditor (WolfPeak).

Meetings

Opening and closing meetings were held with the Auditor and Project personnel.

During the opening meeting the objectives and scope of the IA, the resources required and methodology to be applied were discussed. At the closing meeting, preliminary audit findings must be presented, recommendations (if appropriate) must be made, and any post-audit actions were confirmed.

Interviews

The Auditor conducted interviews with key personnel involved in Project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development.

2.1.4 Site inspection

The on-site audit activities took place on 19 June 2019. The on-site audit activities included an inspection of the site and work activities. Photos are presented in Appendix F.

2.1.5 Document review

The IA included investigation and review of Project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The documents sighted are included with Appendices A and B.

2.1.6 Generating audit findings

IA findings were based on verifiable evidence. The evidence included:

- relevant records, documents and reports
- interviews of relevant site personnel
- photographs
- figures and plans; and
- site inspections of relevant locations, activities and processes.

Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the IAPAR, being:

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

Observations and notes may also be made to provide context, identify opportunities for improvement or highlight positive initiatives .

Evaluation of post approval documentation

The Auditor assessed whether post approval documents:

- have been developed in accordance with the CoCs and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate; and
- have been implemented in accordance with the CoCs and all other environmental licences and approvals applicable to the Project (if any).

The adequacy of post approval documents were determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document; and
- whether there are any opportunities for improvement.

2.1.7 Completing the audit

The IA Report was distributed to the proponent to check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented.

3. Audit findings

3.1 Approvals and documents audited and evidence sighted

The documents audited comprised all the conditions from Schedule 2 of SSD 8373 applicable to the works being undertaken, and selected mitigation measures and commitments from the following plans:

- CCS
- ACHMSP
- CEMP
- CTPMSP
- CNVMSP
- CWMSP
- CSWMP.

The evidence sighted against each requirement is detailed within Appendices A and B.

3.2 Compliance Status

This Section presents the findings of the June 2019 IA.

Section 4 presents a summary of the findings from this IA and actions proposed or undertaken in response to the findings. The Audit Checklists provided in Appendices A and B present details of all the evidence collected, observed and provided in support of a finding.

3.2.1 Summary

There were 109 CoCs and 26 CEMP and Sub-plan mitigation measures assessed.

14 non-compliances were identified against 16 CoCs. There were five non-compliances identified against the mitigation measures and commitments with the CCS, CEMP and Sub-Plans.

3.2.2 Details

Non-compliance against CoC A22

CoC A22 requires that, at least 48 hours before the commencement of construction, the Project must make Project plans, strategies, programs and reports (as they are obtained or approved) publicly available on its website. The website must be kept up to date.

At the time of the site inspection on 19 June 2019, the website presented only the CCS and no other documents. The website was updated subsequent to the findings and prior to finalisation of this report.

Non-compliance against CoC A23

CoC A23 require that the Project ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the CoCs relevant to activities they carry out.

Whilst the toolboxes being delivered on the Project are one method of communicating Project rules to the workforce, they are not comprehensive in their coverage of the consent. There was no evidence of a site induction or a subcontractor onboarding pack (or other medium) that demonstrates an instruction to comply with the consent.

Non-compliance against CoC B25

CoC B25 requires that a CEMP be prepared and address the information prescribed by the condition.

The CEMP does not include the following information as required by the condition:

- 24-hour contact details of the site manager (CoC B15 a) ii)
- a groundwater management plan (CoC B15 a) vi)
- details of outdoor lighting compliance with AS4282 (CoC B15 a vii)
- The CWMSP (CoC B15 d)).

Refer to Section 3.6.1 for the Auditors consideration of this standard condition.

Non-compliance against CoC B18 and CoC A11

CoC B18 requires that a CNVMSP be prepared and address the information prescribed by the condition. CoC B18 b) requires the CNVMSP include a procedures for achieving the Noise Management Levels (NMLs) from the Interim Construction Noise Guideline (ICNG). CoC B18 e) and f) require that the CNVMSP include details on how community consultation assisted in the development of strategies to manage high noise generating works. CoC A11 requires that evidence of consultation be included with the document to which it relates.

Section 5.1.2 of the CNVMSP identifies NMLs for non-residential properties as specified in the ICNG. The report does not include classrooms at schools and other educational institutions, or places of worship and these receivers exist adjacent or in proximity to the Project. The temporary school has not been identified as a receiver in the report, or had the applicable NML applied to it. The CNVMSP does not detail whether the noise penalties specified in the ICNG have been applied to the NMLs for potentially annoying noise characteristics.

Whilst the document states that consultation has occurred with affected receivers, there is no evidence to demonstrate that consultation helped inform the strategies to manage noise form the Project.

Non-compliance against CoC B19

CoC B19 requires that a CWMSMP be prepared and address the information prescribed by the condition, including details on waste quantities and processes for managing removal of hazardous materials.

The CWMSMP identifies the waste streams to be generated and the reuse, recycling and disposal options. The document does not identify the quantities of each waste type as these are determined at a later date. The CWMSMP does not include the details for the removal of hazardous materials. These are detailed within separate documents.

Non-compliance against CoC B20 and CoC A11

CoC B20 requires that a CSWMSMP be prepared in consultation with Council and address the information prescribed by the condition including details measures to manage stormwater under certain storm events. CoC A11 requires that evidence of consultation be included with the document to which it relates.

There is no information in the plan that details measures to be implemented under the 1:100 year ARI storm events.

There is no evidence that document was prepared in consultation with Council.

Non-compliance against CoC B21

CoC B21 requires that a ACHMSP be submitted to the Planning Secretary for approval prior to commencement of construction.

The document sighted at the time of the audit is still in draft. There was no evidence at the time of the audit to demonstrate that the document had been submitted to, and approved by, the Planning Secretary prior to commencement of construction.

Non-compliance against CoC B26

CoC B26 requires that prior to any clearing or construction works, 10 ecosystem credits must be purchased and retired to offset the removal of native vegetation on site. The ecosystem credits must be determined in accordance with the OEH's Framework for Biodiversity Assessment (FBA) and the Biobanking Assessment Methodology 2014 (BBAM).

The ecosystems credits were not retired prior to clearing or construction works. The Project submitted the application to submit into the Biodiversity Conservation Fund on 6 May 2019. On 13 May 2019 the OEH responded to advise that they required a statement of reasonable equivalence and resubmission (due to the implementation of the new OEH offsetting process). The updated application is currently in process.

Non-compliance against CoC B36

CoC B36 requires that, prior to the commencement of any footpath or public domain works, the streetscape design and treatments must be prepared to the satisfaction of the Certifying Authority.

There was no evidence at the time of the audit that the streetscape design and treatment had been prepared to the Certifying Authority's satisfaction.

Non-compliance against CoC C22

CoC C22 requires that all trees on the site must be suitably protected during construction as per recommendations of the Arboricultural Impact Assessment and the Tree Management Plan, prepared by Redgum Horticultural and dated 2 December 2018. If access to the Tree Protection Zones is required, then the works must be carried out under Arborist supervision.

The trees remaining on site were not protected in a manner consistent with the Arboricultural Impact Assessment or Tree Management Plan. The Project advised that works around the trees were current and that proper Tree Protection Zones would be re-established. There was no evidence at the time of the audit to demonstrate that guidance had been sought for works encroaching on Tree Protection Zones for the works undertaken.

Non-compliance against CoC C32 and CWMSP mitigation measures G12

CoC C32 requires that all waste generated during construction must be assessed, classified and managed in accordance with the EPA's Waste Classification Guidelines Part 1: Classifying Waste (2014).

Mitigation measure G12, within the CWMSP, states that waste would be managed and disposed of in accordance with the POEO Act and the WRAPP. Wastes that are unable to be reused or recycled would be disposed of offsite at a licensed waste management facility, or premises lawfully permitted to accept the materials following classification.

There was no evidence available at the time of the audit that material had been classified and managed in accordance with the waste classification guidelines and, therefore, disposed of to a facility lawfully permitted to receive it.

Non-compliance against CoC C35

CoC C35 requires that the requirements of the POEO Waste Regulation with particular reference to 'Part 7-Transportation and management of asbestos waste' must be complied with.

There was no evidence available at the time of the audit that Asbestos Containing Material had been appropriately disposed of in accordance with the POEO Waste Regulation.

Non-compliance against CoC C39

CoC C39 requires that no later than four weeks after the date notified for the commencement of construction, an Independent Audit Program must be submitted to the Department and the Certifying Authority.

The Audit Program was not submitted until 25 June 2019, approximately 6 weeks after commencement of construction.

Non-compliance against CCS Table 3: Advertising (print)

Table 3 of the CCS identifies that advertising in local newspapers will be undertaken with at least 7 days' notice of significant construction activities, major disruptions and opportunities to meet the project team.

There was no evidence at the time of the audit that advertising in McArthur Paper and Wollondilly Papers had occurred.

Non-compliance against CEMP Section 4.1

Section 4.1 of the CEMP commits to the delivery of a Project induction which covers all elements of the CEMP.

There was no evidence at the time of the audit of an induction being carried out.

Non-compliance against CWMSP mitigation measure G11

Mitigation measure G11, within the CWMSP, states that a waste register would be maintained, detailing types of waste collected, amounts, date/time and details of disposal.

No evidence was available at the time of the audit that a waste register was being maintained.

Non-compliance against ACHMSP Section 6

Section 6 of the ACHMSP recommends that consideration be given to RAPS recommendations on vegetation in the area including detailed survey, protection of flora, replanting of endemic species, and ongoing consultation on landscaping. Section 6 also recommends that all staff be briefed on the status of the area and responsibilities regarding cultural heritage items.

There was no evidence available at the time of the audit to demonstrate fulfilment of these commitments.

3.2.3 Corrective action requests and observations

There were six observations identified in relation to the CoC and the CNVMSP, CSWMSP and CWMP.

Observation in relation to CoC B17

CoC B17 requires that a CTPMSP be prepared and address the information prescribed by the condition.

The monitoring of traffic and pedestrian management (required by CoC B17 f)) is presented in the traffic section of the CEMP rather than in the CTPMSP.

Details on community consultation (required by CoC B17 g)) are included in the CCS rather than fleshed out in the CTPMSP. The Auditor considers this to be appropriate to avoid conflict.

Observation in relation to CoC B18 and CNVMSP Section 9

Section 9 of the CNVMSP provides an overview of the management approach when noise or vibration levels are predicted to exceed the applicable criteria. There is no detail provided as to how PHS would determine whether the predicted impact arising for a given activity would comply with the criteria or not (i.e.: there is no commitment to ongoing assessment through monitoring or modelling). Currently the Project team is consulting with the temporary school on potential impacts, based on their experience with construction rather than any quantitative measurement or prediction. The risk of this approach is the over or under servicing of mitigations in lieu of reliable data. It is recommended that the Project consider engagement of an acoustic consultant to assess various packages of work and therefore inform the decision-making tree in section 9 of the CNVMSP.

A single round of noise monitoring was carried out, despite the CNVMSP not committing to undertaking any. Pursuant to the observation above, it would be beneficial to the construction team if the CNVMSP provided greater guidance on when monitoring should be undertaken and how it should be undertaken (AS1055).

Observation in relation to CoC B20, C28 and CSWMSP Section 5.6

CoC B20 requires that a CSWMSP be prepared. Section 5.6 of the CSWMSP deals with discharging of waters and provides instructions on testing and discharge criteria. The instructions do not align with the requirement of CoC C28 which require EPA approval under the POEO Act for discharges of any water to the stormwater network. Refer to Section 3.6.2 regarding the Auditors consideration of CoC C28.

Observation in relation to CoC C18 and CNVMSP Sections 5.6 and 9.

CoC C18 requires that the Project vibration levels comply with the applicable structural damage criteria and human comfort criteria unless otherwise outlined in the CNVMSP (as per CoC C20).

The Project team indicated that vibration monitoring had occurred to inform them of vibration impacts on the Project boundary, yet there was no evidence to demonstrate that this was the case. The CNVMSP identifies the relevant vibration criteria in Section 5.2. Section 9 identifies a process by which deviations from the applicable criteria are to be managed. Refer response to CoC B18 (above) regarding the adequacy of the guidance presented in Section 9 of the CNVMSP.

Observation in relation to CoC C27

CoC C27 requires that only VENM, ENM, or other material approved in writing by EPA is brought onto the site and that accurate records be retained and readily available.

Whilst the Project team advised that no material had been imported to date, the requirements around importing of material are not detailed anywhere in the CEMP suite of documents.

Observation in relation to CWMS Section 7.1

Section 7.1 of the CWMS states that any person with management or control of a facility/workplace must ensure an asbestos register is maintained, to ensure the information in the register is up to date.

The register has not yet been updated following demolition and hazardous material removal.

3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents

The adequacy of post approval documents must be determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document; and
- whether there are any opportunities for improvement.

A review was conducted of the

- CCS
- CEMP
- CTPMSP
- CNVMSP
- CWMSP
- CSWMSP
- ACHMSP.

The documents are generally adequate, other than the matters identified in Sections 3.2.2 and 3.2.3.

3.4 Project's EMS

Taylor operate a Management System for the Project. In carrying out the audit, it was evident that the elements of AS/NZ ISO 14001-2016 Environmental Management Systems are being implemented. Evidence to support this include the documents sighted during the audit (detailed in Appendices A and B) and controls observed in the field.

3.5 Summary of notices from agencies

The Auditor is not aware of any notices served on the Project by agencies.

3.6 Other matters considered relevant by the auditor or DPE

3.6.1 Matters to be covered in the CEMP

As set out in Section 3.2.2, the CEMP does not include a groundwater management plan (CoC B15 a vi)), details of outdoor lighting compliance with AS4282 (CoC B15 a vii)) or the CWMSP (CoC B15 d)).

The Auditor notes in relation to this non-compliance:

- that the measures outlined in the CEMP and CSWMSP would prevent groundwater contamination and that the risk of interaction with groundwater is low. Refer EIS Appendix J for details on groundwater.
- the need to detail external lighting compliance would be redundant if the Project does not install outdoor lighting.
- the CWMSP has been prepared but it has not been attached to the CEMP.

A set out in Section 3.2.2, the CSWMSP does not details measures to be implemented under the 1:100 year ARI storm event as required by CoC B20. To note, the Managing Urban Stormwater series (i.e.: the Blue Books) which set out the processes for assessment and management of erosion and sediment control in NSW do not prescribe the assessment if 1:100 year ARI storm events. Additionally the EIS identified that a flood impact assessment 'Tahmoor Coal Flood Impact Assessment (Ref: 34252.02) by WRM, 3 December 2014' had been produced on behalf of Wollondilly Shire Council. This assessment identifies that the Project site does not experience flooding in major storm events.

3.6.2 Discharge of waters

The Auditor notes that CoC C28 requires that 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* (POEO Act).

The Project does not currently have the need to pump water off site. However this standard condition is problematic as the EPA is generally reluctant to licence non-scheduled activities unless otherwise justified by the applicant. This means that the Project must reuse all water captured on site or pay for it to be removed as liquid waste or tradewaste. The Auditor notes that Sydney Water are also typically reluctant to permit disposal of rainwater captured on construction sites to sewer due to potential risks associated with sediment loading.

Considering the supposed intention of this condition (to prevent the pollution of waters), the Auditor suggests the Project contact the Department to seek clarification as to whether discharges to stormwater without EPA approval are considered a contravention of the consent even if the discharges comply with S120 of the POEO Act (and do not result in the pollution of waters).

3.6.3 Issues raised by stakeholders during consultation on the audit scope

Rural Fire Service of NSW

The Rural Fire Service of NSW requested that the audit assess whether adopted conditions in the approval were appropriately complied with. Three conditions relating to fire are pertinent to the current audit period being CoC A18, A19 and B31. The remaining conditions relate to requirements needing to be satisfied prior to commencement of operations, or during operations.

CoC A18 relates to the construction of the science and math wings. The design and construction of the science and mathematics wing forms part of Construction Certificate 2 (CC2) and, therefore, was not triggered during the audit period.

CoC A19 relates to water, electricity and gas. The design and construction of utilities forms part of CC2 and, therefore, was not triggered during the audit period.

CoC B31 relates to the preparation of design plans for internal roadways. The design and construction of utilities forms part of CC2 and, therefore, was not triggered during the audit period.

Wollondilly Shire Council

Wollondilly Shire Council requested that the audit examine access arrangements to the Project as there had been complaints received by Council and perceived safety issues around design and layout.

Council stated that the Project detailed in the RtS that there was no proposed pedestrian access to the school from Wonga Road and they observed that this did not appear to be the case. Some students and staff are accessing the school via Wonga Road outside of the main pick up and drop off periods. The Auditor notes that the reference provided by Council relates to Project stating that there is no proposed pedestrian access to the school from Wonga Road for the redeveloped school. The commitment did not preclude the use of Wonga Road during construction. Out of hours access during construction is being provided via Wonga Road in limited cases. This is not the primary access point.

Council stated that there has been issues associated with increased parking demand on Wonga Road, and the lack of infrastructure on Wonga Road for pedestrians, parking and traffic movements. The parking and access for the site, as observed during the site inspection on 19 June 2019, was consistent with the layout presented in the CTPMSP. Council and RMS were consulted with in the preparation of the CTPMSP. The site visit also extended to approximate pick up times. There did not appear to be any issues on Wonga Road at that time. To note however, the church based on Wonga Road had some traffic associated with an event and their own traffic controllers in place.

Council expressed concern of the construction of the bus bay and turn circle and potential conflicts with pedestrians and vehicles on Wonga Road. The Project has submitted documentation to Council for their consideration which includes the stamped plans for the bus turning facility and Traffic Control Plans (which would separate or manage construction and pedestrian and vehicle movements). A Section 138 permit was granted by Council on 29 May 2019 to enable the works to be carried out, based on the information put forward by the Project (including design drawings and the CTPMSP).

3.7 Complaints

A complaints register is being maintained by the Project. The register is published on the Project website at

https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/p/picton-high-school/Complaints_register_PictonHS.pdf

At the time of writing, a total of two complaints were recorded since the commencement of works. These related to noise and dust and parking and access. Both were considered by the Project to be closed.

3.8 Incidents

The Project has not identified any incidents as defined by the Consent.

3.9 Actual versus predicted impacts

The audit considered the actual impacts arising from the carrying out of the Project (current works being site establishment, survey and investigations, hazardous materials removal and demolition) and whether they are consistent with the relevant impacts predicted in the EIS. A summary of the assessment is presented in Table 2.

Table 2: Summary of predicted versus actual impacts

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
Physical extent of the development in comparison with the approved boundary and any potential off-site impacts	The approved Project boundary is defined within the stamped plans listed under CoC A2.	The Project footprint is the same as that approved.	Y
Biodiversity	The Project would result in direct impact of 0.07ha of native vegetation and indirect impact of 0.46ha. The total number of ecosystem credits required is 8 credits for Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain (PCT849)..	The CoCs imposed 10 x ecosystem credits to be retired. Refer non-compliance against CoC B26. The application was resubmitted on 02 July 2019.	Y
Traffic and access	Minor and temporary disruptions to parking, traffic and access. No heavy vehicles to be parked beyond the Project boundaries.	All construction vehicles were confined to site. Heavy vehicle movements are minor and using approved routes.	Y
Noise and vibration	Moderate short term construction noise and vibration impacts on nearby receivers above the relevant Noise Management Levels and vibration criteria.	Noise and vibration impacts are occurring but appear to be generally consistent with that predicted.	Y
Soil and water	Minor and temporary impacts associated with construction erosion and sedimentation.	Erosion and sediment control measures being implemented on site appeared to be consistent with the Project Erosion and Sediment Control Plan. No issues. No fugitive dust was observed. The Project had a misting system and portable gervi available to manage dust. No issues	Y
Heritage	Negligible impact on aboriginal heritage items.	The Project has developed a ACHMSP, including an unexpected finds protocol. No finds have occurred to date.	Y
Contaminated land	There is no unacceptable risk associated with contamination and future land use, noting that asbestos containing materials and other	Works to date have involved removal of asbestos and related materials from building fabrics and equipment above the surface. The works appear to be	Y

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
	hazardous materials are present or likely to be present and should be removed or further investigated.	carried out in accordance with the relevant codes of practice other than the non-compliances and observations made in Sections 3.2.2 and 3.3.3.	
Flooding	Negligible flood risk	No issues	Y
Waste	The construction of the Project would generate general demolition and construction waste, green waste, contaminated fill, VENM and office waste	The works to date would generate these types of waste. Refer to the non-compliances and observation in relation to waste classification and disposal in Section 3.2.2 and 3.2.3.	Y
Bushfire	The Project is subject to a low bushfire risk	The audited Project did not appear to be different to that assessed. Refer Section 3.6.1 for relevance of compliance with bushfire related conditions.	Y

4. Actions

Item	Cond No	Type	Details of item	Proposed or completed action by the auditee	By whom and by when	Status
JUNE 2019 AUDIT FINDINGS						
Conditions of Consent SSD 8640 Schedule 2						
1	CoC A22	Non-compliance	<p>CoC A22 requires that at least 48 hours before the commencement of construction, the Project must make Project plans, strategies, programs and reports (as they are obtained or approved) publicly available on its website. The website must be kept up to date.</p> <p>At the time of the site inspection on 19/06/19, the website presented only the CCS and no other documents. The website was updated subsequent to the findings and prior to finalisation of this report.</p>	NA	NA	CLOSED
2	CoC A23	Non-compliance	<p>CoC A23 require that the Project 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.</p> <p>Whilst the toolboxes being delivered on the Project are one method of communicating Project rules to the workforce, they are no comprehensive. There was no evidence of a site induction or a subcontractor onboarding pack (or other medium) that demonstrates an instruction to comply with the consent.</p>	Provide copies of site induction and sub-contractor on boarding to Independent Auditor	By SINSW Project Team by 31 July 2019	OPEN
3	CoC B15	Non-compliance	<p>CoC B25 requires that a CEMP be prepared and address the information prescribed by the condition.</p> <p>The CEMP does not include the following information as required by the condition:</p> <ul style="list-style-type: none"> - 24-hour contact details of the site manager (CoC B15 a) ii)), - a groundwater management plan (CoC B15 a) vi)) 	Provide the required information, managements plans and lighting compliance details to Independent Auditor, the	By SINSW Project Team by 31 July 2019	OPEN

			<ul style="list-style-type: none"> - details of outdoor lighting compliance with AS4282 (CoC B15 a vii) - The CWMS (CoC B15 d)). <p>The Auditor notes:</p> <ul style="list-style-type: none"> - that the measures outlined in the CEMP and CSWMS would prevent groundwater contamination and that the risk of interaction with groundwater is low. Refer EIS Appendix J for details on groundwater. - the need to detail external lighting compliance would be redundant if the Project does not install outdoor lighting. - The CWMS has been prepared but it has not been attached to the CEMP. 	Certifying Authority and the Department.		
4	CoC B17	Observation	<p>The monitoring of traffic and pedestrian management (required by CoC B17 f)) is presented in the traffic section of the CEMP rather than in the CTPMS.</p> <p>Details on community consultation (required by CoC B17 g)) are included in the CCS rather than fleshed out in the CTPMS. The Auditor considers this to be appropriate.</p>	Noted as appropriate	-	CLOSED
5	CoC B18 (and CoC A11)	Non-compliance	<p>CoC B18 requires that a CNVMS be prepared and address the information prescribed by the condition.</p> <p>CoC B18 b) requires the CNVMS include a procedures for achieving the noise management levels from the Interim Construction Noise Guideline (ICNG).</p> <p>Section 5.1.2 of the CNVMS identifies noise criteria for non-residential properties as specified in the ICNG. The report does not include classrooms at schools and other educational institutions, or places of worship given that these receivers exist adjacent or in proximity to the Project. The temporary school has not been identified as a receiver in the report, or had the applicable NML applied to it.</p> <p>The CNVMS does not detail whether the noise penalties specified in the ICNG have been applied to the NMLs for potentially annoying noise characteristics.</p> <p>CoC B18 e) and f) require that the CNVMS include details on how community consultation assisted in the development of strategies to</p>	CNVMS to be updated as specified and submit to Independent Auditor, the Certifying Authority and the Department.	By SINSW Project Team by 31 July 2019	OPEN

			<p>manage high noise generating works. CoC A11 requires that evidence of consultation be included with the document to which it relates.</p> <p>Whilst the document states that consultation has occurred with affected receivers, but there is no evidence to demonstrate that consultation helped inform the strategies to manage noise form the Project.</p>			
6	CoC B18 (and CNVMSP Section 9)	Observation	<p>Section 9 of the CNVMSP provides an overview of the management approach when noise or vibration levels are predicted to exceed the applicable criteria. There is no detail provided as to how PHS would determine whether the predicted impact arising for a given activity would comply with the criteria or not (i.e.: there is no commitment to ongoing assessment through monitoring or modelling). Currently the Project team is consulting with the temporary school on potential impacts, based on their experience with construction rather than any quantitative measurement or prediction. The risk of this approach is the over or under servicing of mitigations in lieu of reliable data. It is recommended that the Project consider engagement of an acoustic consultant to assess various packages of work and therefore inform the decision making tree in section 9 of the CNVMSP.</p> <p>A single round of noise monitoring was carried out, despite the CNVMSP not committing to undertaking any. Pursuant to the observation above, it would be beneficial to the construction team if the CNVMSP provided greater guidance on when monitoring should be undertaken and how it should be undertaken (AS1055).</p>	CNVMSP to be updated as specified and submit to Independent Auditor, the Certifying Authority and the Department.	By SINSW Project Team by 31 July 2019	OPEN
7	CoC B19	Non-compliance	<p>CoC B19 requires that a CWMSPP be prepared and address the information prescribed by the condition, including details on waste quantities and processes for managing removal of hazardous materials.</p> <p>The CWMSPP identifies the waste streams to be generated and the reuse, recycling and disposal options. The document does not identify the quantities of each waste type as these are determined at a later date.</p> <p>The CWMSPP does not include the details for the removal of hazardous materials. These are detailed within separate documents.</p>	CWMSPP to be updated as specified and submit to Independent Auditor, the Certifying Authority and the Department.	By SINSW Project Team by 31 July 2019	OPEN

8	CoC B20 (and CoC A11)	Non-compliance	<p>CoC B20 requires that a CSWMSP be prepared in consultation with Council and address the information prescribed by the condition including details measures to manage stormwater under certain storm events. CoC A11 requires that evidence of consultation be included with the document to which it relates.</p> <p>There is no evidence that document was prepared in consultation with Council.</p> <p>There is no information in the plan that details measures to be implemented under the 1:100 year ARI storm events. To note, the Managing Urban Stormwater series (i.e.: the Blue Books) which set out the processes for assessment and management of erosion and sediment control in NSW do not prescribe the assessment if 1:100 year ARI storm events.</p>	CSWMSP to be updated as specified and submit to Independent Auditor, the Certifying Authority and the Department.	By SINSW Project Team by 31 July 2019	OPEN
9	CoC B20 (and CSWMSP Section 5.6)	Observation	Section 5.6 of the CSWMSP deals with discharging of waters and provides instructions on testing and discharge criteria. The instructions do not align with the requirement of CoC C28 which require EPA approval under the POEO Act.	CSWMSP to be updated as specified and submit to Independent Auditor, the Certifying Authority and the Department.	By SINSW Project Team by 31 July 2019	OPEN
10	CoC B21	Non-compliance	<p>CoC B21 requires that a ACHMSP be submitted to the Planning Secretary for approval prior to commencement of construction.</p> <p>The document sighted at the time of the audit is still in draft. There was no evidence at the time of the audit to demonstrate that the document had been submitted to, and approved by, the Planning Secretary prior to commencement of construction.</p>	Final ACHMSP submitted to Planning Secretary for approval on 10 July 2019. Planning Secretary determination expected within 3 weeks in accordance with MOU between DPIE and SINSW	By SINSW Project Team by 31 July 2019	OPEN
11	CoC B26	Non-compliance	CoC B26 requires that prior to any clearing or construction works, 10 ecosystem credits must be purchased and retired to offset the removal of native vegetation on site. The ecosystem credits must be determined in	An Application for Assessment of a Reasonable	By SINSW Project Team by 27 September 2019	OPEN

			<p>accordance with the OEH's Framework for Biodiversity Assessment (FBA) and the Biobanking Assessment Methodology 2014 (BBAM).</p> <p>The ecosystems credits were not retired prior to clearing or construction works. The Project submitted the application to submit into the Biodiversity Conservation Fund (BCF) on 06/05/19. On 13/05/19 the OEH responded to advise that they required a statement of reasonable equivalence and resubmission (due to the implementation of the new OEH offsetting process). The updated application is currently in process.</p>	<p>Equivalence of Biodiversity Credits was submitted to OEH on 1 July 2019. A response is yet to be received by SINSW with a follow up enquiry submitted to OEH on 10 July 2019. Once Equivalence is advised, the application to submit into the Biodiversity Conservation Fund will be resubmitted to OEH who will issue an invoice to SINSW allowing payment into the BCF.</p>	<p>pending responses by OEH</p>	
12	CoC B36	Non-compliance	<p>CoC B36 requires that, prior to the commencement of any footpath or public domain works, the streetscape design and treatments must be prepared to the satisfaction of the Certifying Authority.</p> <p>There was no evidence at the time of the audit that the streetscape design and treatment had been prepared to the Certifying Authority's satisfaction.</p>	<p>Evidence of submission and Certifying Authority satisfaction to be provided to Independent Auditor</p>	<p>By SINSW Project Team by 31 July 2019</p>	OPEN
13	CoC C18	Observation	<p>CoC C18 requires that the Project vibration levels comply with the applicable structural damage criteria and human comfort criteria unless otherwise outlined in the CNVMSP (as per CoC C20).</p> <p>The Project indicated that vibration monitoring had occurred, yet there was no evidence to demonstrate that this was the case.</p> <p>The CNVMSP identifies the relevant criteria in Section 5.2. Section 9 identifies a process by which deviations from the applicable criteria are to</p>	<p>Evidence of monitoring will be collated and kept on site</p>	<p>By SINSW on and ongoing basis.</p>	OPEN

			be managed. Refer response to CoC B18 regarding the adequacy of the guidance presented in Section 9 of the CNVMSP.			
14	CoC C22	Non-compliance	<p>CoC C22 requires that all trees on the site must be suitably protected during construction as per recommendations of the report titled Report: A) Arboricultural Impact Assessment and B) Tree Management Plan, prepared by Redgum Horticultural and dated 2 December 2018; and if access to the Tree Protection Zones is required, then the works be carried out under Arborist supervision.</p> <p>The trees remaining on site were not protected in a manner consistent with the Arboricultural Impact Assessment or Tree Management Plan, prepared by Redgum Horticultural. The Project advised that works around the trees were current and that proper Tree Protection Zones would be re-established. There was no evidence at the time of the audit to demonstrate that guidance had been sought for works encroaching on Tree Protection Zones.</p>	All trees remaining on site to be protected in accordance with recommendations	By SINSW Project Team by 31 July 2019	OPEN
15	CoC C27	Observation	<p>CoC C27 requires that only VENM, ENM, or other material approved in writing by EPA is brought onto the site and that accurate records be retained and readily available.</p> <p>Whilst no material had been imported to date, the requirements around importing of material is not detailed anywhere in the CEMP suite of documents.</p>	The CEMP suite of documents to be updated to address requirements for importation of material. Once updated the CEMP suite of document are to be submitted to the Independent Auditor, Certifying Authority and the Department.	By SINSW Project Team by 31 July 2019	OPEN
16	CoC C28 (and CSWMSP Section 5.6)	Observation	<p>CoC C28 requires that 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 POEO Act.</p> <p>The Project has yet to pump any water off site.</p>	CSWMSP to be updated as specified and submit to Independent Auditor, the Certifying Authority	By SINSW Project Team by 31 July 2019	OPEN

			<p>This standard condition is problematic as the EPA is generally reluctant to licence non-scheduled activities unless otherwise justified by the applicant. This means that the Project must reuse all water captured on site or pay for it to be removed as liquid waste or tradewaste. The auditor notes that generally Sydney Water are also reluctant to permit disposal of rainwater captured on construction sites to sewer due to sediment loading.</p> <p>Considering the supposed intention of this condition (to prevent the pollution of waters), the auditor suggests the Project contact the Department to seek clarification as to whether discharges to stormwater without EPA approval are considered a contravention of the consent even if the discharges comply with S120 of the POEO Act (and do not result in the pollution of waters).</p> <p>Additionally the CSWMSP does not reflect this condition. Refer response to CoC B20.</p>	and the Department.		
17	CoC C32 (and CWMSP G12)	Non-compliance	<p>CoC C32 requires that all waste generated during construction must be assess, classified and managed in accordance with the EPA's Waste Classification Guidelines Part 1: Classifying Waste (2014).</p> <p>Mitigation measure G12, within the CWMSP, states that waste would be managed and disposed of in accordance with the POEO Act and the WRAPP. Wastes that are unable to be reused or recycled would be disposed of offsite at a licensed waste management facility, or premises lawfully permitted to accept the materials following classification.</p> <p>There was no evidence available at the time of the audit that material had been classified and managed in accordance with the waste classification guidelines and, therefore, disposed of to a facility lawfully permitted to receive it.</p>	Evidence of waste material classification and disposal to a facility lawfully permitted to receive it to be submitted to the Independent Auditor	By SINISW Project Team by 31 July 2019	OPEN
18	CoC C35	Non-compliance	<p>CoC C35 requires that the requirements of the POEO Waste Regulation with particular reference to 'Part 7-Transportation and management of asbestos waste' must be complied with.</p> <p>There was no evidence available at the time of the audit that Asbestos Containing Material had been appropriately disposed of in accordance with the POEO Waste Regulation.</p>	Evidence of Asbestos Containing Material being disposed in accordance with POEO Waste Regulations to be submitted to the	By SINISW Project Team by 31 July 2019	OPEN

				Independent Auditor		
19	CoC C39	Non-compliance	<p>CoC C39 requires that no later than four weeks after the date notified for the commencement of construction, an Independent Audit Program must be submitted to the Department and the Certifying Authority.</p> <p>The Audit Program was not submitted until 25/06/19, approximately 6 weeks after commencement of construction.</p>	NA	NA	CLOSED
20	CCS Table 3: Advertising (print)	Non-compliance	<p>Table 3 of the CCS identifies that advertising in local newspapers will be undertaken with at least 7 days' notice of significant construction activities, major disruptions and opportunities to meet the project team.</p> <p>There was no evidence at the time of the audit that advertising in McArthur Paper and Wollondilly Papers had occurred.</p>	Evidence of advertising regarding community consultation to be submitted to the Independent Auditor	By SINSW Project Team by 31 July 2019	OPEN
21	CEMP Section 4.1	Non-compliance	<p>Section 4.1 of the CEMP commits to the delivery of a Project induction which covers all elements of the CEMP.</p> <p>There was no evidence at the time of the Audit of an induction being carried out.</p>	Evidence of inductions addressing the CEMP requirements to be submitted to the Independent Auditor	By SINSW Project Team by 31 July 2019	OPEN
22	CWMSP Section 7.1	Observation	<p>Section 7.1 of the CWMSP states that any person with management or control of a facility/workplace must ensure an asbestos register is maintained, to ensure the information in the register is up-to-date.</p> <p>The register has not been updated following demolition and hazardous material removal.</p>	Asbestos Register to be updated	By SINSW Project Team by 31 July 2019	OPEN
23	CWMSP G11	Non-compliance	<p>Mitigation measure G11, within the CWMSP, states that a waste register would be maintained, detailing types of waste collected, amounts, date/time and details of disposal.</p>	CWMSP to be updated and submitted to the Independent Auditor, Certifying	By SINSW Project Team by 31 July 2019	OPEN

			No evidence was available at the time of the audit that a waste register was being maintained.	Authority and the Department		
24	ACHMSP Section 6	Non-compliance	<p>Section 6 of the ACHMSP recommends that consideration be given to RAPS recommendations on vegetation in the area including detailed survey, protection of flora, replanting of endemic species, and ongoing consultation on landscaping. Section 6 also recommends that all staff be briefed on the status of the area and responsibilities regarding cultural heritage items.</p> <p>There was no evidence available at the time of the audit to demonstrate fulfilment of these commitments.</p>	Evidence of fulfilment of commitments recommended in ACHMSP be submitted to Independent Auditor	By SINSW Project Team by 31 July 2019	OPEN

5. Conclusions

The overall outcome of the IA was positive. The majority of compliance records were organised and available at the time of the site inspection and interview with PHS personnel on 19 June 2019.

Relevant environmental and compliance monitoring records are being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements.

There were 109 CoCs and 26 CEMP and Sub-plan mitigation measures assessed. 13 non-compliances were identified against 16 CoCs. There were five non-compliances identified against the mitigation measures and commitments with the CCS, CEMP and Sub-Plans. The non-compliances predominantly related to omissions of required information within Project documentation, or records not being available at the time of the audit.

There were six observations identified in relation to the CoCs and the Construction Noise and Vibration Management Sub-Plan, Construction Soil and Water Management Sub-Plan and the Construction Waste Management Sub-Plan. These observations related to the adequacy of the documentation.

Detailed findings are presented in Section 3. Actions proposed by the Project team to address the findings of this IA are set out in Section 4.

The overall outcome of the IA was indicative of a good degree of compliance and environmental performance by SINSW, Mace and Taylor. The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the IA.

6. Limitations

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Appendix A. SSD 8640 Conditions of Consent

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status																																																																
Schedule 2																																																																				
Part A Administrative conditions																																																																				
Obligation to Minimise Harm to the Environment																																																																				
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development.	The documents referred to elsewhere in this Audit Table Site inspection	The Project is implementing reasonable and feasible measures to prevent or minimise harm on the environment	Compliant																																																																
Terms of Consent																																																																				
A2	<p>The development may only be carried out:</p> <ol style="list-style-type: none"> in compliance with the conditions of this consent; in accordance with all written directions of the Planning Secretary; generally, in accordance with the EIS and Response to Submissions; in accordance with the approved plans in the table below: <table border="1" data-bbox="309 831 896 1236"> <thead> <tr> <th colspan="4">Architectural Plans prepared by Ballard Leuca Partnership</th> </tr> <tr> <th>Dwg No.</th> <th>Rev</th> <th>Name of Plan</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>AA03-0002</td> <td></td> <td>Site Context Plan</td> <td>30/08/2018</td> </tr> <tr> <td>SSD-AA10-0001</td> <td></td> <td>GA – Lower Ground Floor Plan – Zone A</td> <td>04/08/2018</td> </tr> <tr> <td>SSD-AA10-0002</td> <td></td> <td>GA – Lower Ground Floor Plan – Zone B</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA10-0003</td> <td></td> <td>GA – Lower Ground Floor Plan – Zone C</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA10-0004</td> <td></td> <td>GA – Lower Ground Floor Plan – Zone D</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA10-0101</td> <td></td> <td>GA – Ground Floor Plan – Zone A</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA10-0102</td> <td></td> <td>GA – Ground Floor Plan – Zone B</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA10-0103</td> <td></td> <td>GA – Ground Floor Plan – Zone C</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA10-0104</td> <td></td> <td>GA – Ground Floor Plan – Zone D</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA10-0201</td> <td></td> <td>GA – First Floor Plan – Zone A</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA10-0202</td> <td></td> <td>GA – First Floor Plan – Zone B</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA20-0001</td> <td></td> <td>Elevations – General Arrangement – Science & Maths, Visual Arts, Design & Technology</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA20-0002</td> <td></td> <td>Elevations – General Arrangement – Admin & Student Hub</td> <td>27/07/2018</td> </tr> <tr> <td>SSD-AA20-0003</td> <td></td> <td>Elevations – General Arrangement – Fitness & Performance</td> <td>27/07/2018</td> </tr> </tbody> </table>	Architectural Plans prepared by Ballard Leuca Partnership				Dwg No.	Rev	Name of Plan	Date	AA03-0002		Site Context Plan	30/08/2018	SSD-AA10-0001		GA – Lower Ground Floor Plan – Zone A	04/08/2018	SSD-AA10-0002		GA – Lower Ground Floor Plan – Zone B	27/07/2018	SSD-AA10-0003		GA – Lower Ground Floor Plan – Zone C	27/07/2018	SSD-AA10-0004		GA – Lower Ground Floor Plan – Zone D	27/07/2018	SSD-AA10-0101		GA – Ground Floor Plan – Zone A	27/07/2018	SSD-AA10-0102		GA – Ground Floor Plan – Zone B	27/07/2018	SSD-AA10-0103		GA – Ground Floor Plan – Zone C	27/07/2018	SSD-AA10-0104		GA – Ground Floor Plan – Zone D	27/07/2018	SSD-AA10-0201		GA – First Floor Plan – Zone A	27/07/2018	SSD-AA10-0202		GA – First Floor Plan – Zone B	27/07/2018	SSD-AA20-0001		Elevations – General Arrangement – Science & Maths, Visual Arts, Design & Technology	27/07/2018	SSD-AA20-0002		Elevations – General Arrangement – Admin & Student Hub	27/07/2018	SSD-AA20-0003		Elevations – General Arrangement – Fitness & Performance	27/07/2018	<p>Approved Plans stamped plans observed 19/6/19 on site.</p> <p>Documents as referred to as evidence elsewhere in this Audit Table</p>	<p>Compliance Is verified in part through this independent audit process</p> <p>No directions were received from the Secretary.</p>	Compliant
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Unique ID	Compliance requirement				Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	Landscape Plans prepared by Arcadia Landscape Architecture						
	Dwg No.	Rev	Name of Plan	Date			
		B	Vision Landscape Masterplan	February 2018			
		C	Cultural + Heritage Items	May 2018			
		C	Landscape Sections	May 2018			
		C	Landscape Sections – Section A-A	May 2018			
		C	Landscape Sections – Section B-B	May 2018			
		C	Landscape Sections – Section C-C	May 2018			
		B	Materials Pavement	February 2018			
		B	Materials Pavement	February 2018			
		B	Detail Entry Forecourt	February 2018			
		B	Materials Entry Forecourt	February 2018			
		B	Detail Terraced Lawns	February 2018			
		B	Materials Terraced Lawns	February 2018			
		B	Detail Social Hub	February 2018			
		B	Materials Social Hub	February 2018			
		B	Detail Educational Trail	February 2018			
		B	Materials Educational Trail	February 2018			
		B	Details Agricultural & Environmental Learning	February 2018			
		B	Vision Natural Trail	February 2018			
		B	Softscape Planting Character	February 2018			
		B	Softscape Tree size specification & Formal Softscape Areas	February 2018			
	SSD-SK	0002	Front entry – Landscaping and Security	27/07/2018			
		D	Approach Tree Retention + Removal Strategy	October 2018			
	Concept stormwater, sediment and erosion control plan prepared by Bonacc						
	Dwg No.	Rev	Name of Plan	Date			
	C030	P5	Concept Stormwater Management Plan	22/02/2018			
	C005	P2	Concept Sediment and Erosion Control Plan	22/02/2018			
	C007	P1	Sediment and Erosion Control Details	09/02/2018			

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and (b) the implementation of any actions or measures contained in any such document referred to in (a) above.	Interview with auditees	No directions were received from the Secretary.	Not triggered
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict	None	Noted	Compliant
Limits of Consent				
A5	This consent lapses five years after the date of consent unless the works associated with the development have physically commenced.	Notice of commencement under CoC B1 submitted 18/4/19 and again on 7/5/19.	Works commenced 10/5/19	Compliant
Prescribed Conditions				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A6	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	Part 6, Division 8A of the EPAA CC1 P217_007-2, 16/4/19 Site signage	Part 6, Division 8A of the EPAA relates to prescribed conditions for: <ul style="list-style-type: none"> - compliance with the BCA (CC1 P217_007-2, 16/4/19) - erection of signs - residential building work (not relevant) - entertainment venues (not relevant) - signage for max number of persons (not relevant for construction) - shoring and adjoining properties (no properties are adjoined to the Project). 	Compliant
Planning Secretary as Moderator				
A7	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties	Interview with auditees	No disputes	Not triggered
Long Service Levy				
A8	For work costing \$25,000 or more, a Long Service Levy must be paid. For further information please contact the Long Service Payments Corporation Helpline on 131 441	LSL receipt to Wollondilly Shire Council 3/9/18	LSL levy paid.	Compliant
Legal Notices				
A9	Any advice or notice to the consent authority must be served on the Planning Secretary.	Interview with auditees	No legal notices served.	Not triggered
Student Numbers				
A10	The student number is not to exceed 1,580 as referenced in the Environmental Impact Statement (V5) prepared by Ethos Urban dated 18 October 2018 and Traffic and Accessibility Impact Assessment prepared by TDG dated August 2018.	Interview with auditees	Current expectation is less than 1580. Not relevant to current audit period	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
Evidence of Consultation				
A11	Where conditions of this consent require consultation with an identified party, the Applicant must: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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. 	Refer response to CoC B18 and B20	Non-compliance: there was no evidence provided at the time of the audit to demonstrate that the NVMSMSP and CWSMSP had been consulted on with the identified stakeholders.	Non-compliance
Staging, Combining and Updating Strategies, Plans or Programs				
A12	With the approval of the Planning Secretary, the Applicant may: <ul style="list-style-type: none"> a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). 	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages.	Compliant
A13	If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Interview with auditees. Plans, programs and strategies evidenced elsewhere in this Audit Table	The documents prepared address the works being undertaken. The need for review will occur prior to stage 2 of construction.	Not triggered.
A14	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program	Interview with auditees. Plans, programs and strategies evidenced elsewhere in this Audit Table	The documents prepared address the works being undertaken. The need for review will occur prior to stage 2 of construction.	Not triggered.
Demolition				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A15	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	Demolition swms 6767 Demolition sequence 181019 Walan demolition works plan 08/04/19 Tree removal plans 190404 AA020001 CC1 P217_007-2, 16/4/19	The walan demolition works plan are prepared by the demolition contractor WHS Manager details compliance with AS2601. It is complemented by work method statements. CC1 issued by CA 16/04/19.	Compliant
Structural Adequacy				
A16	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA and any additional requirements of the Subsidence Advisory NSW where the building or structure is located on land within a declared Mine Subsidence District. <i>Notes:</i> <ul style="list-style-type: none"> • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. • Under section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of Subsidence Advisory NSW's approval before carrying out certain development in a Mine Subsidence District 	Interview with auditees	There have been no new buildings and structures, nor any alterations or additions to existing buildings and structures undertaken during the audit period.	Not triggered
External Walls and Cladding				
A17	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA	Interview with auditees	The audit period covers site establishment works and demolition only. Design of external walls and cladding to be addressed as part of CC2.	Not triggered
Design and Construction for Bush Fire				
A18	The construction of entire science and mathematics wing, up to an internal fire rated wall must comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2009 <i>Construction of buildings in bushfire-prone areas</i> or NASH Standard (1.7.14 updated) <i>National Standard Steel Framed Construction in Bushfire Areas – 2014</i> as appropriate and section A3.7 Addendum Appendix 3 of <i>Planning for Bush Fire Protection 2006</i> .	Interview with auditees	The audit period covers site establishment works and demolition only. The design and construction of the science and mathematics wing forms part of CC2.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A19	Water, electricity and gas are to comply with sections 4.1.3 and 4.2.7 of <i>Planning for Bush Fire Protection 2006</i> .	Interview with auditees	The audit period covers site establishment works and demolition only. The design and construction of utilities forms part of CC2.	Not triggered
Applicability of Guidelines				
A20	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	The documents referred to elsewhere in this Audit Table	The documents prepared under the consent appear to refer to the standards and guidelines that are applicable to the document to which they relate.	Compliant
Monitoring and Environmental Audits				
A21	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, noncompliance notification, compliance reporting and independent auditing. <i>Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i>	Part 9, Div 9.4 of the EPAA Acoustic Logic Noise monitoring report 20190515.3/0506A/RO/JM This audit	The relevant section of the EPAA relates to (among other things) the need to be accurate, true (not misleading), properly conducted (approved methodology, calibrated etc) and with records retained. The noise monitoring report presents the information in accordance with these requirements. This Audit has been carried out with regard to these requirements.	Compliant
Access to Information				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A22	<p>At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <p>a) (a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <ul style="list-style-type: none"> i. the documents referred to in condition A2 of this consent; ii. all current statutory approvals for the development; iii. all approved strategies, plans and programs required under the conditions of this consent; iv. regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent; v. a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; vi. a summary of the current stage and progress of the development; vii. contact details to enquire about the development or to make a complaint; viii. a complaints register, updated monthly; ix. audit reports prepared as part of any independent environmental audit of the development and the Applicant's response to the recommendations in any audit report; x. any other matter required by the Planning Secretary; and <p>b) keep such information up to date, to the satisfaction of the Planning Secretary.</p>	<p>https://www.schoolinfrastructure.nsw.gov.au/projects/p/pi-cton-high-school.html</p>	<p>Non-compliance: At the time of the audit the website did not present the Staging Strategy, Complaints Register, Community Communications Strategy or the CEMP and sub-plans.</p> <p>The website has since been updated.</p>	<p>Non-compliant</p>
<p>Compliance</p>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A23	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development	TBT 05/03/19 – 13/06/19	<p>Toolbox talks are being carried out regularly which communicate risk and controls and relevant requirements of the consent.</p> <p>Non-compliance: Whilst the toolboxes are one method of communicating project rules to the workforce, they are no comprehensive. There was no evidence of a site induction or a subcontractor onboarding pack (or other medium) that demonstrates instruction to comply with the consent.</p>	Non-compliant
ADVISORY NOTES				
AN1	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain , renew or comply with such licences, permits, approvals and consents.	ROL 201.2019.0000024.001	A road occupancy licence has been obtained for Wonga Rd.	Compliant
PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION				
Notification of Commencement				
B1	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.	Notice of commencement under CoC B1 submitted 18/4/19 and again on 7/5/19.	Works commenced 10/5/19	Compliant
Certified Drawings				
B2	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with: <ul style="list-style-type: none"> a) the relevant clauses of the BCA; and b) this development consent. 	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
External Walls and Cladding				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B3	Prior to the commencement of construction, the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA. The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it.	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Landscaping				
B4	Prior to the commencement of construction, the Applicant must (a) revise the landscape plan to include additional 14 super advanced canopy trees, with a minimum 100L pot size. The location of the additional canopy trees is to be planted at the edges of the site boundaries. The tree species must be selected from the Grey Box – Forest Red Gum Grassy woodland on flats of the Cumberland Plain vegetation. (b) Revise the landscape plan to include soft landscaping on either side of the proposed security fence.	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
B5	The revised landscape plan must be submitted to the Planning Secretary and the Certifying Authority for information.	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Protection of Public Infrastructure				
B6	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 to the Certifying Authority and Council.	Dilapidation reports 190215 and 090314 Submission to Council and CA 190417 CC1 P217_007-2, 16/4/19	No service provider services impacted. Dilapidation reports undertaken and submitted to relevant stakeholders.	Compliant
Unexpected Contamination Procedure				
B7	Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition B15 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.	CEMP Appendix D Unexpected finds event 17/6/19	The unexpected finds procedure is included in the CEMP and is being implemented on site.	Compliant
Utilities and Services				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B8	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Interview with auditees	No service provider utility works have occurred during the audit period.	Not triggered.
B9	Prior to the commencement of above ground works written advice must be obtained from the electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.	Interview with auditees	No above ground utility or service works have occurred during the audit period.	Not triggered.
Community Communication Strategy				
B10	<p>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.</p> <p>The Community Communication Strategy must:</p> <ol style="list-style-type: none"> 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 community-based forums, if required, that focus on key environmental management issues for the development; d) set out procedures and mechanisms: <ol style="list-style-type: none"> 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 iii. to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation. <p>The Community Communication Strategy must be submitted to the Planning Secretary for approval no later than two weeks before the commencement of any work.</p> <p>Work for the purposes of the development must not commence until the Community Communication Strategy has been approved by the Planning Secretary, or within another timeframe agreed with the Planning Secretary.</p>	<p>Community Communication Strategy Picton High School redevelopment, April 2019</p> <p>DPE Approval of Community Communications Strategy 05/04/19</p>	The Strategy has been prepared in accordance with the condition and approved by DPE.	Compliant
Ecologically Sustainable Development				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B11	Prior to the commencement of construction, the Applicant must submit details of all design measures to the satisfaction the Certifying Authority demonstrating the proposal incorporates ecologically sustainable development initiatives as outlined in <i>ESD report</i> (Rev 4) Ref 167053- ESD01 prepared by Northrop Consulting Engineers dated 04.04.2018 to achieve a minimum 5 Star Green Star rating.	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Outdoor Lighting				
B12	Prior to commencement of construction, all outdoor lighting within the site must comply with AS 1158.3.1:2005 Lighting for roads and public spaces- Pedestrian area (Category P) lighting - Performance and design requirements and AS 4282-1997 Control of the obtrusive effects of outdoor lighting. Details demonstrating compliance with these requirements must be submitted to the satisfaction of the Certifying Authority	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Access for People with Disabilities				
B13	The works that are the subject of this application must be designed and constructed to provide access and facilities for people with a disability in accordance with the BCA. Prior to the commencement of construction, the Certifying Authority must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Environmental Management Plan Requirements				

<p>B14</p>	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> a. detailed baseline data; b. details of: <ul style="list-style-type: none"> (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; c. a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; d. a program to monitor and report on the: <ul style="list-style-type: none"> (i) impacts and environmental performance of the development; (ii) effectiveness of the management measures set out pursuant to paragraph (c) above; e. a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; f. a program to investigate and implement ways to improve the environmental performance of the development over time; g. a protocol for managing and reporting any: h. incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (iii) complaint; (iv) failure to comply with statutory requirements; and i. a protocol for periodic review of the plan. <p><i>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</i></p>	<p>SSD 8640 Environmental Impact Statement Ethos Urban, 04/04/18</p> <p>Construction Environmental Management Plan Picton High School, SMEC, 05/04/19 (CEMP)</p> <p>Unexpected finds protocol</p> <p>Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19 (CTPMSP)</p> <p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19 (CNVMSP)</p> <p>Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP)</p> <p>Aboriginal Cultural Heritage Management Sub Plan Lot 2 DP 520158 Picton High School Redevelopment, AMAC and Streat</p>	<p>The CEMP is a suite of documents made up of the parent CEMP, sub-plans and protocols. Refer to responses in CoC B15 – B21 regarding the adequacy of each the documents referred to in those conditions.</p> <p>Baseline data has been obtained for noise and archaeological investigations. The EIS has been relied upon for all other baseline data. The auditor is of the view that this is adequate given the scope of works and the surrounding environment.</p> <p>Statutory requirements are addressed.</p> <p>Key performance indicators are included, as are details about measures to be implemented to meet the performance measures of the project.</p> <p>Contingency and corrective actions are addressed.</p> <p>Response and reporting of non-compliance and incidents is captured.</p> <p>Periodic review is included.</p>	<p>Compliant</p>
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
		Archaeological, V3, March 2019. (ACHMSP) Bushfire assessment Picton High School Redevelopment, Peterson Bushfire, 16/5/18. (BfMP) Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSP)		
Construction Environmental Management Plan				

<p>B15</p>	<p>Prior to commencement of construction, the Applicant must prepare a Construction Environmental Management Plan (CEMP) and it must include, but not be limited to, the following:</p> <p>a) Details of:</p> <ol style="list-style-type: none"> 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; <p>b) Construction Traffic and Pedestrian Management Sub-Plan (see condition B17);</p> <p>c) Construction Noise and Vibration Management Sub-Plan (see condition B18);</p> <p>d) Construction Waste Management Sub-Plan (see condition B19);</p> <p>e) Construction Soil and Water Management Sub-Plan (see condition B20);</p> <p>f) Aboriginal Cultural Heritage Management Sub-Plan (see condition B21);</p> <p>g) an unexpected finds protocol for contamination and associated communications procedure;</p> <p>h) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and</p> <p>i) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site</p>	<p>Construction Environmental Management Plan Picton High School, SMEC, 05/04/19 (CEMP)</p> <p>Unexpected finds protocol</p> <p>Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19 (CTPMSP)</p> <p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19 (CNVMSP)</p> <p>Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP)</p> <p>Aboriginal Cultural Heritage Management Sub Plan Lot 2 DP 520158 Picton High School Redevelopment, AMAC and Streat Archaeological, V3, March 2019. (ACHMSP)</p> <p>Bushfire assessment Picton High School</p>	<p>The CEMP includes the prescribed information other than that outlined below.</p> <p>Non-compliance: The 24-hour contact details of the site manager are not included. A groundwater management plan is not included. Details of outdoor lighting compliance with AS4282 is not included. The Waste Management Plan has been prepared but is not attached to the CEMP presented on the Picton High School website.</p> <p>Observations: The Auditor notes that the measures outlined in the CEMP and CSWMSP would prevent groundwater contamination. Requiring the development of a groundwater management plan is not appropriate for the scope of works as risk and interaction potential is low. Refer EIS Appendix J. The need to detail external lighting compliance need only be included if the Project proposes to install outdoor lighting.</p>	<p>Non-compliant</p>
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
		<p>Redevelopment, Peterson Bushfire, 16/5/18. (BfMP)</p> <p>Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMS)</p>		
B16	The Applicant must not commence construction of the development until the CEMP is approved by the Certifying Authority and a copy submitted to the Planning Secretary.	<p>CC1 P217_007-2, 16/4/19</p> <p>Submission of CEMP to DPE 16/4/19</p>	<p>The Certifying Authority approved the CEMP and it was submitted to DPE on 16/4/19.</p> <p>Construction commenced 10/5/19.</p>	Compliant
B17	<p>The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); b) be prepared in consultation with Council 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: <ul style="list-style-type: none"> i. minimise the impacts of earthworks and construction on the local and regional road network; ii. minimise conflicts with other road users; iii. minimise road traffic noise; and iv. ensure truck drivers use specified routes; f) a program to monitor the effectiveness of these measures; and g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes. 	Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19 (CTPMSP)	<p>The CTPMSP (within the CEMP) suitably satisfies requirements a), b) (via sharing of the relevant information as part of B29 correspondence), c), d), e), f), g).</p> <p>Observation: Requirement f) Monitoring of traffic and pedestrian management is presented in the CEMP rather than in the CTPMSP. The Auditor considers this to be appropriate.</p> <p>Observation: Requirement g) Details on community consultation are included in the CCS. The Auditor considers this to be appropriate.</p>	Compliant

<p>B18</p>	<p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced noise expert; b) describe procedures for achieving the noise management levels in EPA’s Interim Construction Noise Guideline (DECC, 2009); c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; d) include strategies that have been developed with the community for managing high noise generating works; e) describe the community consultation undertaken to develop the strategies in condition B23(d); and f) include a complaints management system that would be implemented for the duration of the construction. 	<p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19 (CNVMSP)</p>	<p>The CNVMSP adequately addresses requirements a), c), d) and f).</p> <p>Non-compliance Requirement e): The document states that consultation has occurred with affected receivers, but there is no detail provided as to how this consultation has assisted in the development of high noise management approach.</p> <p>Observation: Requirement b): Section 5.1.2 of the CNVMSP identifies noise criteria for non-residential properties as specified in the ICNG. It is unclear why the report does not include Classrooms at schools and other educational institutions, or places of worship given that these receivers exist adjacent or in proximity to the Project. Additionally, it is unclear as to why the temporary school has not been identified as a receiver in the report, or had the applicable NML applied to it.</p> <p>Observation: Section 9 of the CNVMSP provides an overview of the management approach when</p>	<p>Non-compliant</p>
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			<p>noise or vibration levels are predicted to exceed the applicable criteria. There is no detail provided as to how PHS would determine the predicted impact arising for a given activity would comply with the criteria or not (i.e.: there is no commitment to ongoing assessment through monitoring or modelling). Currently the Project team is consulting with the temporary school on potential impacts, based on their experience with construction rather than any quantitative. The risk of this approach is the over or under servicing of mitigations in lieu of reliable data. It is recommended that the Project consider engagement of an acoustic consultant to assess various packages of work and therefore inform the decision making tree in section 9 of the CNVMSP. A single round of noise monitoring was carried out, despite the CNVMSP not committing to undertaking any. Pursuant to the observation above, it would be beneficial to provide the construction team with greater guidance on when monitoring should be undertaken and how it</p>	
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
			<p>should be undertaken (AS1055).</p> <p>Observation: The CNVMP does not detail whether the noise penalties specified in the ICNG have been applied to the NMLs for potentially annoying noise characteristics.</p>	
B19	<p>The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; (b) removal of hazardous materials including asbestos, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works. 	Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSP)	<p>Non-compliance:</p> <p>The CWMSP identifies the waste streams to be generated and the reuse, recycling and disposal options. The document does not identify the quantities of each waste type as these are determined at a later date. The CWMSP does not include the details for the removal of hazardous materials. These are detailed within separate documents.</p> <p>The CWMSP is not attached to the CEMP.</p>	Non-compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B20	<p>The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction; (c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (d) detail all off-Site flows from the Site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI) 	Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP)	<p>The CSWMSP adequately addresses part of requirements a), and addresses requirements b), c).</p> <p>Non-compliance: There is no evidence that document was prepared in consultation with Council. There is no information in the plan that details measures to be implemented under the 1:100 year ARI storm events.</p> <p>Observation Section 5.6 of the CSWMSP that deals with discharging of waters does not align with the requirement of CoC C28.</p>	Non-compliant
B21	<p>The Aboriginal Cultural Heritage Management Sub-Plan (ACHMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced expert in consultation with the Registered Aboriginal Parties; and (b) be submitted to the satisfaction of the Planning Secretary prior to construction of any part of the development. 	Aboriginal Cultural Heritage Management Sub Plan Lot 2 DP 520158 Picton High School Redevelopment, AMAC and Streat Archaeological, V3, March 2019. (ACHMSP)	<p>Non-compliance: The document is still in draft. There was no evidence at the time of the audit to demonstrate that the document had been submitted to, and approved by, the Planning Secretary prior to commencement of construction.</p>	Non-compliant
Construction Parking				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B22	Prior to the commencement of construction, the Applicant must provide sufficient parking facilities for heavy vehicles on-site (unless alternative parking is agreed to in writing from the relevant road authority) and ensure that construction traffic associated with the development minimises on-street parking or the use of public parking facilities.	Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19 (CTPMSP) Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSP) Site inspection 19/06/19	The project contains sufficient space for HV parking and movements internal to the site.	Compliant
Road Design and Traffic Facilities				
B23	All roads and traffic facilities must be designed to meet the requirements of Council or RMS (whichever is applicable). The necessary permits and approvals from the relevant road authority must be obtained prior to the commencement of road or pavement construction works.	Interview with auditees 19/06/19 Site inspection 19/06/19	No road and traffic facilities were established or required at the time of the audit.	Not triggered
Stormwater Management System				
B24	Prior to the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifying Authority. The system must: <ul style="list-style-type: none"> (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the EIS; (c) be in accordance with applicable Australian Standards; (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines; 	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Operational Noise- Design of Mechanical Plant and Equipment				
B25	Prior to commencement of construction, the Applicant must incorporate the noise mitigation recommendations in the <i>Acoustic Assessment Report</i> Rev 1 prepared by GHD dated April 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 recommended operational noise levels identified in the <i>Acoustic Assessment Report</i> Rev 1 prepared by GHD dated April 2018.	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Biodiversity				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B26	<p>Prior to any clearing or construction works, the Applicant must purchase and retire 10 ecosystem credits to offset the removal of native vegetation on site. The ecosystem credits must be determined in accordance with the OEH's <i>Framework for Biodiversity Assessment (FBA)</i> and the <i>Biobanking Assessment Methodology 2014 (BBAM)</i>.</p> <p>Note: <i>If the Applicant seeks a variation to the offset rules, the Applicant must demonstrate that reasonable steps have been taken to find like-for-like offsets in accordance with Section 10.5.4.2 of the FBA and Appendix A of the OEH's NSW Biodiversity Offsets Policy for Major Projects 2014</i></p>	<p>Interview with auditees 19/06/19</p> <p>Ecosystem credit application 06/05/19</p>	<p>Non-compliance: The ecosystems credits were not retired prior to clearing or construction works. The Project submitted the application to submit into the Biodiversity Conservation Fund on 06/05/19. On 13/05/19 the OEH responded to advise that they required a statement of reasonable equivalence and resubmission (due to the implementation of the new OEH offsetting process). The updated application is currently being prepared.</p>	Non-compliant
Construction and Demolition Waste Management				
B27	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.	Correspondence to RMS 20/03/19 and from RMS to TMC 25/03/19	Notification occurred prior to commencement of works.	Compliant
Operational Waste Storage and Processing				
B28	Prior to the commencement of construction, the Applicant must obtain agreement from Council for the design of the operational waste storage area where waste removal is undertaken by Council.	<p>DPE approval of staging report 7/5/19.</p> <p>Staging report 18/4/19</p>	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Mechanical Ventilation				
B29	All mechanical ventilation systems must be designed in accordance with Part F4.5 of the BCA and must comply with the AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and AS/NZS 3666.1:2011 Air handling and water systems of buildings-Microbial control to ensure adequate levels of health and amenity to the occupants of the building and to ensure environment protection. Details must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction.	<p>DPE approval of staging report 7/5/19.</p> <p>Staging report 18/4/19</p>	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Rainwater Harvesting				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B30	Prior to the commencement of construction, the Applicant must ensure that a rainwater reuse/harvesting system for the development is developed for the site. A rainwater re-use plan must be prepared and certified by an experienced hydraulic engineer.	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Roadworks and Access				
B31	Prior to the commencement of construction, the Applicant must submit design plans to the satisfaction of the Certifying Authority which demonstrates that the proposed internal roads comply with section 4.2.7 of <i>Planning for Bush Fire Protection 2006</i> .	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
B32	Prior to the commencement of construction, the Applicant must prepare plans in consultation with Council to include: (a) a plan (including swept path analysis) for the Argyle Street bus bay that allows for buses to 'leap frog', avoid conflict with other buses and prevent queuing on Argyle Street; (b) signage and line-markings for the proposed changes to the Argyle Street kerb-side parking restrictions; and (c) design details for the Wonga Road extension including bus bays. The Applicant must obtain approval for the works under section 138 of the Roads Act 1993. Plans must be submitted to the satisfaction of Planning Secretary.	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
B33	Prior to the commencement of construction, the Applicant must prepare an updated Road Safety Evaluation (RSE) as per the NSW Centre for Road Safety Guidelines for Road Safety Audit Practices and Austroads Guide to Road Safety Part 6: Road Safety Audit) for all relevant sections of road utilised for bus and private vehicle pick-up and drop-off in consultation with Council. The Applicant must submit the plans to Planning Secretary for information.	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
Car Parking and Service Vehicle Layout				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B34	<p>Compliance with the following requirements must be submitted to the satisfaction of the Planning Secretary prior to the commencement of construction:</p> <ul style="list-style-type: none"> (a) all vehicles must enter and leave the Site in a forward direction; (b) minimum of 141 on-site car parking spaces (including 4 accessible parking spaces) for use during operation of the development and designed in accordance with the latest version of AS2890.1 (c) the swept path of the longest vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the Site, must be in accordance with AUSTRROADS; (d) amended plans demonstrating the swept path of the waste collection vehicle and the manoeuvrability through the Site, must be designed in accordance with AS2890.1 – 2004 and AS20890.2 – 2002; and (e) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed 	<p>DPE approval of staging report 7/5/19.</p> <p>Staging report 18/4/19</p>	<p>The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.</p>	<p>Not triggered</p>
Bicycle Parking and End-of-Trip Facilities				
B35	<p>Compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction:</p> <ul style="list-style-type: none"> a. the provision of a minimum 27 bicycle parking spaces; b. the provision of 4 motorcycle parking spaces; c. the layout, design and security of bicycle facilities must comply with the minimum requirements of AS 2890.3:2015 <i>Parking facilities - Bicycle parking</i>, and be located in easy to access, well-lit areas that incorporate passive surveillance; d. the provision of end-of-trip facilities for staff in accordance with the ESD Design & As Built rating tool; e. appropriate pedestrian and cyclist advisory signs are to be provided; and f. all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority. 	<p>DPE approval of staging report 7/5/19.</p> <p>Staging report 18/4/19</p>	<p>The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.</p>	<p>Not triggered</p>
Public Domain Works				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B36	Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifying Authority that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from Council to the Certifying Authority.	<p>Interview with auditees 19/06/19</p> <p>Site inspection 19/06/19</p> <p>Stamped plans for Wonga Road 190529</p> <p>Consultation records with Council 28/11/18 – 29/05/19</p> <p>CC1 P217_007-2, 16/4/19</p>	<p>Sighted design and consultation records for Wonga Road works.</p> <p>Non-compliance: There was no evidence at the time of the audit that the streetscape design and treatment had been to the Certifying Authority's satisfaction.</p>	Non-compliant
Compliance Reporting				
B37	No later than two weeks before the date notified for the commencement of construction, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority. Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018). The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the Certifying Authority in writing at least seven days before this is done.	<p>Compliance program 09/04/19 and submission correspondence 16/04/19</p> <p>Preconstruction Compliance report 24/04/19</p> <p>Interview with auditees 19/06/19</p>	<p>The program was submitted >2 weeks prior to construction.</p> <p>The PCCR was submitted prior to construction.</p>	Compliant
B38	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance	-	The project is in construction	Not triggered
Sydney Water Approval				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
B39	The approved plans must be checked online with Sydney Water Tap in™ to determine whether the development would affect any Sydney Water infrastructure, and if further requirements are to be met. A copy of this approval must be submitted to the Principal Certifying Authority prior to works commencing. Please refer to the Sydney Water Tap in™ website for details.	DPE approval of staging report 7/5/19. Staging report 18/4/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.	Not triggered
PART C DURING CONSTRUCTION				
Approved Plans to be On-site				
C1	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.	Site inspection 19/06/19	All certified plans and documents were readily available on site.	Compliant
Site Notice				
C2	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.	Site inspection 19/06/19	Sighted site notices. They satisfied the requirements of this condition	Compliant
Operation of Plant and Equipment				
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	Mobile plant inspection checklists JCB 541-70 including risk assessments and service records Driver induction records including licence and ticket check.	A plant onboarding process is being implemented. The process includes check of maintenance records which must be <3 months old. All plant operators licenses are checked to ensure they are competent.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
Demolition				
C4	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.	Demolition swms 6767 Demolition sequence 181019 Walan demolition works plan 08/04/19 Tree removal plans 190404 AA020001 CC1 P217_007-2, 16/4/19	The walan demolition works plan are prepared by the demolition contractor WHS Manager details compliance with AS2601. It is complemented by work method statements. CC1 issued by CA 16/04/19.	Compliant
Construction Hours				
C5	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7:00 am and 6:00 pm, Mondays to Fridays inclusive; and (b) between 8:00 am and 1:00 pm, Saturdays. No work may be carried out on Sundays or public holidays.	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19 (CNVMSP) TBT 16/06/19	The hours are regularly communicated to personnel and are present in project documentation.	Compliant
C6	Activities may be undertaken outside of the hours in condition C5 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.	Interview with auditees 19/06/19	No out of hours works have occurred.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C7	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: <ul style="list-style-type: none"> (a) 9 am to 12 pm, Monday to Friday; (b) 2 pm to 5 pm Monday to Friday; and (c) 9 am to 12 pm, Saturday. 	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19 (CNVMSP) TBT 16/06/19 and 06/06/19	The intra-day respite periods have been communicated to personnel and are present in project documentation	Compliant
Implementation of Management Plans				
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).	Refer to Appendix B for assessment of implementation of CEMP and Sub-plans	Refer to Appendix B for assessment of implementation of CEMP and Sub-plans. The Project appeared to be implementing the CEMP and Sub-plans for the works being carried out during the reporting period.	Compliant
Construction Traffic				
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.	Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19 (CTPMSP) Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSP) Site inspection 19/06/19	The project contains sufficient space for HV parking and movements internal to the site. The access gate is manned to allow vehicles to enter the site without extended stopping.	Compliant
Road Occupancy Licence				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C10	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	ROL 201.2019.00000024.001 for Wonga Rd TCP Wonga Road 30/05/19	A road occupancy licence was obtained by the Project for Wonga Road works.	Compliant
SafeWork Requirements				
C11	To protect the safety of work personnel and the public, the work site must be adequately secured to prevent access by unauthorised personnel, and work must be conducted at all times in accordance with relevant SafeWork requirements.	Interview with auditees 19/06/19 Site inspection 19/06/19 TBT records 07/03/19 – 18/06/19	The site is suitably secured to prevent third party access. Project HSE risks are toolboxed, with controls and rules identified for implementation. 3 x personnel have undergone asbestos awareness training. Refer response to CoC C35 for management of asbestos.	Compliant
Hoarding Requirements				
C12	The following hoarding requirements must be complied with: (a) no third-party advertising is permitted to be displayed on the subject hoarding/fencing; (b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application; and (c) the Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.	Site inspection 19/06/19	No hoarding on third party property. No b class hoarding required. Hoarding was free of advertising and graffiti.	Compliant
No Obstruction of Public Way				
C13	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under and circumstances. Non-compliance with this requirement will result in the issue of a notice by the relevant Authority to stop all works on site.	Site inspection 19/06/19 TBT 14/03/19, 05/03/19	There were no obstructions to public access observed. The need to maintain access is communicated to workforce.	Compliant
Construction Noise Limits				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C14	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.	<p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19 (CNVMSP)</p> <p>TBT 21/03/19, 18/06/19, 22/05/19, 16/06/19 and 06/06/19</p> <p>'Traffic light' report 17/06/19 and 06/06/19</p> <p>Acoustic Logic noise monitoring report 05/06/19</p> <p>Site inspection 19/06/19</p>	<p>The need to minimise noise impacts is identified in Project documentation and is communicated to the workforce. The Project also produces a 'traffic light' report which identifies upcoming construction works and the potential noise impacts. Note that this is prepared on the basis of the team experience with construction, rather than using any predictive modelling. The report is provided to the temporary school to enable consultation on any clashes with important classes etc.</p> <p>Hoarding is in place.</p> <p>Non-tonal beepers are fitted to long term plant.</p> <p>Monitoring from within the temporary school does not show excessive noise levels</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C15	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C5.	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19 (CNVMSP) TBT 16/06/19	The hours are regularly communicated to personnel and are present in project documentation.	Compliant
C16	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use audible movement alarms of a type that would minimise noise impacts on surrounding noise sensitive receivers	Interview with auditees 19/06/19 Site inspection 19/06/19	Non-tonal beepers are fitted to long term plant.	Compliant
C17	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.	Refer response to CoC C14	Refer response to CoC C14	Compliant
Vibration Criteria				
C18	Vibration caused by construction at any residence or structure outside the site must be limited to: <ul style="list-style-type: none"> (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time). 	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19 (CNVMSP)	The CNVMSP identifies the relevant criteria in Section 5.2. Section 9 identifies a process by which deviations from the applicable criteria are to be managed. Refer response to CoC B18 regarding the adequacy of the guidance presented in Section 9 of the CNVMSP. Observation: The Project indicated that vibration monitoring had occurred, yet there was no evidence to demonstrate that this was the case.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C19	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	Site inspection 19/06/19 Interview with auditees 19/06/19	No vibratory rollers are currently being used on site. The CNVMSP identifies the relevant criteria in Section 5.2. Section 9 identifies a process by which deviations from the applicable criteria are to be managed. Refer response to CoC B18 regarding the adequacy of the guidance presented in Section 9 of the CNVMSP.	Not triggered
C20	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 B23 of this consent.	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19 (CNVMSP)	The CNVMSP identifies the relevant criteria in Section 5.2. Section 9 identifies a process by which deviations from the applicable criteria are to be managed. Refer response to CoC B18 regarding the adequacy of the guidance presented in Section 9 of the CNVMSP.	Compliant
Detailed Site Investigation				
C21	Following the relocation or demolition of any existing structures, infrastructure and in ground utilities, the Applicant is to carry out further investigation of soil contamination (including within the footprint and immediate surrounds of those structures, infrastructures and utilities prior to undertaking any construction) to address any contamination with regard to the following: <ul style="list-style-type: none"> a. NSW EPA Sampling Design Guidelines; b. Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017; c. Guidelines for Consultants Reporting on Contamination Sites, 2011; and d. The National Environment Protection (Assessment of Contamination) Measure. 	Site inspection 19/06/19	Demolition and utility relocation was nearing completion at the time of the audit.	Not triggered
Tree Protection				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C22	For the duration of the construction works: <ul style="list-style-type: none"> (a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; (b) all street trees must be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council; (c) all trees on the site must be suitably protected during construction as per recommendations of the report titled Report: A) Arboricultural Impact Assessment and B) Tree Management Plan, prepared by Redgum Horticultural and dated 2 December 2018; and (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater. 	Site inspection 19/06/19	No street trees had been pruned or removed. Non-compliance: The trees remaining on site were not protected in a manner consistent with the Arboricultural Impact Assessment and B) Tree Management Plan, prepared by Redgum Horticultural and dated 2 December 2018. The Project advised that works around the trees were current and that proper Tree Protection Zones would be re-established. There was no evidence at the time of the audit to demonstrate that guidance had been sought for works encroaching on Tree Protection Zones.	Non-compliant
Dust Minimisation				
C23	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Site inspection 19/06/19 TBT 03/06/19, 25/05/19, 22/05/19, 28/05/19	Dust risk and control is communicated to project personnel. The Project has set up a boundary misting system and portable gerni to suppress fugitive dust as required. No issues observed.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C24	<p>During construction, the Applicant must ensure that:</p> <ul style="list-style-type: none"> (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. 	<p>Site inspection 19/06/19</p> <p>TBT 03/06/19, 25/05/19, 22/05/19, 28/05/19</p>	<p>Dust risk and control is communicated to project personnel.</p> <p>The Project has set up a boundary misting system and portable gerni to suppress fugitive dust as required.</p> <p>Observed a waste truck apply covers.</p> <p>Site access and egress is sealed and includes a rumble grid. No material tracking observed.</p>	Compliant
Air Quality Discharges				
C25	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	-	The Project does not hold an EPL	Not triggered
Erosion and Sediment Control				
C26	All erosion and sediment control measures, must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment.	<p>Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP)</p> <p>Site inspection 19/06/19</p> <p>TBT 07/03/19</p>	<p>An erosion and sediment control plan has been developed for the Project. The Project utilises existing assets with passive controls as protection. Controls appeared to be installed as per the plan.</p> <p>The need to check / manage ERSER controls has been communicated to Project personnel.</p>	Compliant
Imported Soil				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C27	The Applicant must: <ul style="list-style-type: none"> (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 Certifying Authority upon request. 	Interview with auditees 19/06/19 Site inspection 19/06/19	The Project is in demolition phase. No material has been needed on site. No material import has occurred. Observation: The CEMP does not identify any requirements relating to import of material. This requirement should be communicated (and documented) to ensure unsuitable material is not imported.	Not triggered
Disposal of Seepage and Stormwater				

C28	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.	<p>Interview with auditees 19/06/19</p> <p>Site inspection 19/06/19</p> <p>Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP)</p>	<p>The Project has not needed to pump water offsite. The ERSED controls in the ERSED plan are passive.</p> <p>Observation: This standard condition is problematic as the EPA is generally reluctant to licence non-scheduled activities unless otherwise justified by the applicant. This means that the Project must reuse all water captured on site or pay for it to be removed as liquid waste or tradewaste. The auditor notes that generally Sydney Water are also reluctant to permit disposal of rainwater captured on construction sites to sewer due to sediment loading. Considering the supposed intention of this condition (to prevent the pollution of waters), the auditor suggests the Project contact the Department to seek clarification as to whether discharges to stormwater without EPA approval are considered a contravention of the consent even if the discharges comply with S120 of the POEO Act (and do not result in the pollution of waters). Additionally the CSWMSP does not reflect this</p>	Not triggered
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
			condition. Refer response to CoC B20.	
Unexpected Finds Protocol- Aboriginal Heritage				
C29	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.	Interview with auditees 19/06/19 Site inspection 19/06/19	There were no unexpected finds reported during the audit period.	Not triggered.
Unexpected Finds Protocol- Historic Heritage				
C30	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.	Interview with auditees 19/06/19 Site inspection 19/06/19	There were no unexpected finds reported during the audit period.	Not triggered.
Waste Storage and Processing				
C31	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.	Site inspection 19/06/19	Waste is segregated and stored in skip bins. There were no issues observed.	Compliant
C32	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSP) Interview with auditees 19/06/19 Site inspection 19/06/19	Non-compliance: There was no evidence available at the time of the audit that material had been classified and managed in accordance with the waste classification guidelines.	Non-compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C33	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.	Site inspection 19/06/19	Sighted a waste transporter load up material and install covers before leaving site. Adequate space is available for waste and other HV movements and parking on site. Refer response to CoC C24.	Compliant
C34	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	Site inspection 19/06/19	There has been a limited amount of concrete used for the current stage of works. Two concrete washout bins were observed. Some excess concrete was used for parking bay.	Compliant
Handling of Asbestos				
C35	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.	ATS notice to SafeWork of removal of friable and non-friable asbestos 06/04/19 – 04/06/20 ATS WHS Plan 05/04/19	Non-compliance: There was no evidence available at the time of the audit that ACM had appropriately disposed of in accordance with the POEO Waste Regulation.	Non-compliant
Incident Notification, Reporting and Response				
C36	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 1. <i>Note: Appendix 1 as provided in SSD 8640 Development Consent</i>	Interview with auditees 19/06/19	No incidents or non-compliances have been identified by the Project.	Not triggered
Non-Compliance Notification				
C37	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	Interview with auditees 19/06/19	No incidents or non-compliances have been identified by the Project.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	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.			
Independent Environmental Audit				
C38	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	DPE approval of auditors, 03/05/19	The auditors were approved prior to the development of the Audit Program and the Independent Audit	Compliant
C39	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.	Independent Audit Program, WolfPeak 27/05/19 Submission of Program to DPE, 25/06/19	Non-compliance: the Audit Program was not submitted until 25/06/19, approximately 6 weeks after commencement of construction	Non-compliant
C40	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 8 weeks of the notified commencement date of construction; and (b) a subsequent Independent Audit of construction must be undertaken no later than 6 months from the date of the initial construction Independent Audit.	Independent Audit Program, WolfPeak 27/05/19 This audit	The audit frequencies presented in the Audit Schedule (within the Program) reflect this requirement	Compliant
C41	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 C38 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).	This audit	The audit was conducted in accordance with CoC C38 and the Departments IAPAR	Compliant
C42	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 C41 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.	These activities occur following finalisation of this audit report.	These activities occur following finalisation of this audit report.	Not triggered.
C43	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual	Works are in early stages of construction.	Works are in early stages of construction.	Not triggered.

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.			
Revision of Strategies, Plans and Programs				
C44	Within three months of: <ul style="list-style-type: none"> (a) the submission of a compliance report under condition B37; (b) the submission of an incident report under condition C36; (c) the submission of an Independent Audit under condition C40; (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.	Interview with auditees 19/06/19 This audit Pre-construction Compliance report 24/04/19	The first review will be required 3 months from the submission of the Pre-construction Compliance Report, being 24/07/19	Not triggered
C45	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. <i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development</i>	Interview with auditees 19/06/19 This audit Pre-construction Compliance report 24/04/19	The first review will be required 3 months from the submission of the Pre-construction Compliance Report, being 24/07/19	Not triggered
Archaeological Work Method Statement				
C46	An Archaeological Work Method Statement for the works on the alignment of the Hume Highway (Argyle Street) is to be prepared by a qualified archaeologist and be in place at the site for the duration of excavation works.	Interview with auditees 19/06/19 Site inspection 19/06/19	Works along the Hume Highway (Argyle Street) had not commenced at the time of the audit.	Not triggered
PART D PRIOR TO OCCUPATION OR COMMENCEMENT OF USE				
Notification of Occupation				
D1	The date of commencement of the occupation of the development must be notified to the Department in writing, at least one month before occupation. If the operation of the development is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.		The Project only recently commenced construction	Not triggered
External Walls and Cladding				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
D2	Prior to the occupation of the building, the Applicant must provide the Certifying Authority with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.		The Project only recently commenced construction	Not triggered
D3	The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it		The Project only recently commenced construction	Not triggered
Protection of Public Infrastructure				
D4	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> e. repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and f. relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development. <p>Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions required by D9 of this consent.</p>		The Project only recently commenced construction	Not triggered
Post-construction Dilapidation Report				
D5	<p>Prior to occupation of the building, the Applicant must engage a suitably qualified person to prepare a post-construction dilapidation report at the completion of construction. This report is:</p> <ul style="list-style-type: none"> (a) to ascertain whether the construction created any structural damage to adjoining buildings or infrastructure. (b) to be submitted to the Certifying Authority. In ascertaining whether adverse structural damage has occurred to adjoining buildings or infrastructure, the Certifying Authority must: <ul style="list-style-type: none"> i. compare the post-construction dilapidation report with the pre-construction dilapidation report required by these conditions; and ii. have written confirmation from the relevant authority that there is no adverse structural damage to their infrastructure and roads. (c) to be forwarded to Council. 		The Project only recently commenced construction	Not triggered
Dedication of Public Road				
D6	The Wonga Road extension including roundabout and associated land on approved plans (Site Context Plan prepared by Billard Leece Partnership dated 30.08.2018) must be dedicated to Wollondilly Shire Council as a 'public road' at no cost to Council.		The Project only recently commenced construction	Not triggered
Roadworks and Access				
D7	Prior to the commencement of operation of the development, the Applicant must complete the construction of the Wonga Road extension including roundabout to the satisfaction of Council.		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
D8	Prior to the commencement of operation of the development, the Applicant must implement detailed signage and line-marking plan in accordance with condition B32.		The Project only recently commenced construction	Not triggered
Works as Executed Plans				
D9	Prior to occupation of the building, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifying Authority.		The Project only recently commenced construction	Not triggered
Utilities and Services				
D10	Prior to occupation of the building, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the <i>Sydney Water Act 1994</i> .		The Project only recently commenced construction	Not triggered
Road Safety Evaluation				
D11	Any recommendations of the RSE as required by condition B33, must be implemented on all relevant sections of Argyle Street and Wonga Road utilised for bus and private vehicle drop-off and pick-up.		The Project only recently commenced construction	Not triggered
Green Travel Plan				
D12	<p>Prior to the commencement of operation, a Green Travel Plan (GTP), must be prepared and be submitted to the Secretary to promote the use of active and sustainable transport modes. The plan must:</p> <ol style="list-style-type: none"> be prepared by a suitably qualified traffic consultant in consultation with Council and Transport for NSW; include objectives and modes share targets (i.e. Site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP; include specific tools and actions to help achieve the objectives and mode share targets; include measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the GTP; and include details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of students and staff to and from both schools at appropriate times throughout the academic year. 		The Project only recently commenced construction	Not triggered
Operational Transport and Access Management Plan				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
D13	<p>An OTAMP is to be prepared for the school (or separately for each school) by a suitably qualified person, in consultation with Council, Transport for NSW and RMS, to the satisfaction of the Secretary, and must address the following:</p> <ul style="list-style-type: none"> a) Detailed pedestrian analysis including the identification of safe route options- to identify the need for management measures such as staggered school start and finish times to ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish; b) the location of all car parking spaces on the school campuses and their allocation (i.e. staff, visitor, accessible, emergency, etc.); c) the location and operational management procedures of the pick-up and drop-off parking, including staff management/traffic controller arrangements; d) the location and operational management procedures for the pick-up and drop-off of students by buses and coaches for excursions and sporting activities during the hours of bus lane operations, including staff management/traffic controller arrangements; e) delivery and services vehicle and bus access and management arrangements; f) management of approved access arrangements; g) potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing pick-up and drop-off parking; h) car parking arrangements and management associated with the proposed use of school facilities by community members; and i) a monitoring and review program. <p>The OTAMP(s) must be submitted to the Secretary for approval prior to operation of the development. The OTAMP(s) (as revised from time to time) must be implemented by the Applicant for the life of the development</p>		The Project only recently commenced construction	Not triggered
Evacuation and Emergency Management Plan				
D14	<p>Prior to the operation of the development, a Bush Fire Emergency Management and Evacuation Plan must be prepared consistent with <i>Development Planning – A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan</i> December 2014.</p>		The Project only recently commenced construction	Not triggered
School Zones				
D15	<p>Installation of all required School Zone signage, speed management signage and associated pavement markings is to be completed prior to commencement of occupation of the development. <i>Note: Any required approvals for altering public road speed limits, design and signage are required to be obtained from the relevant consent authority.</i></p>		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
D16	Following installation of School Zone signage, speed management signage and associated pavement markings, as required by condition D15, the Applicant must arrange an inspection with RMS for formal handover of assets. The handover of assets must occur prior to commencement of use of the development.		The Project only recently commenced construction	Not triggered
D17	The Applicant must maintain records of all dates in relation to installing, altering and removing traffic control devices related to speed.		The Project only recently commenced construction	Not triggered
Mechanical Ventilation				
D18	Following completion, installation and testing of all mechanical ventilation systems, the Applicant must provide evidence to the satisfaction of the Certifying Authority, prior to the final occupation, that the installation and performance of the mechanical systems complies with: <ul style="list-style-type: none"> a) the BCA; b) AS 1668.2-2012 The use of air-conditioning in buildings- Mechanical ventilation in buildings and other relevant codes; c) the development consent and any relevant modifications; and d) any dispensation granted by the NSW Fire Brigade. 		The Project only recently commenced construction	Not triggered
Road Damage				
D19	The cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Subject Site as a result of construction works associated with the approved development is to be met in full by the Applicant prior to commencement of use of any stage of the development.		The Project only recently commenced construction	Not triggered
Fire Safety Certification				
D20	Prior to the final occupation, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety Certificate must be submitted to the relevant authority and Council. The Fire Safety Certificate must be prominently displayed in the building.		The Project only recently commenced construction	Not triggered
Structural Inspection Certificate				
D21	A Structural Inspection Certificate or a Compliance Certificate must be submitted to the satisfaction of the Certifying Authority prior to the occupation of the relevant parts of any new or refurbished buildings. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the approval authority and the Council after: <ul style="list-style-type: none"> a) the site has been periodically inspected and the Certifying Authority is satisfied that the structural works is deemed to comply with the final design drawings; and b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s. 		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	c) person/s authorised to, for the life of the development			
Compliance with Food Code				
D22	The Applicant is to obtain a certificate from a suitably qualified tradesperson, certifying that the kitchen, food storage and food preparation areas have been fitted in accordance with the AS 4674 Design, construction and fit-out of food premises. The Applicant must provide evidence of receipt of the certificate to the satisfaction of the Certifying Authority prior to occupation.		The Project only recently commenced construction	Not triggered
Stormwater Quality Management Plan				
D23	Prior to occupation of the building, an Operation and Maintenance Plan (OMP) is to be prepared to ensure proposed stormwater quality measures remain effective. The OMP must contain the following: <ul style="list-style-type: none"> a) maintenance schedule of all stormwater quality treatment devices; b) record and reporting details; c) relevant contact information; and d) Work Health and Safety requirements 		The Project only recently commenced construction	Not triggered
Rainwater Harvesting				
D25	A signed works-as-executed Rainwater Re-use Plan must be provided to the Certifying Authority prior to occupation of the building.		The Project only recently commenced construction	Not triggered
Warm Water Systems and Cooling Systems				
D26	The installation, operation and maintenance of warm water systems and water cooling systems (as defined under the <i>Public Health Act 2010</i>) must comply with the <i>Public Health Act 2010</i> , Public Health Regulation 2012 and Parts 1 and 2 (or Part 3 if a Performance-based water cooling system) of <i>AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance</i> and the NSW Health Code of Practice for the Control of Legionnaires' Disease.		The Project only recently commenced construction	Not triggered
Outdoor Lighting				
D27	The Applicant must ensure the installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers. Outdoor lighting must: <ul style="list-style-type: none"> a) comply with the latest version of AS 4282-1997 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and b) be mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. Upon installation of outdoor lighting, but before it is finally commissioned, the Applicant must submit to the Certifier evidence from a qualified practitioner demonstrating compliance in accordance with this condition.		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
Signage				
D28	Way-finding signage and signage identifying the location of staff car parking must be installed prior to occupation.		The Project only recently commenced construction	Not triggered
D29	'No vehicular entry' signage must be installed to direct vehicles not to enter the southern staff car park on Argyle Street from the Wonga Road entry.		The Project only recently commenced construction	Not triggered
D30	Bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas prior to occupation.		The Project only recently commenced construction	Not triggered
D31	'Do not drink' signage on non-potable water used for toilet flushing and to new hose taps and irrigation systems for landscaped areas must be installed within the site prior to occupation.		The Project only recently commenced construction	Not triggered
Operational Waste Management Plan				
D32	<p>Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Certifying Authority. The Waste Management Plan must:</p> <ul style="list-style-type: none"> a) detail the type and quantity of waste to be generated during operation of the development; b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); c) detail the materials to be reused or recycled, either on or off site; and d) include the Management and Mitigation Measures included in RtS 		The Project only recently commenced construction	Not triggered
Validation Report				
D33	<p>The Applicant must prepare a Validation Report for the development. The Validation Report must:</p> <ul style="list-style-type: none"> a) be prepared by an EPA accredited Site Auditor; b) be submitted to EPA, the Planning Secretary and the Certifying Authority for information one month after the completion of remediation works; c) be prepared in accordance with the RAP and the <i>Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites</i> (OEH, 2011); d)) include, but not be limited to: <ul style="list-style-type: none"> (i) comment on the extent and nature of the remediation undertaken; (ii) describe the location, nature and extent of any remaining contamination on site; (iii) sampling and analysis plan and sampling methodology; 		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	(iv) results of sampling of treated material, compared with the treatment criteria; (v) details of the volume of treated material emplaced within the containment cell and its location; (vi) results of any validation sampling, compared to relevant guidelines/criteria; (vii) discussion of the suitability the remediated areas for the intended land use; and (viii) any other requirement relevant to the project.			
Site Audit Report and Site Audit Statement				
D34	Prior to occupation of the building, the Applicant must obtain from an EPA accredited Site Auditor, a Site Audit Statement and a Site Audit Report which demonstrates that the site is suitable for its intended use(s).		The Project only recently commenced construction	Not triggered
D35	Within three months of submission of the Validation Report required by condition D26, the Applicant must demonstrate to the satisfaction of the Certifying Authority that the Site Auditor has submitted a Site Audit Report and Site Audit Statement to EPA in accordance with the requirements of EPA's Guidelines for the NSW Site Auditor Scheme (DEC, 2006).		The Project only recently commenced construction	Not triggered
Landscaping				
D36	Prior to occupation of the building, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping works on-site, to the satisfaction of the Planning Secretary. The plan must: <ol style="list-style-type: none"> a) Include revised landscape plan as per condition B4 to include planting in accordance with the approved Softscape Tree Size Specification & Formal Softscape Areas (issue B) prepared by Arcadia Landscape Architecture dated February 2018 and at least 14 additional canopy trees; b) detail the species to be planted on-site; c) include details of the area surrounding the education trail is to be s to be rehabilitated with local native plants; d) include details that the native trees to be removed from the site are to be salvaged, including tree hollows and tree trunks (greater than 25cm in diameter and 3m in length) and used to enhance habitat at the site; e) include details of the installation of artificial nest boxes which are suitable to native fauna; f) detail that the seeds from native plants to be removed is collected and used in the landscape area; g) provide an ongoing weed control and maintenance program to maintain the existing and new remnant native vegetations; 		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> h) describe the monitoring and maintenance measures to manage revegetation and landscaping works; and i) comply with the principles of Appendix 5 of <i>Planning for Bush Fire Protection 2006</i>. 			
D37	The Applicant must not commence operation until the Landscape Management Plan is submitted to the Certifying Authority.		The Project only recently commenced construction	Not triggered
Asset Protection Zones				
D38	Prior to the commencement of operation, the entire property must be managed as an inner protection zone (IPA) as outlined within section 4.1.3 and Appendix 5 of the <i>Planning for Bush Fire Protection 2006</i> and the NSW RFS document Standards for asset protection zones.		The Project only recently commenced construction	Not triggered
Speed Limit Authorisation				
D39	<p>The Applicant must submit the following details to RMS, at least eight weeks prior to occupation of the site, and obtain authorisation to install School Zone signs and associated pavement markings, and / or removal / relocation of any existing Speed Limit signs:</p> <ul style="list-style-type: none"> a) a copy of the Conditions of Consent; b) the proposed school commencement/opening date; c) two sets of detailed design plans showing the following: <ul style="list-style-type: none"> (i) accurate Site boundaries; (ii) details of all road reserves, adjacent to the Site boundaries; (iii) all proposed access points from the Site to the public road network and any additional conditions imposed/proposed on their use; (iv) all existing and proposed pedestrian crossing facilities on the adjacent road network; (v) all existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings); and (vi) all existing and proposed street furniture and street trees. 		The Project only recently commenced construction	Not triggered
PART E POST OCCUPATION				
Out of Hours Event Management Plan				
E1	<p>The Applicant is to prepare an Out of Hours Event Management Plan for out of hours events run by the school that involve 100 or more people. The plan must be prepared in consultation with Council, and include the following:</p> <ul style="list-style-type: none"> a) the number of attendees, time and duration; b) arrival and departure times and modes of transport; c) where relevant, a schedule of all annual events; 		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	<p>d) demonstrate measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport);</p> <p>e) measures to minimise localised traffic and parking impacts; and</p> <p>f) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.</p> <p>The Applicant must submit a copy of the Out of Hours Event Management Plan to the Department and to the Council, prior to commencement of the first event. The Out of Hours Event Management Plan must be implemented by the Applicant for the duration of the identified events or use.</p>			
E2	<p>The Applicant is to prepare an Out of Hours Event Management Plan for out of hours events run by external parties that involve 100 or more people. The plan must be prepared prior to each relevant event, in consultation with Council, and include the following:</p> <p>a) the number of attendees, time and duration;</p> <p>b) arrival and departure times and modes of transport;</p> <p>c) where relevant, a schedule of all annual events;</p> <p>d) demonstrate measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport);</p> <p>e) measures to minimise localised traffic and parking impacts; and</p> <p>f) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.</p> <p>The Applicant must submit a copy of the Out of Hours Event Management Plan to the Department and to the Council, prior to commencement of each relevant event. The Out of Hours Event Management Plan must be implemented by the Applicant for the duration of the identified community event or use.</p>		The Project only recently commenced construction	Not triggered
Operation of Plant and Equipment				
E3	<p>All plant and equipment used on site, or to monitor the performance of the development must be:</p> <p>a) maintained in a proper and efficient condition; and</p> <p>b) operated in a proper and efficient manner.</p>		The Project only recently commenced construction	Not triggered
Community Communication Strategy				
E4	The Community Communication Strategy, as approved by the Planning Secretary, must be implemented for a minimum of 12 months following the completion of construction.		The Project only recently commenced construction	Not triggered
Operational Noise Limits				
E5	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in <i>Acoustic Assessment Report</i> prepared by GHD dated April 2018.		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
E6	Noise associated with the operation of any plant, machinery, School public address system, School bell or other equipment on the Subject Site and community use of the School hall outside of school hours, must not exceed 5 dB(A) above the background noise level when measured at the boundary of any sensitive receiver.		The Project only recently commenced construction	Not triggered
E7	The Applicant must undertake short term noise monitoring in accordance with the <i>Noise Policy for Industry</i> where valid data is collected following the commencement of use of each stage of the development. The monitoring program must be carried out by an appropriately qualified person and a monitoring report must be submitted to the Planning Secretary within two months of commencement use of each stage of the development to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in <i>Acoustic Assessment Report</i> dated April 2018. Should the noise monitoring program identify any exceedance of the recommended noise levels referred to above, the Applicant is required to implement appropriate noise attenuation measures so that operational noise levels do not exceed the recommended noise levels or provide attenuation measures at the affected noise sensitive receivers.		The Project only recently commenced construction	Not triggered
E8	Use of the school hall, performance, fitness and music facilities are not to be used between 10.00 pm and 8:00 am.		The Project only recently commenced construction	Not triggered
E9	The waste collection services are not to be undertaken outside the hours of 7:30 am to 6:00 pm Monday to Friday.		The Project only recently commenced construction	Not triggered
E10	The sports field and outdoor sports courts are not made available for community use a) During weekday mornings; b) Later than 6:00 pm on weeknights; and c) Other than between the hours of 8:00 am and 6:00 pm on Saturdays; and during Sundays and public holidays.		The Project only recently commenced construction	Not triggered
Unobstructed Driveways and Parking Areas				
E11	All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.		The Project only recently commenced construction	Not triggered
Green Travel Plan				
E12	The Green Travel Plan required by condition D12 of this consent must be updated annually and implemented.		The Project only recently commenced construction	Not triggered
Outdoor Lighting				
E13	Notwithstanding Condition D27, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	measures in consultation with affected landowners to reduce the impacts to an acceptable level.			
Fire Safety Certificate				
E14	The owner must submit to Council an Annual Fire Safety Statement, each 12 months after the final Safety Certificate is issued. The certificate must be on, or to the effect of, Council's Fire Safety Statement.		The Project only recently commenced construction	Not triggered
Landscaping				
E15	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition D36 for the duration of occupation of the development.		The Project only recently commenced construction	Not triggered
E16	To allow for diversity of local provenance native trees, shrubs and groundcover species to rehabilitate, mowing is not to occur in the eastern side of the site with the remaining native remnant vegetation.		The Project only recently commenced construction	Not triggered
Asset Protection Zones				
E17	The asset protection zones required by condition D38 shall be maintained for the duration of occupation of the development.		The Project only recently commenced construction	Not triggered


Appendix B. CEMP and Sub-plans

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Community Communications Strategy (CoC B10)				
Table 3: 1300 community information line	The free call 1300 482 651 number is published on all communication materials and is manned by SINSW. The number will be available throughout the life of the project and accessible for 12 months post completion	Tested phone number 19/06/19	The number is in operation	Compliant
Table 3: Advertising (print)	Advertising in local newspapers is undertaken with at least 7 days' notice of significant construction activities, major disruptions and opportunities to meet the project team or find out more at a face to face	-	Non-compliance: There was no evidence at the time of the audit that advertising in McArthur Paper and Wollondilly Papers had occurred	Non-compliance
Table 3: Information booths	Information booths are held locally and staffed by a project team member to answer any questions, concerns or complaints on the project. Info booths are scheduled from the early stages of project delivery through to project completion. Information booths are to be held both at the school/ neighbouring school, as well for the broad community: <ul style="list-style-type: none"> School information booths are held at school locations at times that suit parents and caregivers, with frequency to be aligned with project milestones and as required. Community information booths are usually held at local shopping centres, community centres and places that are easily accessed by the community. They are held at convenient times, such as out of work hours on weekdays and Saturday's. 	Photos of information booths held at Picton Mall and at Picton High school on 10 December 2018 and 9 May 2019.	Information booths were conducted at early stages of the Project.	Compliant
Table 3: Notifications	A4, single or double sided, printed in colour that can include FAQs if required Notifications are distributed under varying templates with different headings to suit different purposes:	Project update April 2019 https://www.scholinfrastucture.nsw.gov.au	Project updates are being distributed in	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status								
	<ul style="list-style-type: none"> Works notification are used to communicate specific information/ impacts about a project to a more targeted section of the community. This template doesn't have an image so it can be more appropriately targeted for matters like hazardous material. Project update is used when communicating milestones and higher level information to the wider community i.e. project announcement, concept design/DA lodgement, construction award, completion. Always includes the project summary, information booths/ sessions if scheduled, progress summary and contact info. <p>Distributed via letterbox drop to local residents and via the school community at least 5-7 days prior to construction activities or other milestones throughout the life of the project. Specific timings indicated in table 5 – Section 8.5.</p>	<p>w.gov.au/content/dam/infrastructure/projects/p/picton-high-school/Picton_High_School_-_project_update_April_2019.pdf</p> <p>Sighted A3 Project updates – 2000 copies were provided to Picton School staff and students and parents and caregivers 12 June 2019 and December 2018.</p>	<p>accordance with the Strategy.</p>									
<p>Table 4 – Engagement timeline</p>	<table border="1"> <thead> <tr> <th data-bbox="353 908 562 967">Project Phase / milestone</th> <th data-bbox="562 908 763 967">Target Audiences</th> <th data-bbox="763 908 965 967">Proposed communication tools as per Table 3</th> <th data-bbox="965 908 1167 967">Timing / implementation</th> </tr> </thead> <tbody> <tr> <td data-bbox="353 967 562 1241"> <p>Main Construction works, including but not limited to:</p> <ul style="list-style-type: none"> • Works commenced • Asbestos removal • Remediation (if required) • Key impact periods – noise, dust, traffic etc. </td> <td data-bbox="562 967 763 1241"> <p>School community</p> <p>Local residents</p> <p>Local Council</p> </td> <td data-bbox="763 967 965 1241"> <p>Notifications – for school community and residents</p> <p>Door knocks to directly impacted residents</p> <p>Info booths/ sessions</p> <p>Website updates</p> <p>Newsletters</p> <p>Face to face meetings</p> <p>Advertising of events and high disruption</p> </td> <td data-bbox="965 967 1167 1241"> <p>April 2019 (and at key construction events as required, as per our works notification process in Table 5, Section 8.4)</p> </td> </tr> </tbody> </table>	Project Phase / milestone	Target Audiences	Proposed communication tools as per Table 3	Timing / implementation	<p>Main Construction works, including but not limited to:</p> <ul style="list-style-type: none"> • Works commenced • Asbestos removal • Remediation (if required) • Key impact periods – noise, dust, traffic etc. 	<p>School community</p> <p>Local residents</p> <p>Local Council</p>	<p>Notifications – for school community and residents</p> <p>Door knocks to directly impacted residents</p> <p>Info booths/ sessions</p> <p>Website updates</p> <p>Newsletters</p> <p>Face to face meetings</p> <p>Advertising of events and high disruption</p>	<p>April 2019 (and at key construction events as required, as per our works notification process in Table 5, Section 8.4)</p>	<p>Refer response to the commitments in Table 3, as assessed above.</p>	<p>Refer response to the commitments in Table 3, as assessed above.</p>	<p>Compliant</p>
Project Phase / milestone	Target Audiences	Proposed communication tools as per Table 3	Timing / implementation									
<p>Main Construction works, including but not limited to:</p> <ul style="list-style-type: none"> • Works commenced • Asbestos removal • Remediation (if required) • Key impact periods – noise, dust, traffic etc. 	<p>School community</p> <p>Local residents</p> <p>Local Council</p>	<p>Notifications – for school community and residents</p> <p>Door knocks to directly impacted residents</p> <p>Info booths/ sessions</p> <p>Website updates</p> <p>Newsletters</p> <p>Face to face meetings</p> <p>Advertising of events and high disruption</p>	<p>April 2019 (and at key construction events as required, as per our works notification process in Table 5, Section 8.4)</p>									


Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Construction Environmental Management Plan (CoC B15)				
4.1 Induction	<p>The Environmental Manager (or delegate) will conduct the environmental component of the site inductions. The environmental component must cover all elements of the CEMP and would include as a minimum:</p> <ul style="list-style-type: none"> • Relevant details of the CEMP including purpose and objectives • Conditions of environmental licences, permits and approvals • Potential environmental emergencies on Site and the emergency response procedures • Reporting and notification requirements for pollution and other environmental incidents • High risk activities and associated environmental safeguards and EWMS • Working in or near environmentally sensitive areas including heritage sites • Site specific environmental management requirements and responsibilities • Surrounding sensitive land uses including aquatic activities • Mitigation measures for the control of environmental issues • Incident response (including fire) and reporting requirements. <p>A record of all environment inductions will be maintained in an Induction Register and kept on-site. The Environmental Manager may authorise amendments to the induction where required to address Project modifications, legislative changes or amendments to this CEMP or related documentation.</p>	-	Non-compliance: There was no evidence at the time of the Audit of an induction being carried out.	Non-compliant
4.1.1 Toolbox talks	<p>Toolbox talks will be used to raise awareness and educate personnel on construction related environmental issues. The toolbox talks are used to ensure environmental awareness continues throughout construction. Toolbox talks will be tailored to specific environmental issues relevant to upcoming work including (but not limited to):</p> <ul style="list-style-type: none"> • Erosion and sedimentation control • Hours of work • Emergency and spill response • Aboriginal and non-Aboriginal heritage sites and unexpected finds procedure • Threatened species and ecological communities • Clearing controls and vegetation protection • Weed management • Weather conditions • Environmental alerts • Water quality issues <ul style="list-style-type: none"> • Communication of recent regulator enforcement actions/parent company environmental alerts and lessons learnt from other projects that may be relevant to this project • Complaint management procedures • Presence of aquatic fauna and response • EWMS (for relevant personnel). <p>Toolbox talk attendance is mandatory and attendees of toolbox talks are required to sign an attendance form and records maintained in a Training Register.</p>	TBT 07/03/19 – 13/06/19	Toolbox talks are being carried out regularly and are covering risks and controls relevant to the works being carried out including access, dust, exclusion zones, asbestos, traffic, hours of work and respite.	Compliant


Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
4.1.2 Daily pre-starts	Daily pre-start meetings will be used to inform the workforce of the day's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the work, coordination issue with other trades, hazards and other information that may be relevant to the day's work. The Foreman, or other appropriate site staff member, will conduct a daily pre-start meeting with the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. Pre-start meetings may be pro wide and/or held for specific work areas. Daily pre-start meetings are generally succinct in nature and take approximately 10-15 minutes.			
5.4.1 Inspection	<p>Regular inspections will be carried out during construction of the Project area by the construction/environmental team. Details are described in the following sections. Copies of all environmental inspection reports prepared by construction environmental staff will be kept with the project records and closed out within the agreed timeframes</p> <p>Inspections would be undertaken pre and post rainfall, where required, to evaluate the effectiveness of the environmental controls. Pre-rainfall inspections are undertaken to prepare for significant rainfall events whereas, post rainfall inspections are undertaken after more than 20mm of rain in a 24-hour period measured at the on-site weather station. The Environmental Coordinator records inspection findings on an inspection checklist form or software application.</p> <p>Observed deficiencies in maintenance, environmental controls or standard of environmental performance are recorded on the checklist form. Details of any maintenance required, the nature of the deficiency, any actions required, and an implementation priority will be recorded. Actions will be closed out in accordance with the identified priority and evidence of close out would be kept on file.</p>	Taylor inspection forms 24/5/19, 15/05/19, 09/05/19	Inspections are being carried out regularly and include environmental checks.	Compliant
Construction Traffic and Pedestrian Management Plan (CoC B17)				
3.6 VMP	<p>It is proposed that construction vehicles will generally:</p> <ul style="list-style-type: none"> • Arrive at the site travelling from Argyle Street; • Enter the site via the northern access. • Unload and load materials / equipment's within the site; and • Depart the site through the northern access into the bus area and exiting via the Southern Access to Argyle Street. 	Site inspection 19/06/19	The site layout, including access and laydown, is consistent with the VMP in the CTPMSP	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>The proposed construction vehicle movement plan accessing and leaving the site is shown in Figure 3-1</p>  <p>Figure 3-1 Construction Vehicle Movement Plan¹</p>			
3.7 Driver Code of Conduct	<p>Management of vehicular access to and from the site is essential in order to maintain the safety of the general public as well as the labour force. The following code is to be implemented as a measure to maintain safety within the site:</p> <ul style="list-style-type: none"> • Utilisation of only the designated transport routes; • Drivers to operate during the specified working hours; • Drivers to maintain a sufficient distance from any temporary barriers that may be implemented and trees that form part of the endangered plant community; and • Construction vehicle movements are to abide by finalised schedules as agreed by the relevant authorities. 	<p>TBT 14/03/19, 05/03/19, 29/03/19, 22/03/19, 17/05/19</p> <p>Site inspection 19/06/19</p>	<p>Traffic and access arrangements and requirements are regularly communicated to the workforce. No issues observed on site.</p>	Compliant
3.8.1 Work Zone Permit	<p>An application for a works zone will be submitted to Council for approval, if required. This would be a separate application to the Construction Traffic Management Plan.</p>	<p>ROL 201.2019.0000002 4.001</p>	<p>A Road Occupancy Licence was granted by Council for</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		TCP 30/05/19 prepared by licenced traffic controller	Wonga Road works. A TCP No other work zone permits required for current works.	
3.8.2 ROL	A Road Occupancy Licence 'ROL' will be submitted to the relevant authorities when works are within the road carriageway. A ROL is required for any activity likely to impact on traffic flow, even if that activity takes place off-road. Council are the assessing authority depending on the responsibility.	ROL 201.2019.0000002 4.001 TCP 30/05/19 prepared by licenced traffic controller	A Road Occupancy Licence was granted by Council for Wonga Road works. A TCP No other work zone permits required for current works.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
3.15.1 Construction Parking	<p>It is estimated that up to 120 contractors will be on-site. Construction workers will have access to the northern school car park throughout the duration of the Construction Works, as shown in Figure 3-3.</p>  <p>Figure 3-3: Construction Staff Parking</p>	Site inspection 19/06/19	The site arrangement is such that parking is consistent with the layout shown in Section 3.15.1 of the CTPMSP	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
3.15.3 School Parking	<p>School staff will have access to the southern car park throughout the duration of the construction works shown in Figure 3-5.</p>  <p>Figure 3-5: School Staff Parking</p> <p>In addition, additional on-street parking is also available along Wonga Road and Argyle Street. There maximum of 184 on-street parking spaces along Argyle Street and Wonga Road, further details of available parking spaces is provided in Section 2.4.</p>	Site inspection 19/06/19	The site arrangement is such that parking is consistent with the layout shown in Section 3.15.3 of the CTPMSP	Compliant
3.16 Staff access and delivery vehicles	<p>Staff will have access to the southern car park via Argyle Street and Wonga Road. A new entry and exit access will run along the southern boundary of the site connecting Wonga Road to the southern car park. A new (entry only) access will be located on Argyle Street, as shown in Figure 3-6.</p> <p>Deliveries to the site will be very low and infrequent. Delivery vehicles will enter and exit the site via the driveway access on Wonga Road.</p>	Site inspection 19/06/19	The site arrangement is such that access for staff and deliveries is consistent with the layout shown in Section 3.16 of the CTPMSP	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	 <p data-bbox="367 1018 745 1038">Figure 3-4: Staff and Delivery Vehicle Access</p>			
3.17 Drop off and pick up	<p data-bbox="360 1086 1234 1174">The parents drop off and pick up area will continue to occur along Argyle Street, as per the current arrangements. There will be a new School access fronting the parents drop off and pick up area. The School Access on Argyle Street and a footpath connection via the northern side of the Hall Building will be provided for access to the School grounds. This will be the main drop off and pick up point.</p> <p data-bbox="360 1182 1234 1225">Parents will continually be advised by the Schools newsletter of the designated pick up and drop off along Argyle Street.</p>	Site inspection 19/06/19	The site arrangement is such that drop off and pick up arrangements are consistent with the layout shown in Section 3.17 of the CTPMSP.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			<p>Observation: whilst the layout is compliant, it was communicated by the Project team and Council that some parents have shifted the drop off and pick up</p>	
3.18 Pedestrian safety	<p>During the construction activities and the operations of the Temporary School, a traffic controller / staff will assist in the safety of pedestrian movements at the main access to avoid conflicts with bus and vehicle movements.</p>	<p>Site inspection 19/06/19</p> <p>Contract preliminaries DoEAMD 17 668</p>	<p>Sighted traffic controllers at gate where bus bay and construction vehicle access point exists.</p> <p>Contract preliminaries DoEAMD 17 668 states that deliveries during peak drop off and pick up times to be reduced.</p> <p>No issues.</p>	Compliant
Construction Noise and Vibration Management Plan (CoC B18)				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
8.1.2 Excavators and bulldozers	<p>Excavators and bulldozers are expected to be used for the majority of the time during the demolition and excavation periods. Where prolonged use is necessary, this equipment/machinery could be moved to another part of the site to offer the receiver closest to the plant some respite. Management processes include;</p> <ul style="list-style-type: none"> We recommend commencing all noisy excavation works within 40-meters of an residential property boundary on site only after 8am, providing a 1-hour respite period during the morning period from the 7am standard hours of construction. All surrounding receivers will be notified of the duration and extent of the works proposed during the excavation stage via letterbox drops, with a detailed engagement plan and contact information for all relevant persons on site. We Note: SINSW have a Community Liaison Team especially dedicated to addressing complaints and notifying receivers. 	<p>Site inspection 19/06/19</p> <p>Project update April 2019</p> <p>'Traffic light report' daily noise indicator 17/6/19.</p>	<p>Currently no excavators working within 40m of nearest receivers</p> <p>Sighted signage in the field about noise reduction.</p> <p>No dozers on site during inspection.</p>	Compliant
8.1.3 jackhammers , angle grinders and electric saws	<p>Hammering will typically produce the loudest noise levels emanating from the site and have the highest potential noise impacts on surrounding receivers. Hand tools would only be typically used sporadically. However, where extensive use of these items would occur noise emissions should be managed. Management processes will include:</p> <ul style="list-style-type: none"> Notification of potentially affected receivers of the duration and extent of the works proposed via letterbox drops, with a detailed engagement plan and contact information for all relevant personnel on site. We recommend commencing all works involving the use of jackhammers, electric saw and angle grinders within 40-meters of an residential property boundary on site only after 8am, providing a 1-hour respite period during the morning period from the 7am standard hours of construction. 	<p>TBT 03/06/19 and 13/06/19</p> <p>Site inspection 19/06/19</p> <p>Interview with auditees 19/06/19</p>	<p>TBT 3/6/19 and 13/6/19 include hours restricted as per CoC C7.</p> <p>No hammering has occurred on the project thus far.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
11.2 complaints	<p>Should ongoing complaints of excessive noise or vibration criteria occur immediate measures shall be undertaken investigate the complaint, the cause of the exceedances and identify the required changes to work practices. In the case of exceedances of the vibration limits all work potentially producing vibration shall cease until the exceedance is investigated.</p> <p>The effectiveness of any changes shall be verified before continuing. Documentation and training of site staff shall occur to ensure the practices that produced the exceedances are not repeated.</p> <p>If a noise complaint is received the complaint should be recorded on a Noise Complaint Form. The complaint form should list:</p> <ul style="list-style-type: none"> • The name and address of the complainant (if provided); • The time and date the complaint was received; • The nature of the complaint and the time and date the noise was heard; • The name of the employee who received the complaint; • Actions taken to investigate the complaint, and a summary of the results of the investigation; • Required remedial action, if required; • Validation of the remedial action; and • Summary of feedback to the complainant. <p>A permanent register of complaints should be held. All complaints received should be fully investigated and reported to management. The complainant should also be notified of the results and actions arising from the investigation.</p>	<p>Complaints register https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/p/picton-high-school/Complaints_register_PictonHS.pdf</p>	<p>A complaints register is being maintained as per this commitment.</p>	Compliant

9 control of noise and vibration

The flow chart presented in Figure 4 illustrates the process that will be followed in assessing construction activities.

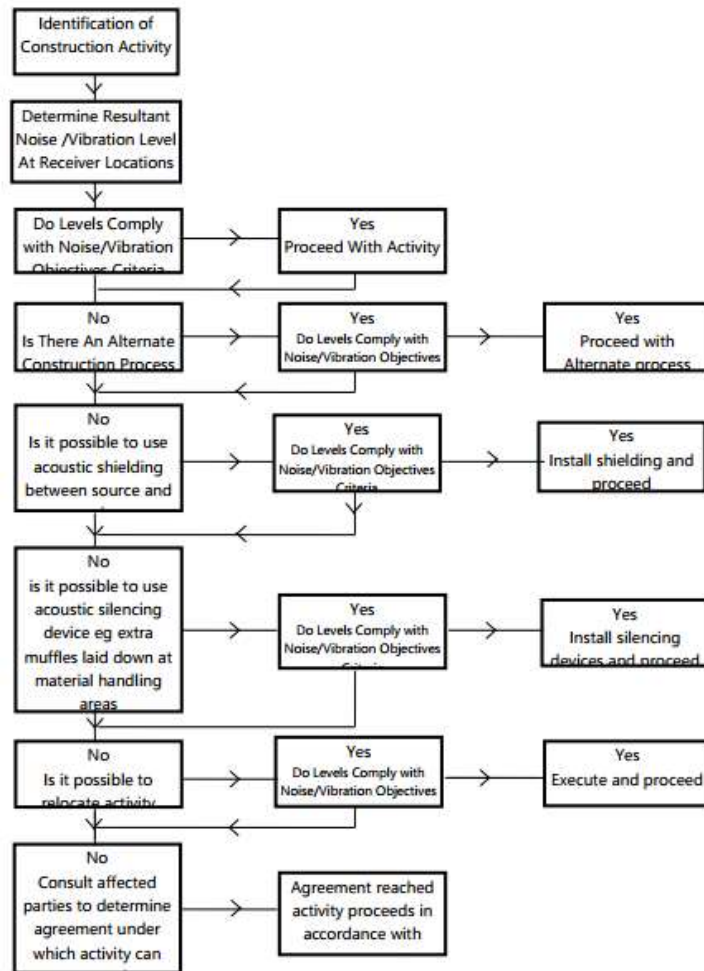


Figure 3 – Process Flowchart

Acoustic Logic noise monitoring report 05/06/19

‘Traffic light report’ daily noise indicator 17/6/19. This presents the predicted noise impacts for each day of the week and is discussed with the School.

‘Traffic light report’ submission to Picton High School (PHS) 17/6/19.

Summary of discussion between PHS Deputy Principal and Business Manager 13/6/19 which identifies that scheduling of works.

‘Traffic light report’ for 6/6/19 and submission to PHS business manager and the Principal. The report identifies days of high noise. there were no

Reasonable and feasible measures are being applied on site independent of this process.

Observation: whilst the project team is implementing noise and vibration mitigation measures on the Project, these are happening without the support of ongoing noise monitoring or modelling. The risk of this approach is the over or under servicing of mitigations in lieu of reliable data. It is recommended that the Project consider engagement of an acoustic consultant to assess various packages of work and therefore inform the decision

Compliant

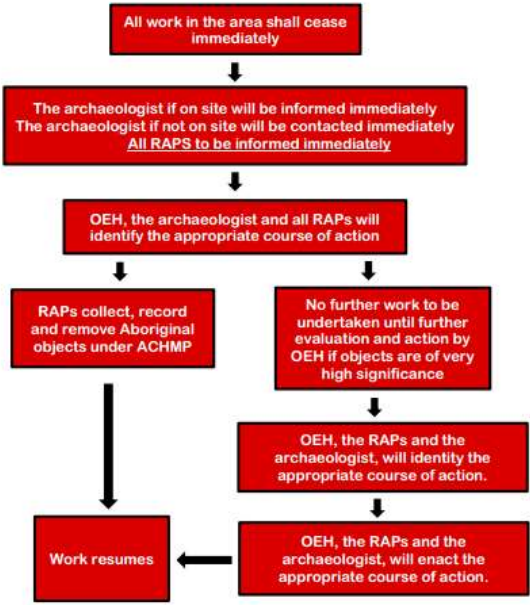
Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		responses from PHS.	making tree in section 9 of the CNVMSP. The auditees indicated that Vibration loggers x 2 are out near the temporary school. They were installed 3/6/19 prior to removal of the slab of adjacent. There was no evidence to support this.	
Construction Waste Management Plan (CoC B19)				
7.1	Any person with management or control of a facility/workplace must ensure an asbestos register is prepared and kept at the facility/workplace. The asbestos register must be maintained, to ensure the information in the register is up-to-date.	Hazmat register for prior to works C120714: J159280	The register contained all hazmat items present on site, which have since been removed. Observation: The register needs updating following completion of asbestos removal works on site.	Compliant
G11	A waste register would be maintained, detailing types of waste collected, amounts, date/time and details of disposal.	-	Non-compliance: No evidence was available at the	Non-compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			time of the audit that a waste register was being maintained.	
G12	Waste would be managed and disposed of in accordance with the PoEO Act and the WRAPP. Wastes that are unable to be reused or recycled would be disposed of offsite at a licensed waste management facility, or premises lawfully permitted to accept the materials following classification.	-	Non-compliance: There was no evidence available at the time of the audit that material had been classified and managed in accordance with the waste classification guidelines.	Non-compliant
G13	Oils and other hazardous liquids would be labelled and stored in a sealed container within a bunded area. Material collected from within bunded areas will be disposed of offsite at an appropriately licenced waste facility	Site inspection 19/06/19	Sighted hazardous chemicals storage container. It is bunded and secured.	Compliant
Construction Soil and Water Management Plan (CoC B20)				
5.6 Dirty Water treatment and discharge	Water accumulation in sediment traps, sumps, trenches, excavations or in any other low points on site can either be:	Project Erosion and Sediment Control Plan Site inspection 19/06/19	There are no locations on the site that currently required active pumping. All controls are passive controls.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> • re-used for dust suppression or construction purposes; or • Pumped into a tank, truck or other holding area for later treatment; or • Treated (If required) and tested in situ, then released off site once it meets the required water quality discharge criteria (see below); or • Any such discharge of water from the project (i.e. where water is moved off site once it meets the required water quality discharge criteria (see below); or • Any active discharge of water from the project (i.e. where water is moved offsite via direct action such as pumping rather than flowing off the project (i.e where water is moved offsite via direct action such as pumping rather than flowing off the project as a result of heavy rainfall is to achieve: <ul style="list-style-type: none"> – 50mg/L or less Total Suspended Sediment (TSS) – pH 6.5 to 8.5 and – hydrocarbon sheens, no visible trace • Discharge of any site water to the environment or for reuse on site is to be managed through the approved procedure. • Adequate water quality can be achieved by using gypsum at a rate of approximately 30 kilgram per 100m³ of stormwater. Alternative flocculating agents can only be used if the regulating authority has granted approval. Refer to manufacturer’s guidelines. • Sediment traps must be emptied within 5 calendar days of rainfall event. This includes treating water testing to confirm adequate quality, de-watering and, if required de-silting. • These de-watering requirements apply to site water accumulating in any sort of excavation, trench, or other ponded water body on the site. • If water is going to be used within the site for dust-suppression or construction purposes and will drain back into the sediment capture system, it does not require treatment. 		<p>There has been no need to pump water off site.</p> <p>Observation: The requirements set out in this Section of the CSWMSP do not reflect CoC C28. Refer response to CoC C28.</p>	

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
5.8 Rainfall inspection procedure	<p>The weather forecast is to be monitored regularly (at least daily and hourly when rainfall imminent). By the site foreman, Environmental Manager (or their representative).</p> <p>The sump and containment wall available capacity is to be continually assessed and volume/level increased as required to appropriately manage the expected rainfall (in accordance with construction detail).</p> <p>Prior to forecast rainfall (> 50% chance of 10mm or more over 24 hours), the following will occur:</p> <ul style="list-style-type: none"> All exposed batters not draining to sediment basin or sump (i.e. exposed site compound surfaces or batter surfaces adjacent to Ivanhoe PI or the nearby creek) are to be stabilised with temporary ground covers (i.e. vital stonewall, P47, geotextile or black plastic or equivalent) Batter chutes and check dams are to be installed (if not already in place) Progressive ESCPs to detail batter chute locations. 	TBT 07/03/19, 03/06/19	The toolbox talks identify weather erosion and sediment control matters.	Compliant
6 Recommendations	<p>It is the contractor's responsibility to prepare detailed erosion and sediment control plans noting the above recommendations and the following measures:</p> <p>Nomination of a suitably qualified environmental representative on site to complete self-audits and monitor Soil and Water Management Plans.</p> <ul style="list-style-type: none"> Implementation of this plan and responsibility for nomination of a suitably qualified environmental representative to ensure on going monitoring, maintenance and prevention of pollution is the responsibility of the contractor. A progressive erosion and sediment control plan is to be prepared for the works should be developed progressively through the constructing phase. PESCP's should be in accordance with the requirements of Managing Urban Stormwater: Soils and Construction (Landcom, 2004) and Managing Urban Stormwater-Volume 2D Main Road Construction (DECC, 2008) In locations where proposed post-redevelopment water quality basins are planned outside the demolition footprint, demolition phase sediment basins or other sediment control elements may be located in these places during demolition phase, subject to designs being compatible with subsequent post-redevelopment water treatment requirements Sizing of detailed demolition sub-catchments may need to be further defined once detailed demolition staging planning is underway. Provision for potentially larger up gradient stormwater catchments may need to be considered during higher erosion risk activities, such as redirecting live stormwater assists, changes to pavement drainage, or when bridge deck surface water is connected site water. 	<p>Project Erosion and Sediment Control Plan</p> <p>Site inspection 19/06/19</p>	The ERSED Plan was consistent with the concept plan prepared under the CSWMSP, which captures Blue Book recommendations. Site controls reflected the Plan.	Compliant
Aboriginal Cultural Heritage Management Sub-Plan (CoC B21)				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
6.0 Recommendations	<p>The recommendations have been formulated after consultation with RAPs, the proponent and the OEH;</p> <ul style="list-style-type: none"> ➤ Consideration should be given to the recommendations of D'harawal Traditional Descendents' and Knowledgeholders' Circle in regard to the native vegetation of the area, including the request for a detailed botanical survey, protection of existing native flora where possible, planting of healthy native (to the region) specimens, including Turpentine, Forest Red Gum, Stringy Bark and Ironbark species and that consultation continue with RAPs regarding the landscaping of the development as part of this Aboriginal Cultural Heritage Management Plan. ➤ Before any ground disturbance takes place all development staff, contractor and workers should be briefed prior to works commencing on site, as to the status of the area and their responsibilities in ensuring preservation of the said area. They should also be informed of their responsibilities regarding any Indigenous archaeological deposits and/or objects that may be located during the following development; 	-	<p>Non-compliance: There was no evidence available at the time of the audit to demonstrate fulfilment of these commitments.</p>	Non-compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
6.1 Unexpected finds	<p>6.1 FLOW CHART FOR THE DISCOVERY OF UNEXPECTED ABORIGINAL ARCHAEOLOGICAL MATERIAL</p>  <pre> graph TD A[All work in the area shall cease immediately] --> B[The archaeologist if on site will be informed immediately The archaeologist if not on site will be contacted immediately All RAPS to be informed immediately] B --> C[OEH, the archaeologist and all RAPS will identify the appropriate course of action] C --> D[RAPS collect, record and remove Aboriginal objects under ACHMP] C --> E[No further work to be undertaken until further evaluation and action by OEH if objects are of very high significance] D --> F[Work resumes] E --> G[OEH, the RAPS and the archaeologist, will identify the appropriate course of action.] G --> H[OEH, the RAPS and the archaeologist, will enact the appropriate course of action.] H --> F </pre>	Interview with auditees 19/06/19	No unexpected finds were identified by the Project team.	Not triggered.

Appendix C. Planning Secretary agreement of Independent Auditors



Planning & Environment

Department of Education
ATTN: Mr Michael Kavanagh
Project Director, Infrastructure Projects
Level 8, 259 George Street,
Sydney, NSW 2000

Contact: Khalid Abubaker
Phone: 02 8572 1096
Email: compliance@planning.nsw.gov.au

Dear Mr Kavanagh

Picton High School Redevelopment (SSD 8640) Condition C38

Reference is made to a submission, dated 2 May 2019, seeking the agreement of the Secretary of the Department of Planning and Environment (the Department) of a suitability of qualified, experienced and independent audit team to undertake independent audits of the Picton High School Redevelopment (SSD 8640) ("Project").

In accordance with Schedule 2, Part C, Condition C38 and the *Independent Audit Post Approvals Requirements* (Department 2018), the Secretary has agreed to the following audit team:

- Lead Auditor - Steve Fermio; and
- Auditor - Derek Low.

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.

If you have any questions, please contact Khalid Abubaker on the details listed above.

Yours sincerely

Kate Moore

03/05/2019

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

Appendix D. Consultation records

Derek Low

From: Derek Low
Sent: Wednesday, 12 June 2019 10:14 PM
To: 'stakeholder.relations@transport.nsw.gov.au'
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi there.

I am one of the DPE approved Independent Auditors on the Picton High School Redevelopment (SSD 8640).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8640

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf>

The audit is scheduled to occur on 19 June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the TfNSW on the scope of the audit. I understand the TfNSW provided advice during the assessment phase with regards to travel, traffic, parking and access. These were considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Consent along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

In providing input to the scope, I kindly request TfNSW confirm if it any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. I look forward to hearing from you.

Derek Low
Principal Environmental Consultant



E: dlow@wolfpeak.com.au

P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

www.wolfpeak.com.au



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Derek Low

From: Michael Buckley <Michael.Buckley@wollondilly.nsw.gov.au>
Sent: Thursday, 13 June 2019 2:04 PM
To: Derek Low
Cc: Norma Toweel
Subject: RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Derek.

I referred your email to Council Engineering/Infrastructure section to comment. Please find comments below from Ms Norma Toweel – Infrastructure Coordinator.

Comments for traffic management issues during construction phase:

- *Pedestrian Access during Construction – in reply to concerns raised by Council prior to commencement requesting footpaths along Wonga Road – the comments stated that there was no proposed pedestrian access to the school from Wonga Road – this is not the case. All pedestrian access during school hours is now via the gate at the back of the school off Wonga Road. The main entrance is locked for security reasons. Any students arriving late, visitors and students’ /parents for the support classes are all parking and accessing the school via Wonga Road. (SSD17_8640 Response to Submissions Table by Ethos Urban)*

A footpath be built along Wonga Road on the school side for safety reasons

There is no proposed pedestrian school. All pedestrian access is

- *The increased demand for parking near the school gate at the back of the school off Wonga Road has led to frustration and numerous complaints to Council from parents for the lack of infrastructure and forward thinking to provide a drop off zone. Again – Council were never made aware of the access point to the school being from Wonga Road during school hours or the need for access to the Support Classes from this road. The lack of footpath or even formed road at the end of Wonga road has led to safety concerns with the mixing of pedestrian and vehicle movements. Council has had to install “No Parking” signs around the informal turn circle on the unformed road to prevent parents double and triple parking in the area, blocking driveway access and creating a hazard to the many students who are now using this gate to gain access to their vehicles parked on Wonga Road.*
- *As construction of the bus bay and turn circle is due to commence shortly – Council is concerned with the interaction of road construction vehicles, pedestrians and parent drop off requirements to gain access to the gate off Wonga Road – putting further demand on Council to provide parking and pedestrian facilities. This should have been addressed as part of the development assessment.*
- *Council have had to close and lock the gate on the unformed section of Wonga Road in the interest of public safety. Teachers, Contractors and visitors where using this space as an informal parking area - and access point to the Ag plot at the northern corner of the school site. The gate to the Ag plot is actually off an un- remediated tip site, and not road reserve – and as such is not to be used for access to the school site.*

Regards, Michael



Michael Buckley
Development Assessment Team Leader

T 0246779614
A P.O. Box 21 Picton, NSW, 2571
E Michael.Buckley@wollondilly.nsw.gov.au
W <http://www.wollondilly.nsw.gov.au>



From: Derek Low [mailto:dlow@wolfpeak.com.au]
Sent: Wednesday, 12 June 2019 10:05 PM
To: Wollondilly Shire Council <council@wollondilly.nsw.gov.au>
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi there.

I am one of the DPE approved Independent Auditors on the Picton High School Redevelopment (SSD 8640).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8640

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf>

The audit is scheduled to occur on 19 June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the Wollondilly Shire Council on the scope of the audit. I understand the Council provided advice during the assessment phase with regards to traffic and access, contamination and noise. These were considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Consent along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

In providing input to the scope, I kindly request Council confirm if it any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. I look forward to hearing from you.

Derek Low
Principal Environmental Consultant



E: dlow@wolfpeak.com.au

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Derek Low

From: Wollondilly Shire Council <council@wollondilly.nsw.gov.au>
Sent: Wednesday, 12 June 2019 10:05 PM
To: Derek Low
Subject: Wollondilly Shire Council Acknowledgement - PLEASE DO NOT REPLY TO THIS EMAIL
Independent Audit of Picton High School Redevelopment (SSD 8640)

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Phone: 02 4677 1100

PICTON.



From: dlow@wolfpeak.com.au
Sent: 6/12/2019 10:04:39 PM +10:00
To: council@wollondilly.nsw.gov.au
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)
Hi there.

I am one of the DPE approved Independent Auditors on the Picton High School Redevelopment (SSD 8640).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8640

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf>

The audit is scheduled to occur on 19 June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the Wollondilly Shire Council on the scope of the audit. I understand the Council provided advice during the assessment phase with regards to traffic and access, contamination and noise. These were considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Consent along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

In providing input to the scope, I kindly request Council confirm if it any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. I look forward to hearing from you.

Derek Low
Principal Environmental Consultant



E: dlow@wolfpeak.com.au

P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

www.wolfpeak.com.au



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Derek Low

From: Derek Low
Sent: Wednesday, 12 June 2019 10:05 PM
To: 'council@wollondilly.nsw.gov.au'
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi there.

I am one of the DPE approved Independent Auditors on the Picton High School Redevelopment (SSD 8640).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

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Any questions please let me know. I look forward to hearing from you.

Derek Low

Principal Environmental Consultant



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Derek Low

From: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Sent: Wednesday, 12 June 2019 8:49 AM
To: Derek Low
Subject: Automatic Response

Follow Up Flag: FollowUp
Due By: Wednesday, 12 June 2019 8:30 PM
Flag Status: Completed

Thank you for contacting the NSW Department of Planning and Environment's Compliance Team. We have received your email which will be forwarded to the appropriate officer for attention.

If your matter relates to a complaint, we will contact you within 14 days seeking further information or to provide you with the status/outcome of our investigation.

Kind regards,

Compliance Team
NSW Department of Planning and Environment
320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T 1300 305 695
E compliance@planning.nsw.gov.au

Derek Low

From: Derek Low
Sent: Wednesday, 12 June 2019 8:48 AM
To: compliance@planning.nsw.gov.au; Kate Moore (DPE)
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640) - Att: Kate Moore

Follow Up Flag: Follow up
Due By: Wednesday, 12 June 2019 8:30 PM
Flag Status: Flagged

Hi Kate.

I am one of the DPE approved Independent Auditors on the Picton High School Redevelopment (SSD 8640).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

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The audit is scheduled to occur on 19 June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the DPE on the scope of the audit.

We kindly request DPE confirm if it any key issues it would like examined.

Any questions please let me know. I look forward to hearing from you.

Derek Low

Principal Environmental Consultant



E: dlow@wolfpeak.com.au

P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

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Derek Low

From: Environment Line <info@environment.nsw.gov.au>
Sent: Wednesday, 12 June 2019 10:09 PM
To: Derek Low
Subject: Thank you for your email. Your Reference Id is 00856581 (ref:_00D7F6iTix._5007Fil3Tf:ref)



Thank you for your enquiry. The Office of Environment and Heritage (OEH) and the NSW Environment Protection Authority (EPA) will respond to simple requests and enquiries within 5 working days. For enquiries or requests that are more involved or technical, a longer response time may be necessary. If you have not already visited our websites and wish to do so, please go to www.environment.nsw.gov.au or www.epa.nsw.gov.au

If you are emailing to report an urgent pollution incident, please call 131 555 (press option 1).

Please note that in sending us an email, we will record your email address for the purpose of responding to your enquiry. If your email requires a transaction or another more detailed service, we may record the personal details you supply, or request further details from you in order to provide the service you have requested. Where this is not necessary you can request your details remain anonymous or confidential. Details of our Privacy information can be found on the website at www.environment.nsw.gov.au/whoweare/privacy.htm.

When sending further emails about this topic (Independent Audit of Picton High School Redevelopment (SSD 8640)), please ensure the following extended Reference Id appears anywhere in the email subject or body:

ref:_00D7F6iTix._5007Fil3Tf:ref

Derek Low

From: Derek Low
Sent: Wednesday, 12 June 2019 10:09 PM
To: 'info@epa.nsw.gov.au'
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi there.

I am one of the DPE approved Independent Auditors on the Picton High School Redevelopment (SSD 8640).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

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http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8640

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The audit is scheduled to occur on 19 June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the EPA on the scope of the audit. I understand the EPA provided advice during the assessment phase with regards to general construction impacts, further investigations for contamination, odour, pesticides, and sustainability objectives. These were considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Consent along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

In providing input to the scope, I kindly request EPA confirm if it any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. I look forward to hearing from you.

Derek Low

Principal Environmental Consultant



E: dlow@wolfpeak.com.au

P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

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Derek Low

From: Anna London <Anna.London@environment.nsw.gov.au>
Sent: Thursday, 20 June 2019 4:39 PM
To: Derek Low
Subject: RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Derek,

Further to our conversation this afternoon, as no State listed heritage items were impacted the Heritage Council of NSW did not recommend conditions. While it is noted that an unexpected finds condition was included in the approval, this is a standard heritage condition which provides guidance to proponents and which was imposed by DPE. As a result we have no particular comments to direct the scope of your post approval audit.

If you need anything further, please do not hesitate to contact me.

Regards,

Anna

Anna London
Senior Customer Strategies Officer
Heritage Division
Office of Environment & Heritage
9873 8608

From: Derek Low <dlow@wolfpeak.com.au>
Sent: Wednesday, 12 June 2019 10:16 PM
To: INFOEnvironment <info@environment.nsw.gov.au>; OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi there.

I am one of the DPE approved Independent Auditors on the Picton High School Redevelopment (SSD 8640).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

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The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf>

The audit is scheduled to occur on 19 June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the OEH (Operations and Heritage) on the scope of the audit. I understand the OEH provided advice during the assessment phase with regards to European heritage, biodiversity and flooding. These were considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Consent along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

In providing input to the scope, I kindly request OEH confirm if it any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. I look forward to hearing from you.

Derek Low

Principal Environmental Consultant



E: dlow@wolfpeak.com.au

P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

www.wolfpeak.com.au



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Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

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Derek Low

From: OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>
Sent: Wednesday, 12 June 2019 10:16 PM
To: Derek Low
Subject: Automated Response
Attachments: image001.png

Thank you for your email to the Heritage Division of the Office of Environment and Heritage. We will respond to your request as soon as possible.

If you have submitted an application under the *Heritage Act 1977*, it will be checked for completeness and allocated to the appropriate assessment team. An officer will contact you if any additional information is required. Completeness checks are generally completed within 7 days.

The Heritage Division aims to process applications within the timeframes below, which will commence once an application is considered complete.

Application Type	Timeframe
Development application referrals	28 days
Integrated Development Applications (IDAs)	21 days (following receipt of submissions from local council, or advice that no submissions were received)
Planning proposals	21 days
Section 57(2) Exemption Notification	14 days
Section 60 / 65A	40 days (or 60 days if advertised)
s4.55 modification (formerly Section 96)	21 days (following receipt of submissions from local council)
Section 139 Exceptions	21 days
Section 140	21 days

If your email relates to Aboriginal cultural heritage, or biodiversity, you will need to forward your email to the Communities and Greater Sydney Delivery Division at gs.ach@environment.nsw.gov.au.

Alternatively, the postal address for Aboriginal Cultural Heritage is:

Communities and Greater Sydney Division
Office of Environment and Heritage
PO Box 644
Parramatta NSW 2124

Further information is also available at www.environment.nsw.gov.au/heritage/.

Sincerely



Office of
Environment
& Heritage

Customer Strategies
Heritage Division

Locked Bag 5020, Parramatta 2124
T 02 9873 8500

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Derek Low

From: Environment Line <info@environment.nsw.gov.au>
Sent: Wednesday, 12 June 2019 10:16 PM
To: Derek Low
Subject: Thank you for your email. Your Reference Id is 00856582 (ref:_00D7F6iTix._5007Fil3V7:ref)



Thank you for your enquiry. The Office of Environment and Heritage (OEH) and the NSW Environment Protection Authority (EPA) will respond to simple requests and enquiries within 5 working days. For enquiries or requests that are more involved or technical, a longer response time may be necessary. If you have not already visited our websites and wish to do so, please go to www.environment.nsw.gov.au or www.epa.nsw.gov.au

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When sending further emails about this topic (Independent Audit of Picton High School Redevelopment (SSD 8640)), please ensure the following extended Reference Id appears anywhere in the email subject or body:

ref:_00D7F6iTix._5007Fil3V7:ref

Derek Low

From: Derek Low
Sent: Wednesday, 12 June 2019 10:16 PM
To: 'info@environment.nsw.gov.au'; 'HERITAGEMailbox@environment.nsw.gov.au'
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi there.

I am one of the DPE approved Independent Auditors on the Picton High School Redevelopment (SSD 8640).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

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Any questions please let me know. I look forward to hearing from you.

Derek Low

Principal Environmental Consultant



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Derek Low

From: David Boverman <David.Boverman@rfs.nsw.gov.au>
Sent: Tuesday, 18 June 2019 8:27 AM
To: Derek Low
Cc: Martha Dotter; Corey Shackleton
Subject: FW: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Derek,

Thank you for your email to us and for asking if there was anything else we would like to see in your audit.

Martha has articulated our views and I concur with her email.

The only thing I would add would be to assess whether all relevant developments were referred to the NSW RFS for our comments, and to also determine the legislative context of each proposed development, noting that if a development is a Special Fire Protection Purpose under section 100B of the Rural Fires Act then it cannot be complying development (ie if section 100B applies to the project in question).

If you have any questions or wish to discuss please let me know.

Kind Regards,
David



David Boverman | Manager | Development Planning & Policy
NSW RURAL FIRE SERVICE
Headquarters 4 Murray Rose Avenue Olympic Park 2127 | Locked Bag 17 Granville NSW 2142
P 02 8741 5445 **F** 02 8741 5433 **M** 0458 715 952 **E** david.boverman@rfs.nsw.gov.au
24 Hour Media Enquires 02 9898 1855
www.rfs.nsw.gov.au | www.facebook.com/nswrfs | www.twitter.com/nswrfs
PREPARE. ACT. SURVIVE.

From: Martha Dotter
Sent: Friday, 14 June 2019 5:16 PM
To: dlow@wolfpeak.com.au
Subject: FW: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Derek

As you would be aware the NSW RFS provides recommended conditions for SSD when they are referred to us by the approval authority, usually for being located on, or near bush fire prone land.

The NSW RFS does not have a compliance role under the legislation and is not a certifying authority.

Notwithstanding, the NSW RFS notes the role you have outlined above and supports the idea of ensuring SSD is subject to processes that can potentially improve their level of bushfire protection, including:

- (a) Determining what, if any of our recommended conditions provided to the approval authority were adopted into an approval document; and

- (b) Ensuring that any adopted conditions in the approval were appropriately complied with throughout the construction and subsequent occupation phases of the development.

As mentioned above it is not the role of the Planning and Environment Services (PES) to undertake or assist in compliance auditing.

The NSW RFS is the lead combat agency in NSW for bushfires and is also responsible for a number of other services that increase community resilience (including for schools). These include engaging with schools to improve their level of bush fire awareness (ie assist with preparing emergency and evacuation plans etc). During your audit process if any of the sites wish to contact the NSW RFS for assistance with regard to increasing their level of bushfire protection, I would refer you to the Southern Highlands District office Southern.Highlands@rfs.nsw.gov.au for further information.

If you have any further queries regarding the conditions of any approval that have originated from the NSW RFS , please contact myself.

Regards
Martha



Martha Dotter | A/Team Leader Development Assessment and Planning

Mon-Wed 4472 0613

Thur-Fri 4474 2855

Planning and Environment Services Batemans Bay

NSW RURAL FIRE SERVICE

Locked Bag 17 Granville NSW 2142

P 02 4472 0600 **F** 02 4472 0690 **E** Martha.Dotter@rfs.nsw.gov.au

www.rfs.nsw.gov.au | www.facebook.com/nswrfs | www.twitter.com/nswrfs

PREPARE. ACT. SURVIVE.

From: Derek Low <dlow@wolfpeak.com.au>

Sent: Wednesday, 12 June 2019 10:12 PM

To: Webmaster <webmaster@rfs.nsw.gov.au>

Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi there.

I am one of the DPE approved Independent Auditors on the Picton High School Redevelopment (SSD 8640).

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The audit is scheduled to occur on 19 June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the RFS on the scope of the audit. I understand the RFS provided advice during the assessment phase with regards to bushfire protection and response. These were considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Consent along with all post approval documents prepared to satisfy the Conditions of Consent, including an

assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

In providing input to the scope, I kindly request RFS confirm if it any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. I look forward to hearing from you.

Derek Low

Principal Environmental Consultant



E: dlow@wolfpeak.com.au

P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

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Derek Low

From: Martha Dotter <Martha.Dotter@rfs.nsw.gov.au>
Sent: Friday, 14 June 2019 5:16 PM
To: Derek Low
Subject: FW: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Derek

As you would be aware the NSW RFS provides recommended conditions for SSD when they are referred to us by the approval authority, usually for being located on, or near bush fire prone land.

The NSW RFS does not have a compliance role under the legislation and is not a certifying authority.

Notwithstanding, the NSW RFS notes the role you have outlined above and supports the idea of ensuring SSD is subject to processes that can potentially improve their level of bushfire protection, including:

- (a) Determining what, if any of our recommended conditions provided to the approval authority were adopted into an approval document; and
- (b) Ensuring that any adopted conditions in the approval were appropriately complied with throughout the construction and subsequent occupation phases of the development.

As mentioned above it is not the role of the Planning and Environment Services (PES) to undertake or assist in compliance auditing.

The NSW RFS is the lead combat agency in NSW for bushfires and is also responsible for a number of other services that increase community resilience (including for schools). These include engaging with schools to improve their level of bush fire awareness (ie assist with preparing emergency and evacuation plans etc). During your audit process if any of the sites wish to contact the NSW RFS for assistance with regard to increasing their level of bushfire protection, I would refer you to the Southern Highlands District office Southern.Highlands@rfs.nsw.gov.au for further information.

If you have any further queries regarding the conditions of any approval that have originated from the NSW RFS , please contact myself.

Regards
Martha



Martha Dotter | A/Team Leader Development Assessment and Planning

Mon-Wed 4472 0613

Thur-Fri 4474 2855

Planning and Environment Services Batemans Bay

NSW RURAL FIRE SERVICE

Locked Bag 17 Granville NSW 2142

P 02 4472 0600 **F** 02 4472 0690 **E** Martha.Dotter@rfs.nsw.gov.au

www.rfs.nsw.gov.au | www.facebook.com/nswrfs | www.twitter.com/nswrfs

PREPARE. ACT. SURVIVE.

From: Martin Surrey <Martin.Surrey@rfs.nsw.gov.au>
Sent: Thursday, 13 June 2019 11:52 AM
To: Martha Dotter <Martha.Dotter@rfs.nsw.gov.au>
Cc: Naomi Gall <Naomi.Gall@rfs.nsw.gov.au>
Subject: FW: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Martha,

One for your Team.

Thanks

Superintendent Martin Surrey | District Manager | Southern Highlands Team
NSW RURAL FIRE SERVICE

From: Southern Highlands <Southern.Highlands@rfs.nsw.gov.au>
Sent: Thursday, 13 June 2019 11:47 AM
To: Martin Surrey <Martin.Surrey@rfs.nsw.gov.au>
Subject: FW: Independent Audit of Picton High School Redevelopment (SSD 8640)

From: Webmaster <webmaster@rfs.nsw.gov.au>
Sent: Thursday, 13 June 2019 7:36 AM
To: Southern Highlands <Southern.Highlands@rfs.nsw.gov.au>
Subject: FW: Independent Audit of Picton High School Redevelopment (SSD 8640)

Morning,

The enquiry below came through the public website – is this something you are able to follow up or should I direct it somewhere else?

Thanks

Naomi

Naomi Gall | Online Systems Officer | Organisational Communications
NSW RURAL FIRE SERVICE

From: Derek Low <dlow@wolfpeak.com.au>
Sent: Wednesday, 12 June 2019 10:12 PM
To: Webmaster <webmaster@rfs.nsw.gov.au>
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi there.

I am one of the DPE approved Independent Auditors on the Picton High School Redevelopment (SSD 8640).

I am currently preparing to undertake the independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 Sch2 Condition C41 and the Department of Planning and Environment's *Independent Audits Post Approval Requirements* (2018) (or IAPAR).

The consent is available at the following link:

http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8640

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf>

The audit is scheduled to occur on 19 June 2019 and pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the Department's IAPAR, I am consulting with the RFS on the scope of the audit. I understand the RFS provided advice during the assessment phase with regards to bushfire protection and response. These were considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Consent along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

In providing input to the scope, I kindly request RFS confirm if it any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. I look forward to hearing from you.

Derek Low
Principal Environmental Consultant



E: dlow@wolfpeak.com.au

P: 0402 403 716

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

www.wolfpeak.com.au



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Derek Low

From: UrbanGrowth <UrbanGrowth@sydneywater.com.au>
Sent: Wednesday, 19 June 2019 10:29 AM
To: Derek Low
Subject: RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Mr Low,

Thank you for your inquiry to Sydney Water.

Your inquiry has been received by the Growth Planning team and is being actioned by the appropriate officer.

We will assess your concerns and endeavour to provide a response to you as soon as possible.

Regards,

Growth Planning Team.

From: Derek Low <dlow@wolfpeak.com.au>
Sent: Wednesday, 12 June 2019 10:22 PM
To: UrbanGrowth <UrbanGrowth@sydneywater.com.au>
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)

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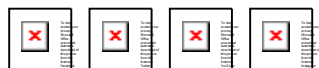
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Appendix E. Independent Audit Declaration Form(s)

Independent Audit Declaration Form

Independent Audit Declaration Form


Project name	Picton High School Redevelopment
Consent Number	SSD 8640
Description of Project	Redevelopment of Picton High School including demolition of buildings, excavation, refurbishment of existing buildings, construction of a new two and three storey building connecting to existing buildings, reconfiguration of car and bus drop/off pick up area and access and parking arrangements, boundary adjustments, removal of trees and associated landscaping works.
Project Address	480 Argyle Street, Picton 2571
Proponent	NSW Department of Education (Infrastructure Projects)
Title of Audit	Independent Audit
Date	02/07/2019

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

- the audit has been undertaken in accordance with relevant condition(s) of consent 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;
- 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;
 - I declared prior to the audit that I had been engaged to prepare the Independent Audit Program
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of auditor	Derek Low
Signature	
Qualification	Master of Environmental Engineering Management Exemplar Global Auditor Number 114283
Company	WolfPeak Pty Ltd
Company address	Suite 2, Level 10, 189 Kent Street Sydney NSW 2000

Independent Audit Declaration Form

Independent Audit Declaration Form

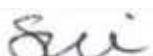
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- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit;
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Name of auditor	Steve Fermio
Signature	
Qualification	Bachelor of Science (Honours) Exemplar Global Auditor Number 110498
Company	WolfPeak Pty Ltd
Company address	Suite 2, Level 10, 189 Kent Street Sydney NSW 2000

Appendix F. Site inspection photographs.



Photo 1: Tree Protection Zone not set at required diameter and damaged.



Photo 2: Spill kits, stocked and readily available



Photo 3: Boundary misting system



Photo 4: Stabilised site access



Photo 5: HAZCHEM storage with internal bunding



Photo 6: Concrete washout



Photo 7: Noise barrier on temporary school boundary



Photo 8: Staff parking

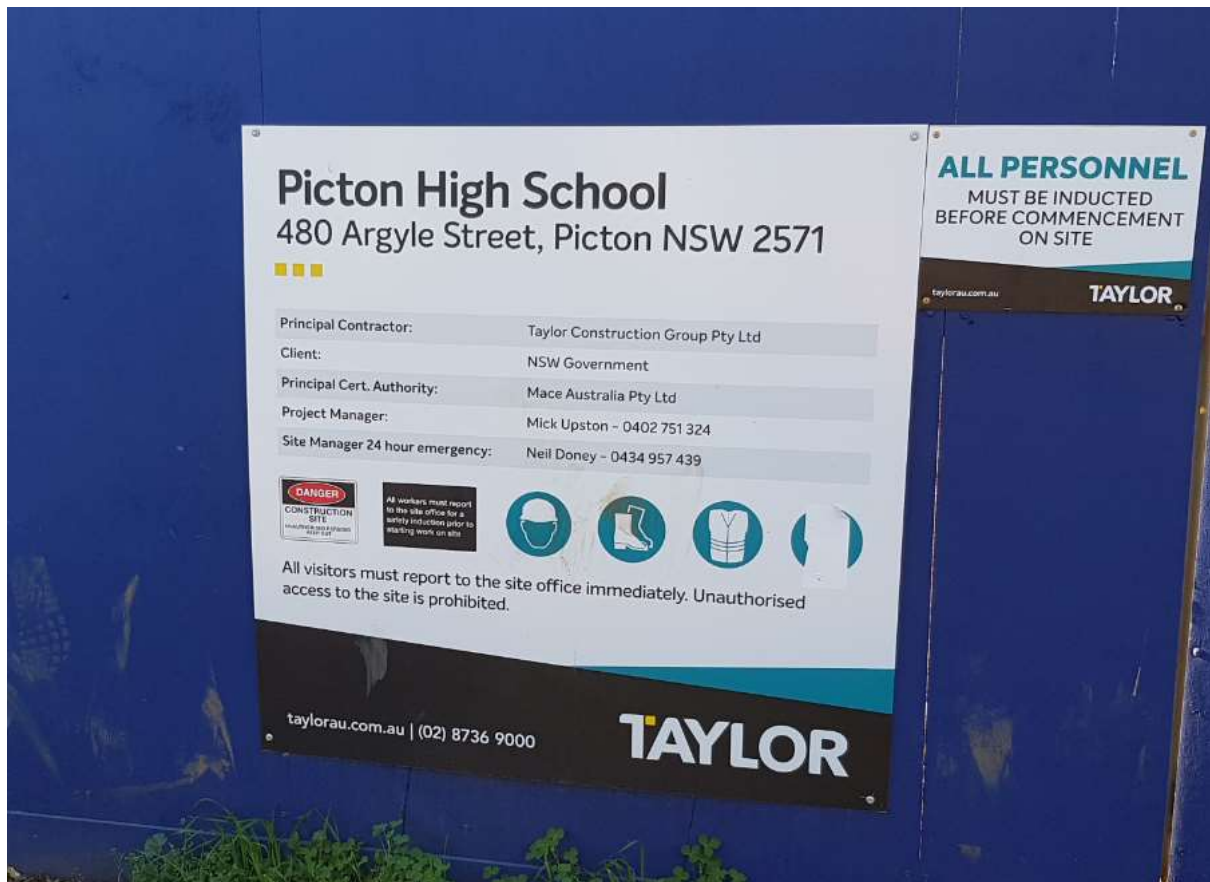


Photo 9: Site signage



WolfPeak Pty Limited

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17A High Street, Wauchope 2446

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