



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 1,580 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 second Independent Audit for the construction period, covering the period from 20 June 2019 to 25 November 2019. This represents the second Independent Audit on the Project.

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 during the audit period include completing demolition, remediation, early civil works, and construction of piles.

The overall outcome of the Independent Audit was indicative of a good degree of compliance and environmental performance by SINSW, Mace and Taylor. Records were organised and available at the time of the site inspection and interview with SINSW, Mace and Taylor personnel on 25 November 2019.

There were 112 CoCs assessed. Three new non-compliances were identified. One non-compliance from the previous audit remains unaddressed. Four non-compliances from the previous audit were addressed in a manner that did not fully address the non-compliance or the actions nominated by the Auditee at the previous Independent Audit.

Additionally, the Auditor reminds the Project that CoC C8 requires the implementation of the Construction Environmental Management Plan (CEMP) and sub-plans, prepared in accordance with consent. Implementation of the Taylor Project Environmental Management Plan does not preclude the need implement all aspects of the approved CEMP.

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 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.

On 28 June 2019, a modification to that development consent (SSD 8640 MOD 1) was approved, which provided for

- construction of two additional support unit classrooms as an extension to an existing special education building
- removal of seven trees
- amendments to an approved main (STE(a)M) building footprint and form
- additional automotive extension to existing metalworks building
- revised waste collection location
- installation of solar panels
- installation of signage
- reconfiguration of parking areas; and
- amendments to Green Star rating requirements.

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 during the audit period include completing demolition, remediation, early civil works, and the commencement of construction of piles.

## 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 20 June 2019 to 25 November 2019. Works undertaken during the audit period include completing demolition, remediation, early civil works, and construction of piles.

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

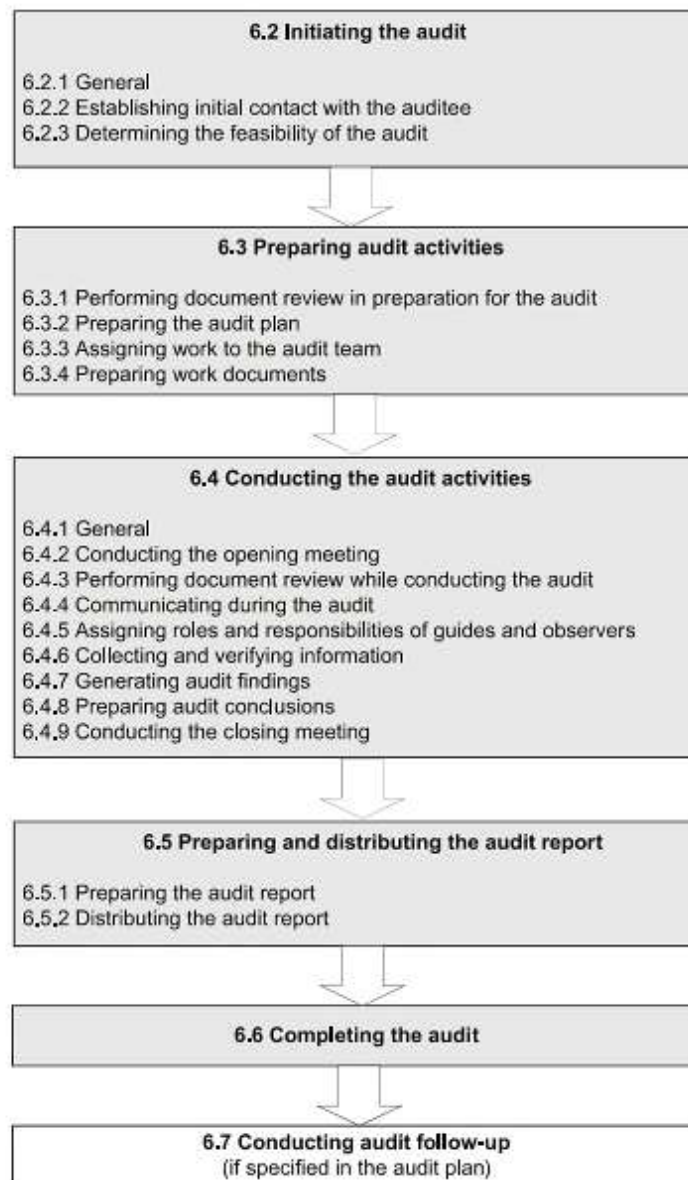


- incidents, non-compliances and complaints that occurred or were made during the audit period
- the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
- feedback received 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 5 November 2019 WolfPeak consulted with the Department, Wollondilly Shire Council, Transport for NSW, the Environment Protection Authority, Sydney Water, NSW Rural Fire Service, and Heritage NSW 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	The Department requests that all conditions of consent for SSD 8640 are assessed, and that the audit is conducted in accordance with the requirements of condition C41 of SSD 8640.  In addition to the above, the Department requested a focus on assessing compliance with CoCs A12a)-d), and C22.	Included in scope
Sydney Water	No response	-
Transport for NSW	No response	-
Rural Fire Service	No response	-
Heritage NSW	No comments to direct to the scope of the audit. They note the need to report unexpected finds of relics in accordance with the Heritage Act.	Included in scope.
Environment Protection Authority	No response	-
Wollondilly Shire Council	Concerns around parking, access, traffic, and pedestrian safety. In particular the use of Wonga Road by users of the temporary school.	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*, Ethos Urban, 30 October 2018, (the RtS)
- *PICTON HIGH SCHOOL RESPONSE TO SUBMISSIONS – RMS COMMENTS*, Ethos Urban, 12 December 2018 (the SRtS)
- *Picton High School Redevelopment, SSD-8640 Section 4.55(2) Modification Application*, Ethos Urban, 1 February 2019
- *Development Consent SSD 8640*, 20 December 2019 (the Consent)
- *Development Consent SSD 8640, Modification 1*, 28 June 2019 (SSD 8640 MOD 1)
- *Construction Environmental Management Plan Picton High School*, SMEC, 5 April 2019 (the CEMP)
- *Unexpected finds protocol*
- *Construction Traffic and Pedestrian Management Plan (Main Works)*, Stantec, V3, 18 November 2019 (the CTPMSP)
- *Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan*, Acoustic Logic, Rev 2, 6 November 2019 (the CNVMSP)
- *Construction Soil and Water Management Sub-Plan Picton High School Redevelopment*, Rev 2, SMEC, 27 July 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 2018 (the BfMP)
- *Waste Management Plan Picton High School Redevelopment*, Rev 3, SMEC, 17 January 2019 (the CWMSMP)
- *Addendum To Waste Management Plan - Picton High School Redevelopment*, SMEC, 17 January 2019
- *Community Communication Strategy Picton High School Redevelopment*, April 2019, Schools Infrastructure NSW (the CCS).

The audit checklist was reviewed and prepared, comprising all conditions from Schedule 2 of SSD 8640.

### **2.1.3 Site personnel involvement**

The on-site audit activities took place on 25 November 2019. The following personnel took part in the audit:

- Daniel Hogan – Senior Project Manager - Mace Group
- Mick Upston – Senior Project Manager – Taylor Construction
- Jacqueline Cuzon – Cadet – 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 25 November 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. The evidence sighted against each requirement is detailed within Appendices A and B.

#### 3.2 Compliance Status

This Section presents the findings of the November 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 Checklist provided in Appendix A presents details of all the evidence collected, observed and provided in support of a finding.

##### 3.2.1 Summary

There were 112 CoCs assessed. Three new non-compliances were identified at the November 2019 audit.

One non-compliance from the previous audit remains unaddressed. Four non-compliances from the previous audit were addressed in a manner that did not fully address the non-compliance or the actions nominated by the Auditee at the previous audit.

##### 3.2.2 Details

###### **Non-compliance against CoC A20**

CoC A20 requires that until the completion of all works under the consent, or such other time as agreed by the Planning Secretary, the Project must present various information publicly available on its website; including all approved strategies, plans and programs required under the CoCs. CoC A20 also requires that the information must be kept up to date.

The website did not present the current version of the CTPMSP, CNVMSP or CSWMSP. This has since been resolved.

###### **Non-compliance against CoC B37**

CoC B37 requires that Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).

Construction commenced on 10 May 2019, but Construction Compliance Report 1 had not been submitted within 6 months of commencing of construction (i.e. by 10 November 2019), contrary to the requirements of Compliance Reporting Post Approval Requirements (Department 2018).

### **Non-compliance against CoC C44**

CoC C44 requires that within three months of:

- (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.

The Pre-construction Compliance Report was submitted on 24 July 2019, triggering the requirement in CoC C44. Whilst evidence of a review was available, there was no evidence that the stakeholders were notified of that review as required by the condition.

### **Non-compliance against CoC B15 (carried over from June 2019 audit)**

CoC B15 requires that, prior to the commencement of construction, the Applicant prepare a Construction Environmental Management Plan (CEMP), and sets out details of what that plan must include.

In the June 2019 Audit Report, it was found that there had been non-compliance with this condition as the following, required, components were not included in the CEMP:

- the 24-hour contact details of the site manager
- a groundwater management plan
- details of outdoor lighting compliance with AS4282; and additionally
- the Waste Management Plan had been prepared but was not attached to the CEMP presented on the Picton High School website.

The Auditee nominated as an action that it would provide the required information, management plans and lighting compliance details to Independent Auditor, the Certifying Authority and the Department.

The Auditee has provided a response to these findings, however the response and updates provided by the Auditee relate to the Taylor Project Environmental Management Plan (**Taylor PEMP**) and not the CEMP prepared under this condition and presented on the website.

The Auditor does not have the authority to direct the Auditee to make the changes to the CEMP (this authority resides with the Department). With this in mind, the Auditor will not be assessing implementation of the action going forward.

### **Non-compliance against CoC B18 and CoC A11 (carried over from the June 2019 audit)**

CoC B18 b) requires that a CNVMSP be prepared and include procedures for achieving the noise management levels from the Interim Construction Noise Guideline (ICNG).



In the June 2019 Audit Report it was found that Section 5.1.2 of the CNVMSP 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 and these receivers exist adjacent or in proximity to the Project and are likely to be affected by construction noise. The temporary school has not been identified as a receiver in the report, or had the applicable NML applied to it.

The Auditee has provided a response in relation to this matter (in the form of correspondence from the Acoustic Consultant and an updated CNVMSP). The Auditor considers that the response in relation to NMLs does not address this issue as the CNVMSP has not been updated to capture this information. With that being said, the Auditee has demonstrated that an appropriate NML has been applied during construction monitoring rounds and mitigation implemented accordingly.

The Auditor does not have the authority to direct the Auditee to make the changes to the CNVMSP (this authority resides with the Department). With this in mind, the Auditor will not be assessing implementation of the action going forward. However, the Auditor will expect to see ongoing implementation of controls so as to attempt to meet the applicable NMLs going forward as required by CoC C14. That is, the Project should seek to achieve an impact of <45dB(A) internal to the temporary school.

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.

The Auditee has provided a response in relation to this matter (in the form of correspondence from the Acoustic Consultant and an updated CNVMSP). The Auditor does not consider the response to appropriately address this issue as the CNVMSP has not been updated to capture this information. The document remains non-compliant. With that being said, the Auditee has demonstrated that consultation on high impact noise has been occurring during the construction period.

The Auditor does not have the authority to direct the Auditee to make the changes to the CNVMSP (this authority resides with the Department). With this in mind, the Auditor will not be assessing implementation of the action going forward. Therefore the Auditor will expect to see ongoing consultation being implemented in future audits.

#### **Non-compliance against CoC B19 (carried over from June 2019 audit)**

CoC B19 sets out matters that the Construction Waste Management Sub-Plan (CWMS) must address, including:

- detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and
- 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.

In the June 2019 Audit Report, it was found that there had been non-compliance with this condition as, although the CWMS identifies the waste streams to be generated and the reuse, recycling and disposal options, it does not identify the quantities of each waste type as these are determined at a later date.

The Auditee provided a response to this matter in the form of the waste register. The Auditor does not consider the response to appropriately address this issue as the CWMS has not been updated to capture this information. However, the Auditee has demonstrated that it is actively tracking quantities of waste and the disposal destinations. The Auditor does not have the authority to direct the Auditee to make the changes to the CWMS (this authority resides with the Department). Therefore, the Auditor will not be seeking an update to the CWMS to address this issue, rather it will expect to see ongoing implementation of waste tracking as required by CoC C32 – C35 and the CWMS.

Also in the June 2019 Audit it was identified that the CWMS did not include the details for the removal of hazardous materials, as is required by CoC B19(b) (although these are detailed within separate documents). The Auditee provided a response to this matter, but the Auditor considers that the response does not address this issue as the CWMS has not been updated to capture this information. However, the Auditee has demonstrated that it is actively handling the removal of hazardous materials on site. The Auditor does not have the authority to direct the Auditee to make the changes to the CWMS (this authority resides with the Department). Therefore, the Auditor will not be seeking an update to the CWMS to address this issue, rather, it will expect to see ongoing implementation of hazardous materials management as required by CoC C35.

Further, the CWMS is not attached to the CEMP (required by CoC B15(e)). The Auditee has responded to this by appending the CWMS to the Taylor PEMP. However, the Taylor PEMP is not the CEMP prepared in accordance with CoC B15 (see the comments on the Taylor PEMP elsewhere in this Report).

#### **Non-compliance against CoC B20 and A11 (carried over from the June 2019 audit)**

CoC B20 requires that a CSWMS be prepared in consultation with Council (CoC C20b) and address the information prescribed by the condition including details of measures to manage stormwater under certain storm events (CoC B20 e). CoC A11 requires that evidence of consultation be included with the document to which it relates.

In the June 2019 Audit, it was found that there was non-compliance with these conditions as there was no evidence that the document was prepared in consultation with Council, and information that detailed measures to be implemented under the 1:100 year ARI storm events had not been included as specified by the condition.

The Auditee has provided a response to these issues, and has prepared an addendum to the CSWMS. The Auditee referred to consultation undertaken with Council during the assessment phase of the Project. The Auditor considers that the response in relation to consultation does not satisfy the requirement of CoC B20 or A11 as the CSWMS has not been updated to capture this

information. The Auditor notes that consultation undertaken during assessment of the Project does not address post approval consultation requirements. Despite these facts, the Auditee has shown that it is consulting with Council on the Project more broadly. The Auditor does not have the authority to direct the Auditee to make the changes to the CSWMSP (this authority resides with the Department). Therefore, the Auditor will not be assessing consultation with Council on the CSWMSP, rather it will be expecting to see proper implementation of soil and water controls on site as required by CoCs C26 and C28.

An updated CSWMSP was prepared on 26 July 2019 which addressed each of the flow events required by CoC B20e). The Auditor notes that the new version of the CSWMSP is not the version presented on the website.

### **Non-compliance against CoC B26 (carried over from the June 2019 audit)**

CoC B26 requires that, 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.

In the June 2019 Audit, it was found that there was non-compliance with this condition, as the relevant ecosystems credits were not retired prior to clearing or construction works, that the Project submitted the application to the Biodiversity Conservation Fund (**BCF**) on 6 May 2019, and that on 13 May 2019 the (then) Office of Environment and Heritage responded to advise that they required a statement of reasonable equivalence and resubmission (due to the implementation of the new offsetting process).

The statement of reasonable equivalence was completed in October 2019. The updated application was lodged to the BCF 21 November 2019. The credits have yet to be retired. This non-compliance has not yet been resolved.

### **3.2.3 Corrective action requests and observations**

There were three new observations identified at the November 2019 Audit. One observation had not been addressed since the previous audit. One observation is considered closed despite the nominated action not being completed.

#### **Observation in relation to CoC A7**

CoC B17 states that, 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, which is binding on the parties.

Whilst not a formal dispute, it is observed that Wollondilly Shire Council (**Council**) has raised parking and access issues on Wonga Road on several occasions. Council claims that users of the temporary school (e.g. parents, students, and staff) are parking illegally and using an access point that is not approved. They express concern that this misuse poses a safety risk to pedestrians in the area. Refer to the consultation records in Appendix C for details.

The Auditor notes that the temporary school was assessed and self-determined by the Department of Education under Part 5 of the EP&A Act and is therefore outside the scope of this audit.

The Auditor observes that the Auditees agree that users of the temporary school have been using Wonga Road for parking and access. The Auditees note that this issue will be alleviated through the construction of the round-about and turn out bays on Wonga Road (which do form part of the Project). These works have been delayed due to the presence of a previously unidentified sewer main under the proposed round-about. The Project is working closely with Sydney Water to enable these works to occur over January 2020.

Other than seek to expedite the Wonga Road works, and provide and communicate access to the users of the temporary school, the Auditees have limited capacity to prevent misuse from occurring. The Auditor recommends SINSW and the Department of Education (as the operator of the temporary school) better engage with users of the temporary school and Council to manage the issue in a productive manner.

#### **Observation in relation to CoC B15 and C8**

CoC B15 requires that, prior to the commencement of construction, the Applicant prepare a Construction Environmental Management Plan (CEMP), and sets out details of what that plan must include. CoC C8 requires that the works be carried out in accordance with the most recent version of the approved CEMP (including Sub-Plans).

As noted above, the June 2019 Audit found non-compliance with CoC B15 and the Auditee has responded by reference to a Taylor Project PEMP rather than the originally prepared CEMP (which remains on the Project Website).

The Auditor observes that if the Auditee follows the Taylor PEMP rather than the CEMP originally prepared, there is no guarantee the CoC will be adequately addressed as the Taylor PEMP was not prepared in accordance with the CoCs, was not consulted on with relevant stakeholders, or subject to detailed review by the Certifying Authority or the Auditor.

#### **Observation in relation to CoC B17 and C8**

CoC B17 requires that a CTPMSP be prepared and address the information prescribed by the condition. The CTPMSP forms part of the CEMP suite of documents. CoC C8 requires that the works be carried out in accordance with the most recent version of the approved CEMP (including Sub-Plans).

The Auditor observes that the CTPMSP identifies a proposed offsite area for construction workers to park. The area that was eventually secured by the Project is not the area designated in the CTPMSP. As such, the CTPMSP should be updated to properly identify the parking area approved for use (and being used) by workers on site at the Project.

#### **Observation in relation to CoC C18 (carried over from the June 2019 audit)**

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).

In the June 2019 Audit Report, it was observed that the Project indicated that vibration monitoring had occurred, yet there was no evidence to demonstrate that this was the case.

Two vibration monitoring reports were provided by the Auditee in response to the observation. It is observed that the Project vibration monitoring reports deal with structural damage criteria only and do not assess compliance with human comfort criteria as called up by CoC C18(b).

### **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.

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

The Auditor reiterates that if the Auditee follows the Taylor PEMP rather than the CEMP originally prepared in accordance with CoC B15, there is no guarantee the CoCs will be adequately complied with as the Taylor PEMP was not prepared in accordance with the CoCs, was not consulted on with relevant stakeholders, or subject to detailed review by the Certifying Authority or the Auditor.

### **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 Appendix A) and controls observed in the field.

### **3.5 Summary of notices from agencies**

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

### **3.6 Other matters considered relevant by the Auditor or DPIE**

#### **3.6.1 CoC C28 - Discharge of waters**

As noted in the previous audit, 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).

### 3.7 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\\_Nov\\_2019.pdf](https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/p/picton-high-school/Complaints_register_PictonHS_Nov_2019.pdf)

At the time of writing, a six complaints were recorded within the Audit Period. These related dust, noise, and asbestos management. All six 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 updated application was submitted on 21 November 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

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
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 hazardous materials are present or likely to be present and should be removed or further investigated.	Works to date have involved removal of asbestos and related materials from building fabrics and equipment above the surface. The works appear to be 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.	Y
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.	Y
Bushfire	The Project is subject to a low bushfire risk	The audited Project did not appear to be different to that assessed.	Y



#### 4. Actions

Item	Cond No	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status
<b>JUNE 2019 OPEN AUDIT FINDINGS</b>						
<b>Conditions of Consent SSD 8640 Schedule 2</b>						
1	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	<p>CLOSED</p> <p>Methods of communicating these to the workforce have been provided on 10/7/19.</p>
2	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"> <li>- 24-hour contact details of the site manager (CoC B15 a li)),</li> <li>- a groundwater management plan (CoC B15 a vi))</li> <li>- details of outdoor lighting compliance with AS4282 (CoC B15 a vii))</li> <li>- The CWMSP (CoC B15 d)).</li> </ul> <p>The Auditor notes:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- the need to detail external lighting compliance would be redundant if the Project does not install outdoor lighting.</li> <li>- The CWMSP has been prepared but it has not been attached to the CEMP.</li> </ul>	Provide the required information, managements plans and lighting compliance details to Independent Auditor, the Certifying Authority and the Department.	By SINSW Project Team by 31 July 2019	<p>CLOSED – WITH COMMENTS</p> <p>The Auditee has provided a response to these findings, however the response and updates provided by the Auditee relate to the Taylor Project Environmental Management Plan (Taylor PEMP) and not the CEMP prepared under this condition and presented on the website.</p> <p>The Auditor does not have the authority to direct the Auditee to make the changes to the CEMP (this authority resides with the Department). With this in mind, the Auditor will not be assessing implementation of the action going forward.</p>
3	CoC B18 (and CoC A11)	Non-compliance	<p>CoC B18 requires that a CNVMSP be prepared and address the information prescribed by the condition.</p> <p>CoC B18 b) requires the CNVMSP include a procedures for achieving the noise management levels from the Interim Construction Noise Guideline (ICNG).</p> <p>Section 5.1.2 of the CNVMSP 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 CNVMSP 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 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.</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>	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	<p>CLOSED – WITH COMMENTS</p> <p>The Auditee has provided a response in relation to these matters.</p> <p><b>CoC B18 b):</b> The Auditor notes that Table 8 includes a note demonstrating that noise penalties from the ICNG have been factored in as appropriate.</p> <p><b>CoC B18 b):</b> The Auditee has provided a response in relation to this matter (in the form of correspondence from the Acoustic Consultant and an updated CNVMSP). The Auditor considers that the response in relation to NMLs does not address this issue as the CNVMSP has not been updated to capture this information. With that being said, the Auditee has demonstrated that an appropriate NML has been applied during construction monitoring rounds and mitigation implemented accordingly.</p> <p>The Auditor does not have the authority to direct the Auditee to make the changes to the CNVMSP (this authority resides with the Department). With this in mind, the Auditor will not be assessing implementation of the action going forward. However, the Auditor will expect to see ongoing implementation of controls so as to attempt to meet the applicable NMLs going forward as required by CoC C14. That is, the Project should seek to achieve an impact of &lt;45dB(A) internal to the temporary school.</p>

						<p><b>CoC B18e) and f) (and CoC A11):</b> The Auditee has provided a response in relation to this matter (in the form of correspondence from the Acoustic Consultant and an updated CNVMSP). The Auditor does not consider the response to appropriately address this issue as the CNVMSP has not been updated to capture this information. The document remains non-compliant. With that being said, the Auditee has demonstrated that consultation on high impact noise has been occurring during the construction period.</p> <p>The Auditor does not have the authority to direct the Auditee to make the changes to the CNVMSP (this authority resides with the Department). With this in mind, the Auditor will not be assessing implementation of the action going forward. Therefore the Auditor will expect to see ongoing consultation being implemented in future audits.</p>
4	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	<p>CLOSED</p> <p>The Project has demonstrated through the document entitled 'Attended Construction Noise Monitoring During HSC' (Acoustic Logic 25/10/19) and the noise 'traffic light' reports that it is implementing the management approach.</p>
5	CoC B19	Non-compliance	<p>CoC B19 requires that a CWMS 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 CWMS 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 CWMS does not include the details for the removal of hazardous materials. These are detailed within separate documents.</p>	CWMS to be updated as specified and submit to Independent Auditor, the Certifying Authority and the Department.	By SINSW Project Team by 31 July 2019	<p>CLOSED – WITH COMMENTS</p> <p>The Auditee has provided a response to these matters.</p> <p><b>CoC B19 a):</b> The Auditee provided a response to this matter in the form of the waste register. The Auditor does not consider the response to appropriately address this issue as the CWMS has not been updated to capture this information. However, the Auditee has demonstrated that it is actively tracking quantities of waste and the disposal destinations. The Auditor does not have the authority to direct the Auditee to make the changes to the CWMS (this authority resides with the Department). Therefore, the Auditor will not be seeking an update to the CWMS to address this issue, rather it will expect to see ongoing implementation of waste tracking as required by CoC C32 – C35 and the CWMS.</p> <p><b>CoC B19 b):</b> The Auditee provided a response to this matter, but the Auditor considers that the response does not address this issue as the CWMS has not been updated to capture this information. However, the Auditee has demonstrated that it is actively handling the removal of hazardous materials on site. The Auditor does not have the authority to direct the Auditee to make the changes to the CWMS (this authority resides with the Department). Therefore, the Auditor will not be seeking an update to the CWMS to address this issue, rather, it will expect to see ongoing implementation of hazardous materials management as required by CoC C35.</p> <p>Further, the CWMS is not attached to the CEMP (required by CoC B15(e)). The Auditee has responded to this by appending the CWMS to the Taylor PEMP. However, the Taylor PEMP is not the CEMP prepared in accordance with CoC B15 (see the comments on the Taylor PEMP elsewhere in this Report).</p>

6	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	<p>CLOSED – WITH COMMENTS</p> <p>The Auditee has provided a response to these matters.</p> <p><b>CoC B20b) (and CoC A11):</b> The Auditee has provided a response to these issues, and has prepared an addendum to the CSWMSP. The Auditee referred to consultation undertaken with Council during the assessment phase of the Project. The Auditor considers that the response in relation to consultation does not satisfy the requirement of CoC B20 or A11 as the CSWMSP has not been updated to capture this information. The Auditor notes that consultation undertaken during assessment of the Project does not address post approval consultation requirements. Despite these facts, the Auditee has shown that it is consulting with Council on the Project more broadly. The Auditor does not have the authority to direct the Auditee to make the changes to the CSWMSP (this authority resides with the Department). Therefore, the Auditor will not be assessing consultation with Council on the CSWMSP, rather it will be expecting to see proper implementation of soil and water controls on site as required by CoCs C26 and C28.</p> <p><b>CoC B20 e):</b> An updated CSWMSP was prepared on 26 July 2019 which addressed each of the flow events required by CoC B20e). The Auditor notes that the new version of the CSWMSP is not the version presented on the website.</p>
7	CoC B20 (and CSWMS P 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	<p>CLOSED</p> <p>The CSWMSP has been updated.</p>
8	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	<p>CLOSED</p> <p>The Department approved the ACHMSP on 10/9/19.</p>
9	CoC B26	Non-compliance	<p>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).</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>	An Application for Assessment of a Reasonable 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.	By SINSW Project Team by 27 September 2019 pending responses by OEH	<p>OPEN</p> <p>The statement of reasonable equivalence was completed in October. The updated application was lodged to the BCF 21/11/19. The credits have yet to be retired. This non-compliance has not yet been resolved.</p>

10	CoC B36	Non-compliance	<p>CoC B36 requires that, 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.</p> <p>There was no evidence at the time of the audit that the incorporation of Councils requirements of the streetscape design and treatment had been demonstrated to the Certifying Authority.</p>	Evidence of submission and Certifying Authority satisfaction to be provided to Independent Auditor	By SINSW Project Team by 31 July 2019	<p>CLOSED</p> <p>Evidence of demonstration of compliance with Council requirements to the Certifying Authority provided.</p>
11	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 be managed. Refer response to CoC B18 regarding the adequacy of the guidance presented in Section 9 of the CNVMSP.</p>	Evidence of monitoring will be collated and kept on site	By SINSW on and ongoing basis.	<p>OPEN</p> <p>Two vibration monitoring reports were provided by the Auditee. The Project vibration monitoring reports deal with structural damage criteria only and do not assess compliance with human comfort criteria as called up by CoC C18 b).</p>
12	CoC C22	Non-compliance	<p>CoC C22 requires that all trees on the site must be suitably protected during construction; 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	<p>CLOSED</p> <p>Tree protection zones were observed in the field and arborist inspections were occurring.</p>
13	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	<p>CLOSED</p> <p>This issue has been resolved without the CEMP capturing this information.</p> <p>A VENM certificate has been obtained for the import of excavated material.</p>
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	<p>CLOSED</p> <p>Arborist inspections had occurred and tree protection zones were in place.</p>
15	CoC C32 (and CWMS 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 CWMS, 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>	Evidence of waste material classification and disposal to a facility lawfully permitted to receive it to be submitted to the Independent Auditor	By SINSW Project Team by 31 July 2019	<p>CLOSED</p> <p>All material is pre-classified under the Waste Classification Guidelines. Dump-it monthly waste reports identify waste types, volumes, amount recycled, receiving facilities. ACM was tracked and disposed of to a facility lawfully permitted to receive it. records were available during the audit.</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.			
16	CoC C35	Non-compliance	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.	Evidence of Asbestos Containing Material being disposed in accordance with POEO Waste Regulations to be submitted to the Independent Auditor	By SINSW Project Team by 31 July 2019	CLOSED  Refer above.
17	CCS Table 3: Advertising (print)	Non-compliance	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.	Evidence of advertising regarding community consultation to be submitted to the Independent Auditor	By SINSW Project Team by 31 July 2019	CLOSED  Newspaper advert 9/5/19 published in McArthur Chronicle.  Sighted next advert is schedule for the Wollondilly Advertiser December 2019.
18	CEMP Section 4.1	Non-compliance	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.	Evidence of inductions addressing the CEMP requirements to be submitted to the Independent Auditor	By SINSW Project Team by 31 July 2019	CLOSED  Project induction material was sighted.
19	CWMSP Section 7.1	Observation	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.  The register has not been updated following demolition and hazardous material removal.	Asbestos Register to be updated	By SINSW Project Team by 31 July 2019	CLOSED  Sighted hazardous materials register current to 11/10/19. No issues.
20	CWMSP G11	Non-compliance	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.	CWMSP to be updated and submitted to the Independent Auditor, Certifying Authority and the Department	By SINSW Project Team by 31 July 2019	CLOSED  Sighted project waste register.
21	ACHMSP Section 6	Non-compliance	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.	Evidence of fulfilment of commitments recommended in ACHMSP be submitted to Independent Auditor	By SINSW Project Team by 31 July 2019	CLOSED  Additional consultation has occurred since the drafting of the document. This is presented in Section 5.3 of the ACHMSP.  SE-F-20 contains details on heritage significance and responsibilities.
<b>DECEMBER 2019 AUDIT FINDINGS</b>						
<b>Conditions of Consent SSD 8640 Schedule 2</b>						
22	CoC A7	Observation	CoC A7 states that 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.  Whilst not a formal dispute, it is observed that Wollondilly Shire Council (Council) has raised parking and access issues on Wonga Road on several occasions. Council claims that users of the temporary school (e.g. parents, students, and staff) are parking illegally and using an access point that is not approved. They express concern that this misuse poses a safety risk to pedestrians in the area. Refer to the consultation records in Appendix C for details.	The Project will continue to engage with Council through the Section 138 approval process.  The Project notes that the Section 138 application for Wonga Road is submitted and approved. The Project hopes to complete these works in the coming months once Sydney Water	Wonga Road works to be completed by the Project Q2 2020.  Section 138 application for Argyle Street to be submitted by 28 February 2020	OPEN

			<p>The Auditor notes that the temporary school was assessed and self-determined by the Department of Education under Part 5 of the EP&amp;A Act and is therefore outside the scope of this audit.</p> <p>The Auditor observes that the Auditees agree that users of the temporary school have been using Wonga Road for parking and access. The Auditees note that this issue will be alleviated through the construction of the round-about and turn out bays on Wonga Road (which do form part of the Project). These works have been delayed due to the presence of a previously unidentified sewer main under the proposed round-about. The Project is working closely with Sydney Water to enable these works to occur over January 2020.</p> <p>Other than seek to expedite the Wonga Road works, and provide and communicate access to the users of the temporary school, the Auditees have limited capacity to prevent misuse from occurring. The Auditor recommends SINSW and the Department of Education (as the operator of the temporary school) better engage with users of the temporary school and Council to manage the issue in a productive manner.</p>	<p>Approval is granted following the discovery of an undocumented Sydney Water Asset.</p> <p>The Project has held preliminary meetings with Council regarding the Section 138 approval for Argyle Street and hope to submit its application for these works in February 2020.</p>		
23	CoC A20	Non-compliance	<p>CoC A20 states that 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> <ul style="list-style-type: none"> <li>a) make the following information and documents (as they are obtained or approved) publicly available on its website: <ul style="list-style-type: none"> <li>i. the documents referred to in condition A2 of this consent;</li> <li>ii. all current statutory approvals for the development;</li> <li>iii. all approved strategies, plans and programs required under the conditions of this consent;</li> <li>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;</li> <li>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;</li> <li>vi. a summary of the current stage and progress of the development;</li> <li>vii. contact details to enquire about the development or to make a complaint;</li> <li>viii. a complaints register, updated monthly;</li> <li>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;</li> <li>x. any other matter required by the Planning Secretary; and</li> </ul> </li> <li>b) keep such information up to date, to the satisfaction of the Planning Secretary.</li> </ul> <p>Non-compliance: The website does not present the current version of the CTPMSP, CNVMSP or CSWMSP.</p>	<p>Documents have now been uploaded to SINSW Picton High School Website. Project to ensure updated plans are uploaded to the Website.</p>	-	CLOSED
24	CoC B15 and CoC C8	Observation	<p>CoC B15 requires that, prior to the commencement of construction, the Applicant prepare a Construction Environmental Management Plan (CEMP), and sets out details of what that plan must include. CoC C8 requires that the works be carried out in accordance with the most recent version of the approved CEMP (including Sub-Plans).</p> <p>As noted above, the June 2019 Audit found non-compliance with CoC B15 and the Auditee has responded by reference to a Taylor Project PEMP rather than the originally prepared CEMP (which remains on the Project Website).</p> <p>The Auditor observes that if the Auditee follows the Taylor PEMP rather than the CEMP originally prepared, there is no guarantee the CoC will be adequately addressed as the Taylor PEMP was not prepared in accordance with the CoCs, was not consulted on with relevant stakeholders, or subject to detailed review by the Certifying Authority or the Auditor.</p>	<p>Project are to update CEMP and PEMP to ensure they are closely aligned with clear hierarchy throughout. Any plans which are updated will be reviewed and approved in accordance with the Consent Conditions.</p>	<p>Taylor/ SINSW</p> <p>By 28 February 2020</p>	OPEN
25	CoC B17 (and CoC C8)	Observation	<p>CoC B17 requires that a CTPMSP be prepared and address the information prescribed by the condition. The CTPMSP forms part of the CEMP suite of documents. CoC C8 requires that the works</p>	<p>CTPMSP to be updated to show actual location of contractors car park. Plan will be reviewed and</p>	<p>Taylor/ SINSW</p>	OPEN

			<p>be carried out in accordance with the most recent version of the approved CEMP (including Sub-Plans).</p> <p>The Auditor observes that the CTPMSP identifies a proposed offsite area for construction workers to park. The area that was eventually secured by the Project is not the area designated in the CTPMSP. As such, the CTPMSP should be updated to properly identify the parking area approved for use (and being used) by workers on site at the Project.</p>	submitted in accordance with the Consent Conditions.	By 28 February 2020	
26	CoC B37	Non-compliance	<p>CoC B37 requires that Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).</p> <p>The Construction Compliance Report 1 (prepared 17/10/19) had not been submitted within 6 months of commencing of construction (i.e.: 6 months from 10/5/19, being 10/11/19).</p>	<p>Project has now submitted the compliance report to the secretary.</p> <p>Project to ensure Compliance reports are not only produced within the allocated time but also submitted to the certifier and planning secretary.</p>	-	CLOSED
27	CoC C44	Non-compliance	<p>CoC C44 requires that Within three months of:</p> <p>(a) the submission of a compliance report under condition B37;</p> <p>(b) the submission of an incident report under condition C36;</p> <p>(c) the submission of an Independent Audit under condition C40;</p> <p>(d) the issue of a direction of the Planning Secretary under condition A2 which requires a review,</p> <p>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.</p> <p>Non-compliance: Evidence provided indicates that a review was carried out in July 2019, however there is no evidence to show that a review was conducted, or that the stakeholders were notified of that review.</p>	<p>Project conducts fortnightly Statutory Compliance meetings reviewing the projects compliance against all triggered conditions.</p> <p>Project to ensure that any of the triggers noted within the consent condition result in the project formally advising the planning secretary and project certifier of any resultant observations and actions.</p>	<p>Taylor/ SINSW</p> <p>Ongoing</p>	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 25 November 2019 and in the weeks following the site inspection.

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 112 CoCs assessed. Three new non-compliances were identified at the November 2019 audit. One non-compliance from the previous audit remains unaddressed. Four non-compliances from the previous audit were addressed in a manner that did not fully address the non-compliance or the actions nominated by the Auditee at the previous audit.

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 reminds the Project that CoC C8 requires the implementation of the CEMP and sub-plans, prepared in accordance with consent. Implementation of the Taylor PEMP does not preclude the need implement all aspects of the approved CEMP.

The Auditor would like to thank the Auditees for their organisation, cooperation and assistance during the IA.



## 6. Limitations

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To the best of WolfPeak's knowledge, the facts and matters described in this Document reasonably represent the Client's intentions at the time of which WolfPeak issued the Document to the Client. However, the passage of time, the manifestation of latent conditions or the impact of future events (including a change in applicable law) may have resulted in a variation of the Document and its possible impact. WolfPeak will not be liable to update or revise the Document to take into account any events or emergent circumstances or facts occurring or becoming apparent after the date of issue of the Document.

## Appendix A. SSD 8640 Conditions of Consent (including Mod 1)

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	The development may only be carried out: <ul style="list-style-type: none"> <li>a) in compliance with the conditions of this consent;</li> <li>b) in accordance with all written directions of the Planning Secretary;</li> <li>c) generally, in accordance with the EIS Response to Submissions <b>and Section 4.55 Modification Application</b>;</li> <li>e) in accordance with the approved plans in the table below:</li> </ul>	Approved Plans stamped plans observed 19/6/19 on site.  Documents as referred to as evidence elsewhere in this Audit Table	Compliance Is verified in part through this independent audit process  No directions were received from the Secretary.	Compliant

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C007	#1	Sediment and Erosion Control Details	09/03/2018																																																																																																																																	
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C008	AB	Soil and Water Management Consultations	20/11/2018																																																																																																																																	

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. This audit assesses compliance against the conditions of consent.	Compliant
<b>Limits of Consent</b>				
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
<b>Prescribed Conditions</b>				
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 CC2 P217_007-3, 15/7/19 Site signage	Part 6, Division 8A of the EPAA relates to prescribed conditions for: - compliance with the BCA (CC1 P217_007-2, 16/4/19, CC2 P217_007-3, 15/7/19) - erection of signs (sighted) - 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 adjoining to the Project).	Compliant
<b>Planning Secretary as Moderator</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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 <b>Observation: Council has raised parking and access issues on several occasion. It claims that users of the temporary school are parking illegally and using an access point that is not approved. The Auditor notes that the temporary school was assessed and self determined by the Department of Education under Part 5 of the EP&amp;A Act and is outside the scope of this audit. Although this issue is outside the scope of this Audit, the Auditor Observes that SINSW should actively engage with Council to manage the issue. Refer to section 2.1.1 and 3.6.3 of the IA Report.</b>	Not triggered
<b>Long Service Levy</b>				
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
<b>Legal Notices</b>				
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
<b>Student Numbers</b>				
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
<b>Evidence of Consultation</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A11	Where conditions of this consent require consultation with an identified party, the Applicant must: <ol style="list-style-type: none"> <li>a) consult with the relevant party prior to submitting the subject document for information or approval; and</li> <li>b) provide details of the consultation undertaken including:               <ol style="list-style-type: none"> <li>i. the outcome of that consultation, matters resolved and unresolved; and</li> <li>ii. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</li> </ol> </li> </ol>	Refer response to CoC B18 and B20	<b>Non-compliance identified at previous audit: there was no evidence provided at the time of the audit to demonstrate that the NVMSMP and CSWSMSP had been consulted on with the identified stakeholders. Whilst unresolved, the Auditor will not be pursuing action with regard to this requirement. Refer CoC B18 and B20.</b>	<b>Non-compliance</b>
<b>Staging, Combining and Updating Strategies, Plans or Programs</b>				
A12	With the approval of the Planning Secretary, the Applicant may: <ol style="list-style-type: none"> <li>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);</li> <li>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</li> <li>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).</li> </ol>	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
A12A	The project may be constructed and operated in stages. Where staged construction or operation is proposed, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted for the approval of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation)	As above	The Project is implementing approved stages as per CoC A12. Further staging has yet to be proposed	Compliant
A12B	A Staging Report prepared in accordance with condition A12 must: <ol style="list-style-type: none"> <li>(a) if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish;</li> <li>(b) if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant);</li> <li>(c) specify how compliance with conditions will be achieved across and between each of the stages of the project; and</li> <li>(d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.</li> </ol>	As above.	The Project is implementing approved stages as per CoC A12. Further staging has yet to be proposed	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A12C	Where staging is proposed, the project must be staged in accordance with the Staging Report, as approved to the Planning Secretary.	As above.	The Project is implementing approved stages as per CoC A12. Further staging has yet to be proposed	Compliant
A12D	Where staging is proposed, the terms of this approval that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	As above.	The Project is implementing approved stages as per CoC A12. Further staging has yet to be proposed	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 all construction stages the works being undertaken.	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 all construction stages the works being undertaken.	Not triggered.
<b>Demolition</b>				
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
<b>Structural Adequacy</b>				
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"> <li>Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</li> <li>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</li> </ul>	Interview with Auditees CC2 P217_007-3, 15/7/19	There have been no new buildings and structures, nor any alterations or additions to existing buildings and structures constructed during the audit period. The CA has verified that design meets the requirements of the BCA.	Compliant
<b>External Walls and Cladding</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
A17	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA	Interview with Auditees Architectural Design Statement 08/05/19 CC2 P217_007-3, 15/7/19	The architect and CA has verified that design meets the requirements of the BCA.	Compliant
<b>Design and Construction for Bush Fire</b>				
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 Architectural Design Statement 08/05/19 CC2 P217_007-3, 15/7/19	The architect and CA has verified that design meets the requirements of the BCA.	Compliant
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> .	- Northrop electrical design statement CC2 P217_007-3, 15/7/19	The electrical engineer and CA has verified that design meets the requirements of the BCA.	Compliant
<b>Applicability of Guidelines</b>				
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
<b>Monitoring and Environmental Audits</b>				
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&amp;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, and second report dated 25/10/19  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 reports presents the information in accordance with these requirements. This Audit has been carried out with regard to these requirements.	Compliant
<b>Access to Information</b>				

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>c) (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"> <li>xi. the documents referred to in condition A2 of this consent;</li> <li>xii. all current statutory approvals for the development;</li> <li>xiii. all approved strategies, plans and programs required under the conditions of this consent;</li> <li>xiv. 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;</li> <li>xv. 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;</li> <li>xvi. a summary of the current stage and progress of the development;</li> <li>xvii. contact details to enquire about the development or to make a complaint;</li> <li>xviii. a complaints register, updated monthly;</li> <li>xix. 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;</li> <li>xx. any other matter required by the Planning Secretary; and</li> </ul> <p>d) keep such information up to date, to the satisfaction of the Planning Secretary.</p>	<p><a href="https://www.schoolinfrastructure.nsw.gov.au/projects/p/picton-high-school.html">https://www.schoolinfrastructure.nsw.gov.au/projects/p/picton-high-school.html</a></p>	<p>Non-compliance from previous audit: 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. The website has since been updated.</p> <p><b>Non-compliance: The website does not present the current version of the CTPMSP, CNVMSP or CSWMSP</b></p>	Non-compliant
<b>Compliance</b>				
A23	<p>The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development</p>	<p>TBT 05/03/19 – 13/06/19 Demolition SWMS SE-F-11 Induction form and agenda. SE-F-20 additional induction items</p>	<p>Toolbox talks are being carried out regularly which communicate risk and controls and relevant requirements of the consent. Non-compliance from previous audit: 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. This has now been resolved.</p>	Compliant
<b>ADVISORY NOTES</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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
<b>PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION</b>				
<b>Notification of Commencement</b>				
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
<b>Certified Drawings</b>				
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: 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 Structural certificate 5/4/19 CC2 P217_007-3, 15/7/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The structural engineer and CA have verified this as compliant.	Compliant
<b>External Walls and Cladding</b>				
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 Design statement 8/5/19 CC2 P217_007-3, 15/7/19 Submission to DPIE 11/6/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.  The architect and CA have verified this as compliant and the information was sent to DPIE.	Compliant
<b>Landscaping</b>				
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 Updated landscape plan CC2 P217_007-3, 15/7/19 Submission to DPIE 7/6/19.	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The architect and CA have verified this as compliant. The information was provided to DPIE.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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 Updated landscape plan CC2 P217_007-3, 15/7/19 Submission to DPIE 7/6/19.	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The architect and CA have verified this as compliant. The information was provided to DPIE.	Compliant
<b>Protection of Public Infrastructure</b>				
B6	Before the commencement of construction, the Applicant must: <ul style="list-style-type: none"> <li>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;</li> <li>b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and</li> <li>c) submit a copy of the dilapidation report to the Certifying Authority and Council.</li> </ul>	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
<b>Unexpected Contamination Procedure</b>				
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
<b>Utilities and Services</b>				
B8	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Interview with Auditees Sec73 permit for OSD TIR669118.	Sydney Water is the only service on the SSD requiring approval for works. No external services affected.	Compliant
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 Site inspection	No above ground utility or service works have occurred during the audit period.	Not triggered.
<b>Community Communication Strategy</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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"> <li>a) identify people to be consulted during the design and construction phases;</li> <li>b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development;</li> <li>c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development;</li> <li>d) set out procedures and mechanisms:               <ol style="list-style-type: none"> <li>i. through which the community can discuss or provide feedback to the Applicant;</li> <li>ii. through which the Applicant will respond to enquiries or feedback from the community; and</li> <li>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.</li> </ol> </li> </ol> <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>	<p>The Strategy has been prepared in accordance with the condition and approved by DPE.</p>	Compliant
<b>Ecologically Sustainable Development</b>				
B11	<p>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 5) Ref 167053- ESD01 prepared by Northrop Consulting Engineers dated 13.03.2019 to achieve a minimum 4 Star Green Star rating.</p>	<p>DPE approval of staging report 7/5/19.</p> <p>Staging report 18/4/19</p> <p>CC2 P217_007-3, 15/7/19</p> <p>Correspondence from CA 4/6/19</p> <p>Architect design statement 30/5/19.</p> <p>Modification 1</p>	<p>The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The architect, CA confirm this is compliant following approval of Modification 1.</p>	Compliant
<b>Outdoor Lighting</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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. Northrop design statement 10/5/19. CC2 P217_007-3, 15/7/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The electrical engineer and CA have verified this as being compliant	Compliant
<b>Access for People with Disabilities</b>				
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 Design compliance statement 5/4/19 CC2 P217_007-3, 15/7/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The architect and the CA have verified this as compliant	Compliant
<b>Environmental Management Plan Requirements</b>				

<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"> <li>a. detailed baseline data;</li> <li>b. details of: <ul style="list-style-type: none"> <li>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>(ii) any relevant limits or performance measures and criteria; and</li> <li>(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;</li> </ul> </li> <li>c. a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</li> <li>d. a program to monitor and report on the: <ul style="list-style-type: none"> <li>(i) impacts and environmental performance of the development;</li> <li>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</li> </ul> </li> <li>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;</li> <li>f. a program to investigate and implement ways to improve the environmental performance of the development over time;</li> <li>g. a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</li> <li>(iii) complaint;</li> <li>(iv) failure to comply with statutory requirements; and</li> <li>i. a protocol for periodic review of the plan.</li> </ul> </li> </ul> <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, and V2 06/11/19 (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 Redevelopment, Peterson Bushfire, 16/5/18. (BfMP)</p> <p>Waste Management Plan Picton High School</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
		Redevelopment, SMEC, 27/2/19 (CWMSP)		
Construction Environmental Management Plan				



B15	<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> <ul style="list-style-type: none"> <li>a) Details of: <ul style="list-style-type: none"> <li>i. hours of work;</li> <li>ii. 24-hour contact details of site manager;</li> <li>iii. management of dust and odour to protect the amenity of the neighbourhood;</li> <li>iv. stormwater control and discharge;</li> <li>v. measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;</li> <li>vi. groundwater management plan including measures to prevent groundwater contamination;</li> <li>vii. external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting;</li> <li>viii. community consultation and complaints handling;</li> </ul> </li> <li>b) Construction Traffic and Pedestrian Management Sub-Plan (see condition B17);</li> <li>c) Construction Noise and Vibration Management Sub-Plan (see condition B18);</li> <li>d) Construction Waste Management Sub-Plan (see condition B19);</li> <li>e) Construction Soil and Water Management Sub-Plan (see condition B20);</li> <li>f) Aboriginal Cultural Heritage Management Sub-Plan (see condition B21);</li> <li>g) an unexpected finds protocol for contamination and associated communications procedure;</li> <li>h) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and</li> <li>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</li> </ul>	<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, and V3 18/11/19 (CTPMSP)</p> <p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (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 Redevelopment, Peterson Bushfire, 16/5/18. (BfMP)</p> <p>Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSPP)</p>	<p>The CEMP includes the prescribed information other than that outlined below.</p> <p><b>Non-compliance from previous audit:</b></p> <p><b>The 24-hour contact details of the site manager are not included.</b></p> <p><b>A groundwater management plan is not included.</b></p> <p><b>Details of outdoor lighting compliance with AS4282 is not included.</b></p> <p><b>The Waste Management Plan has been prepared but is not attached to the CEMP presented on the Picton High School website.</b></p> <p><b>The Auditee has provided a response to these findings. The Auditor notes that the updates and responses relate to the Taylor Project Environmental Management Plan and not the CEMP prepared under this condition and presented on the website. This non-compliance has not been resolved.</b></p> <p><b>Observation: The Auditor observes that if the Auditee follows the Taylor CEMP rather than the CEMP originally prepared, there is no guarantee the CoCs will be adequately addressed as the CEMP will not have been prepared in accordance with those CoCs or in consultation with relevant stakeholders.</b></p> <p>Observations from previous audit:</p> <p>The Auditor notes that the measures outlined in the CEMP and CSWMSP would prevent groundwater contamination.</p>	Non-compliant
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
			<p>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.</p> <p>The need to detail external lighting compliance need only be included if the Project proposes to install outdoor lighting.</p> <p>The Auditor considers these observations to be closed.</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

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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"> <li>a) be prepared by a suitably qualified and experienced person(s);</li> <li>b) be prepared in consultation with Council and RMS;</li> <li>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;</li> <li>d) detail heavy vehicle routes, access and parking arrangements;</li> <li>e) include a Driver Code of Conduct to:               <ul style="list-style-type: none"> <li>i. minimise the impacts of earthworks and construction on the local and regional road network;</li> <li>ii. minimise conflicts with other road users;</li> <li>iii. minimise road traffic noise; and</li> <li>iv. ensure truck drivers use specified routes;</li> </ul> </li> <li>f) a program to monitor the effectiveness of these measures; and</li> <li>g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.</li> </ul>	<p>Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19, and V3 18/11/19 (CTPMSP)</p>	<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 from previous audit: 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. This matter is closed.</p> <p>Observation from previous audit: Requirement g) Details on community consultation are included in the CCS. The Auditor considers this to be appropriate. This matter is closed.</p> <p><b>Observation: The CTPMSP identifies an offsite area for construction workers to park in. The area being used is not the area designated in the CTPMSP. The CTPMSP should be updated to properly identify the parking area approved for use (and being used) by workers on site at the Project.</b></p>	Compliant

B18	<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"> <li>a) be prepared by a suitably qualified and experienced noise expert;</li> <li>b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);</li> <li>c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</li> <li>d) include strategies that have been developed with the community for managing high noise generating works;</li> <li>e) describe the community consultation undertaken to develop the strategies in condition B23(d); and</li> <li>f) include a complaints management system that would be implemented for the duration of the construction.</li> </ul>	<p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP) Acoustic Logic response to audit findings 12/07/19</p>	<p>The CNVMSP adequately addresses requirements a), c), d) and f).</p> <p><b>Non-compliance from previous audit:</b> <b>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. The Auditee has provided a response. The Auditor does not consider the response to appropriately address this issue as the CNVMSP has not been updated to capture this information. The document remains non-compliant. With that being said, the Auditee has demonstrated that consultation on high impact noise has been occurring during the construction period. Therefore the Auditor will not be seeking an update to the CNVMSP to address this issue, rather it will expect to see ongoing consultation being implemented in future audits. Observation from previous audit:</b> <b>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.</b></p>	<p>Non-compliant</p>
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			<p><b>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. The Auditee has provided a response to this matter. The Auditor considers that the response does not address this issue as the CNVMSP has not been updated to capture this information. With that being said, the Auditee has demonstrated that an appropriate NML has been applied during construction monitoring rounds and mitigation implemented accordingly. Therefore the Auditor will not be seeking an update to the CNVMSP to address this issue, rather it will expect to see ongoing implementation of controls so as to attempt to meet the applicable NMLs going forward. That is, the Project should seek to achieve an impact of &lt;45dB(A) internal to the school.</b></p> <p>Observation from previous audit: 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 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</p>	
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
			<p>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. This has now been resolved.</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 provide the construction team with greater guidance on when monitoring should be undertaken and how it should be undertaken (AS1055). A second round of monitoring has been conducted. This appears to have occurred in accordance with AS1055. This observation is now closed.</p> <p>Observation: The CNVMSP does not detail whether the noise penalties specified in the ICNG have been applied to the NMLs for potentially annoying noise characteristics. This is captured within the CNVMSP as a note. This observation is closed.</p>	

B19	<p>The Construction Waste Management Sub-Plan (CWMS) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>(a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations;</li> <li>(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.</li> </ul>	<p>Waste Management Plan          Picton High School          Redevelopment, SMEC,          27/2/19 (CWMS)          Project waste register          ACM Blacktown Waste          EPL11497, dial a dump EPL          13426, Wallan truck          dockets and waste tracking          forms 1/6/19, Genesis          Eastern Creek tip dockets          1/6/19.</p>	<p><b>Non-compliance from previous audit:</b>  <b>The CWMS 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 Auditee has provided a response to this matter. The Auditor considers that the response does not address this issue as the CWMS has not been updated to capture this information. However the Auditee has demonstrated that it is actively tracking quantities of waste and the disposal destinations. Therefore the Auditor will not be seeking an update to the CWMS to address this issue, rather it will expect to see ongoing implementation of waste tracking. The CWMS does not include the details for the removal of hazardous materials. These are detailed within separate documents. The Auditee has provided a response to this matter. The Auditor considers that the response does not address this issue as the CWMS has not been updated to capture this information. However the Auditee has demonstrated that it is actively handling the removal of hazardous materials on site. Therefore the Auditor will not be seeking an update to the CWMS to address this issue, rather it will expect to see ongoing implementation of hazardous materials management.</b></p>	<p>Non-compliant</p>
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
			<p>The CWMSMP is not attached to the CEMP. The Auditee has provided a response to this matter by appending the CWMSMP to the Taylor PEMP. The Taylor PEMP is not the CEMP prepared in accordance with CoC B15.</p>	



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"> <li>(a) be prepared by a suitably qualified expert, in consultation with Council;</li> <li>(b) describe all erosion and sediment controls to be implemented during construction;</li> <li>(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);</li> <li>(d) detail all off-Site flows from the Site; and</li> <li>(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)</li> </ul>	<p>Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP)</p>	<p>The CSWMSP adequately addresses part of requirements a), and addresses requirements b), c).</p> <p><b>Non-compliance from previous audit: 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. The Auditee has provided a response to these issues, and has prepared an addendum to the CSWMSP.</b></p> <p>The Auditor considers that the response in relation to consultation does not satisfy the requirement of this condition as the CSWMSP has not been updated to capture this information. However the Auditee has shown that it is consulting with Council on the Project more broadly. Therefore the Auditor will not be seeking at update to the CSWMSP, rather it will be expecting to see proper implementation of soil and water controls on site. A CSWMSP was submitted to the Department on 22/11/19 which addresses each of the flow events required by CoC B20. The Auditor notes that the new version of the CSWMSP is different to the CSWMSP prepared under CoC B20, that forms part of the CEMP approved by the Certifying Authority and submitted to the Department under CoC B16 (and presented on the project website).</p>	<p>Non-compliant</p>
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Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
			<p><b>Observation from previous audit:</b>            Section 5.6 of the CSWMSP that deals with discharging of waters does not align with the requirement of CoC C28. This has not been resolved. The Auditor notes that the Project has not discharged water to date. The Auditor will not be seeking an update to the CSWMSP to address this issue. Rather the Auditor will be assessing compliance with CoC C28 going forward.</p>	
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"> <li>(a) be prepared by a suitably qualified and experienced expert in consultation with the Registered Aboriginal Parties; and</li> <li>(b) be submitted to the satisfaction of the Planning Secretary prior to construction of any part of the development.</li> </ul>	<p>Aboriginal Cultural Heritage Management Sub Plan Lot 2 DP 520158 Picton High School Redevelopment, AMAC and Streat Archaeological, V3, March 2019. (ACHMSP)            CC2 P217_007-3, 15/7/19</p>	<p>Non-compliance from previous audit: 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. The CA has now verified this as being compliant, sighting correspondence from SINSW.</p>	Compliant
<b>Construction Parking</b>				
B22	<p>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.</p>	<p>Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19, and V3 18/11/19 (CTPMSP)            Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSPP)            Site inspection 25/11/19</p>	<p>The project contains sufficient space for HV parking and movements internal to the site.</p>	Compliant
<b>Road Design and Traffic Facilities</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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 25/11/19 Site inspection 25/11/19 S138 201.2019.00000024.001	The Project obtained the necessary road works permits from Council for works on Wonga Road prior to their commencement.	Compliant
<b>Stormwater Management System</b>				
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"> <li>(a) be designed by a suitably qualified and experienced person(s);</li> <li>(b) be generally in accordance with the conceptual design in the EIS;</li> <li>(c) be in accordance with applicable Australian Standards;</li> <li>(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;</li> </ul>	DPE approval of staging report 7/5/19. Staging report 18/4/19 Design statement 29/3/19 CC2 P217_007-3, 15/7/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The civil engineer and CA have verified this as compliant	Compliant
<b>Operational Noise- Design of Mechanical Plant and Equipment</b>				
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 and Section 4.55 Acoustic Assessment report prepared by GHD dated January 2019, 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 and Section 4.55 Acoustic Assessment report prepared by GHD dated January 2019.	DPE approval of staging report 7/5/19. Staging report 18/4/19 Architectural design statement 5/4/19 CC2 P217_007-3, 15/7/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The architect and CA have verified this as being compliant	Compliant
<b>Biodiversity</b>				

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 OEHS Framework for Biodiversity Assessment (FBA) and the Biobanking Assessment Methodology 2014 (BBAM).</p> <p><b>Note:</b> 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 OEHS NSW Biodiversity Offsets Policy for Major Projects 2014</p>	<p>Interview with Auditees 25/11/19 Ecosystem credit application 06/05/19 Statement of reasonable equivalence DOC19/825383-2 Ecosystem credit application 21/11/19.</p>	<p><b>Non-compliance from previous audit:</b> 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 OEHS responded to advise that they required a statement of reasonable equivalence and resubmission (due to the implementation of the new OEHS offsetting process). The statement of reasonable equivalence was completed in October. The updated application was lodged to the BCF 21/11/19. The credits have yet to be retired. This non-compliance has not yet been resolved.</p>	Non-compliant
<b>Construction and Demolition Waste Management</b>				
B27	<p>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.</p>	<p>Correspondence to RMS 20/03/19 and from RMS to TMC 25/03/19</p>	<p>Notification occurred prior to commencement of works.</p>	Compliant
<b>Operational Waste Storage and Processing</b>				
B28	<p>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>	<p>DPE approval of staging report 7/5/19. Staging report 18/4/19 Correspondence from Council on operational waste management plan 22/3/19</p>	<p>The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. Council provided satisfaction of operational waste storage area.</p>	Compliant
<b>Mechanical Ventilation</b>				
B29	<p>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>	<p>DPE approval of staging report 7/5/19. Staging report 18/4/19 Mechanical services design statement 3/4/19 CC2 P217_007-3, 15/7/19</p>	<p>The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The mechanical engineer and CA have verified this as being compliant</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
<b>Rainwater Harvesting</b>				
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 Hydraulic Services Statement of Compliance 3/4/19 CC2 P217_007-3, 15/7/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The hydraulic engineer and CA have verified this as being compliant	Compliant
<b>Roadworks and Access</b>				
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 Statement from bushfire consultant 18/1/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The Project bushfire specialist have verified that this is compliant	Compliant
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 DPIE letter of approval of plans for Argyle Street and Wonga Road, 23/8/19 Swept Path analysis 29/3/19 Leap frog analysis 5/4/19 Sign post plan, May 2019 Wonga Road Sign Post, Oct 2018.	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The plans with accompanying information were submitted to DPIE for approval. They were approved on 23/8/19.	Compliant
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 Road Safety Evaluation Report, TTP, 5/6/19. Submission to DPIE 5/7/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The evaluation was undertaken and submitted to DPIE for information on 5/7/19.	Compliant
<b>Car Parking and Service Vehicle Layout</b>				

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"> <li>(a) all vehicles must enter and leave the Site in a forward direction;</li> <li>(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</li> <li>(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;</li> <li>(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</li> <li>(e) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed</li> </ul>	<p>DPE approval of staging report 7/5/19. Staging report 18/4/19 DPI Letter of approval 5/9/19</p>	<p>The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. DPE approved the car parking and service layout</p>	Compliant
<b>Bicycle Parking and End-of-Trip Facilities</b>				
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"> <li>a. the provision of a minimum 27 bicycle parking spaces;</li> <li>b. the provision of 4 motorcycle parking spaces;</li> <li>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;</li> <li>d. the provision of end-of-trip facilities for staff in accordance with the ESD Design &amp; As Built rating tool;</li> <li>e. appropriate pedestrian and cyclist advisory signs are to be provided; and</li> <li>f. all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority.</li> </ul>	<p>DPE approval of staging report 7/5/19. Staging report 18/4/19 Arcadia end of trip plans 17-424 CC2 P217_007-3, 15/7/19</p>	<p>The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The CA has verified this as being compliant.</p>	Compliant
<b>Public Domain Works</b>				
B36	<p>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>	<p>Interview with Auditees 25/11/19 Site inspection 25/11/19 Stamped plans for Wonga Road 190529 Consultation records with Council 28/11/18 – 29/05/19 CC1 P217_007-2, 16/4/19 CA email dated 15/07/19 CA email dated 19/12/19</p>	<p>Sighted design and consultation records for Wonga Road works.</p> <p><b>Non-compliance from previous audit: There was no evidence at the time of the audit that the streetscape design and treatment had been to the CAs satisfaction. This has been resolved.</b></p>	Compliant
<b>Compliance Reporting</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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.	Compliance program 09/04/19 and submission correspondence 16/04/19 Preconstruction Compliance report 24/04/19 Interview with Auditees 25/11/19 Construction Compliance Report 1 17/10/19.	The program was submitted >2 weeks prior to construction. The PCCR was submitted prior to construction. <b>Non-compliance: The Construction Compliance Report 1 had not been submitted within 6 months of commencing of construction (i.e.: 6 months from 10/5/19, being 10/11/19).</b>	Non-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	Site inspection 25/11/19	The project is in construction	Not triggered
<b>Sydney Water Approval</b>				
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 Interview with Auditees Sec73 permit for OSD TIR669118.	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. Sydney Water is the only service on the SSD requiring approval for works. No external services affected.	Compliant
<b>PART C DURING CONSTRUCTION</b>				
<b>Approved Plans to be On-site</b>				
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 25/11/19	All certified plans and documents were readily available on site.	Compliant
<b>Site Notice</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C2	<p>A site notice(s):</p> <ul style="list-style-type: none"> <li>(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.</li> <li>(b) is to satisfy all but not be limited to, the following requirements: <ul style="list-style-type: none"> <li>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;</li> <li>ii. the notice is to be durable and weatherproof and is to be displayed throughout the works period;</li> <li>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</li> <li>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.</li> </ul> </li> </ul>	Site inspection 25/11/19	Sighted site notices. They satisfied the requirements of this condition	Compliant
<b>Operation of Plant and Equipment</b>				
C3	<p>All plant and equipment used on site, or to monitor the performance of the development must be:</p> <ul style="list-style-type: none"> <li>(a) maintained in a proper and efficient condition; and</li> <li>(b) operated in a proper and efficient manner</li> </ul>	<p>Mobile plant inspection checklists JCB 541-70 including risk assessments and service records</p> <p>Driver induction records including licence and ticket check.</p> <p>Plant prestart checklists 52, 46, 44, 4931.</p>	<p>A plant onboarding process is being implemented. The process includes check of maintenance records which must be &lt;3 months old.</p> <p>All plant operators licenses are checked to ensure they are competent.</p>	Compliant
<b>Demolition</b>				
C4	<p>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.</p>	<p>Demolition swms 6767</p> <p>Demolition sequence 181019</p> <p>Walan demolition works plan 08/04/19</p> <p>Tree removal plans 190404 AA020001</p> <p>CC1 P217_007-2, 16/4/19</p>	<p>The walan demolition works plan are prepared by the demolition contractor WHS Manager details compliance with AS2601. It is complemented by work method statements.</p> <p>CC1 issued by CA 16/04/19.</p>	Compliant
<b>Construction Hours</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C5	<p>Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:</p> <ul style="list-style-type: none"> <li>(a) between 7:00 am and 6:00 pm, Mondays to Fridays inclusive; and</li> <li>(b) between 8:00 am and 1:00 pm, Saturdays.</li> </ul> <p>No work may be carried out on Sundays or public holidays.</p>	<p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP) Present in subcontracts. Present in the SE-F-20 induction forms TBT 16/06/19, 25/11/19,</p>	<p>The hours are regularly communicated to personnel and are present in project documentation.</p>	Compliant
C6	<p>Activities may be undertaken outside of the hours in condition C5 if required:</p> <ul style="list-style-type: none"> <li>(a) by the Police or a public authority for the delivery of vehicles, plant or materials; or</li> <li>(b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or</li> <li>(c) where the works are inaudible at the nearest sensitive receivers; or</li> <li>(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.</li> </ul> <p>Notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards.</p>	<p>Interview with Auditees 25/11/19</p>	<p>No out of hours works have occurred.</p>	Compliant
C7	<p>Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:</p> <ul style="list-style-type: none"> <li>(a) 9 am to 12 pm, Monday to Friday;</li> <li>(b) 2 pm to 5 pm Monday to Friday; and</li> <li>(c) 9 am to 12 pm, Saturday.</li> </ul>	<p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP)  TBT 16/06/19 and 06/06/19. Present in the SE-F-20 induction forms</p>	<p>The intra-day respite periods have been communicated to personnel and are present in project documentation</p>	Compliant
<b>Implementation of Management Plans</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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).	Documents referred to elsewhere in this Audit Table Site inspection Taylor PEMP, E-PLAN-03 (Rev. April 2019)	<b>Observation: the Project is generally following the Taylor PEMP. Whilst many of the controls and commitments are not in consistent with the approved CEMP, the PEMP is NOT the approved CEMP. The project should explain the relationship between the two, and ensure that it is implementing all commitments and mitigation measures from the approved CEMP prepared in accordance with CoC B15 and all the listed sub-plans within the CoCs.</b>	Compliant
<b>Construction Traffic</b>				
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, and V3 18/11/19 (CTPMSP)  Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSPP)  Site inspection 25/11/19	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
<b>Road Occupancy Licence</b>				
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 Interview with Auditees 25/11/19	A road occupancy licence was obtained by the Project for Wonga Road works during the previous audit period. None have been required for the current audit period.	Compliant
<b>SafeWork Requirements</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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 25/11/19 Site inspection 25/11/19 TBT records 07/03/19 – 18/06/19 TBT records July – November 19	The site is suitably secured to prevent third party access. Project HSE risks are toolboxed, with controls and rules identified for implementation. Refer response to CoC C35 for management of asbestos.	Compliant
<b>Hoarding Requirements</b>				
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 25/11/19	No hoarding on third party property. No b class hoarding required. Hoarding was free of advertising and graffiti.	Compliant
<b>No Obstruction of Public Way</b>				
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 25/11/19 TBT 14/03/19, 05/03/19 TBT July – November 2019	There were no obstructions to public access observed. The need to maintain access is communicated to workforce.	Compliant
<b>Construction Noise Limits</b>				

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.	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP) TBT 21/03/19, 18/06/19, 22/05/19, 16/06/19 and 06/06/19 'Traffic light' report 17/06/19 and 06/06/19, 21/10/19, 25/11/19 Acoustic Logic noise monitoring report 05/06/19 and 25/10/19 Site inspection 25/11/19 Hours of works present in the SE-F-20 induction forms for all staff.	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. The traffic light reports are prepared weekly for the Picton School meetings. Hoarding is in place. Signage on site directs people to respect neighbours. Non-tonal beepers are fitted to some long term plant (where safe to do so).. Monitoring from within the temporary school does not show excessive noise levels	Compliant
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, and V2 06/11/19 (CNVMSP) TBT 16/06/19 Hours of works present in the SE-F-20 induction forms for all staff.	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 25/11/19  Site inspection 25/11/19	Non-tonal beepers are fitted to long term plant.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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
<b>Vibration Criteria</b>				
C18	Vibration caused by construction at any residence or structure outside the site must be limited to: <ul style="list-style-type: none"> <li>(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</li> <li>(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).</li> </ul>	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP) Vibration monitoring reports 1 and 2 03/06/19 and 21/08/19.	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.  <b>Observation: The Project vibration monitoring reports deal with structural damage criteria only and do not assess compliance with human comfort criteria as called up by CoC C18 b).</b>	Compliant
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 25/11/19  Interview with Auditees 25/11/19 Vibration monitoring reports 1 and 2 03/06/19 and 21/08/19	No vibratory rollers are currently being used within 30 metres of residences.  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

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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, and V2 06/11/19 (CNVMSP) Vibration monitoring reports 1 and 2 03/06/19 and 21/08/19 Acoustic Logic noise monitoring report 05/06/19 and 25/10/19	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.	Compliant
<b>Detailed Site Investigation</b>				
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"> <li>a. NSW EPA Sampling Design Guidelines;</li> <li>b. Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017;</li> <li>c. Guidelines for Consultants Reporting on Contamination Sites, 2011; and</li> <li>d. The National Environment Protection (Assessment of Contamination) Measure.</li> </ul>	Site inspection 25/11/19 Douglas Partners in situ waste classification report 21/1/19.	An in situ waste classification report was prepared which carried out further investigations.	Compliant
<b>Tree Protection</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C22	<p>For the duration of the construction works:</p> <ul style="list-style-type: none"> <li>(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;</li> <li>(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;</li> <li>(c) all trees on the site that are not approved for removal must be suitably protected during construction as per recommendations of the Arboricultural Assessment and Tree Management Plan prepared by Horticultural Management Services dated 12 February 2018, and Arboricultural Assessment and Tree Management Plan Addendum prepared by Horticultural Management Services dated 19 October 2018 and Arboriculture Assessment Report Addendum prepared by Horticultural Management Services dated 15 March 2019; and</li> <li>(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.</li> </ul>	<p>Site inspection 25/11/19 Arborist inspection report 15/7/19 and 16/10/19 –</p>	<p>No street trees had been pruned or removed.</p> <p>Non-compliance from previous audit: 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. This is now resolved. Tree protections are in place and arborist inspections have occurred.</p>	Compliant
<b>Dust Minimisation</b>				
C23	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	<p>Site inspection 25/11/19</p> <p>TBT 03/06/19, 25/05/19, 22/05/19, 28/05/1</p> <p>TBT July – November 19</p> <p>SE-F-20 induction forms for all staff.</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>No issues observed.</p>	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"> <li>(a) exposed surfaces and stockpiles are suppressed by regular watering;</li> <li>(b) all trucks entering or leaving the site with loads have their loads covered;</li> <li>(c) trucks associated with the development do not track dirt onto the public road network;</li> <li>(d) public roads used by these trucks are kept clean; and</li> <li>(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</li> </ul>	<p>Site inspection 25/11/19</p> <p>TBT 03/06/19, 25/05/19, 22/05/19, 28/05/19</p> <p>TBT July – November 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 gurni 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
<b>Air Quality Discharges</b>				
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
<b>Erosion and Sediment Control</b>				
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 25/11/19</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 ERS&amp;D controls has been communicated to Project personnel.</p>	Compliant
<b>Imported Soil</b>				



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
C27	The Applicant must: <ul style="list-style-type: none"> <li>(a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site;</li> <li>(b) keep accurate records of the volume and type of fill to be used; and</li> <li>(c) make these records available to the Certifying Authority upon request.</li> </ul>	Interview with Auditees 25/11/19  Site inspection 25/11/19 VENM certificate, Douglas partners 16/10/19	Observation from previous audit: 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. This issue has been resolved without the CEMP capturing this information. A VENM certificate has been obtained for the import of excavated material.	Compliant
<b>Disposal of Seepage and Stormwater</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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 25/11/19</p> <p>Site inspection 25/11/19</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 from previous audit: 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).</p>	Not triggered
<b>Unexpected Finds Protocol- Aboriginal Heritage</b>				
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.	<p>Interview with Auditees 25/11/19</p> <p>Site inspection 25/11/19</p>	There were no unexpected finds reported during the audit period.	Not triggered.

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
<b>Unexpected Finds Protocol- Historic Heritage</b>				
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 25/11/19  Site inspection 25/11/19	There were no unexpected finds reported during the audit period.	Not triggered.
<b>Waste Storage and Processing</b>				
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 25/11/19	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 25/11/19 Site inspection 25/11/19 ACM went to Blacktown Waste EPL11497, dial a dump EPL 13426, Wallan truck dockets and waste tracking forms 1/6/19, Genesis Eastern Creek tip dockets 1/6/19.	Non-compliance from previous audit: 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. This has now been resolved. All material is pre-classified under the Waste Classification Guidelines. Dump-it monthly waste reports identify waste types, volumes, amount recycled, receiving facilities. ACM was tracked and disposed of to a facility lawfully permitted to receive it.	Compliant
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 25/11/19	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. No issues.	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 25/11/19	There is a washout tray on site for use – once cured the concrete is disposed of off site.	Compliant
<b>Handling of Asbestos</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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 ACM went to Blacktown Waste EPL11497, dial a dump EPL 13426, Wallan truck dockets and waste tracking forms 1/6/19, Genesis Eastern Creek tip dockets 1/6/19.	Non-compliance from previous audit: There was no evidence available at the time of the audit that ACM had appropriately disposed of in accordance with the POEO Waste Regulation. This has now been resolved. Evidence of correct disposal of ACM was presented during the audit.	Compliant
<b>Incident Notification, Reporting and Response</b>				
C36	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> 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 25/11/19	No incidents or non-compliances have been identified by the Project.	Not triggered
<b>Non-Compliance Notification</b>				
C37	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Department in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after they identify any non-compliance. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Interview with Auditees 25/11/19	No incidents or non-compliances have been identified by the Project other than those identified through the independent audits.	Not triggered
<b>Independent Environmental Audit</b>				
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	Non-compliance from previous audit: the Audit Program was not submitted until 25/06/19, approximately 6 weeks after	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
		Submission of Program to DPE, 25/06/19	commencement of construction. This is now closed.	
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: <ul style="list-style-type: none"> <li>(a) an initial construction Independent Audit must be undertaken within 8 weeks of the notified commencement date of construction; and</li> <li>(b) a subsequent Independent Audit of construction must be undertaken no later than 6 months from the date of the initial construction Independent Audit.</li> </ul>	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: <ul style="list-style-type: none"> <li>(a) the Independent Audit Program submitted to the Department and the Certifying Authority under condition C38 of this consent; and</li> <li>(b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).</li> </ul>	This audit Previous audit, v1 10/7/19 12/07/19 submission of Audit Report	The audit was conducted in accordance with CoC C38 and the Departments IAPAR. DPIE and CA were provided with copies of the audit report and the response to the findings.	Compliant
C42	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must: <ul style="list-style-type: none"> <li>(a) review and respond to each Independent Audit Report prepared under condition C41 of this consent;</li> <li>(b) submit the response to the Department and the Certifying Authority; and</li> <li>(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.</li> </ul>	<a href="https://www.schoolinfrastructure.nsw.gov.au/projects/p/picton-high-school.html">https://www.schoolinfrastructure.nsw.gov.au/projects/p/picton-high-school.html</a> Notification 5/9/19 regarding publication of audit 12/7/19 submission of Picton response to findings 12/07/19 submission of Audit Report	DPIE and CA were provided with copies of the audit report and the response to the findings. DPIE and CA were notified of Picton's intent to publish the Audit report on the Project website. Publication occurred within 60 days of submission.	Compliant
C43	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.	Works are in early stages of construction.	Works are in early stages of construction.	Not triggered.
<b>Revision of Strategies, Plans and Programs</b>				
C44	Within three months of: <ul style="list-style-type: none"> <li>(e) the submission of a compliance report under condition B37;</li> <li>(f) the submission of an incident report under condition C36;</li> <li>(g) the submission of an Independent Audit under condition C40;</li> <li>(h) the issue of a direction of the Planning Secretary under condition A2 which requires a review,</li> </ul> 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 25/11/19 Previous audit, v1 submission 12/07/19 Pre-construction Compliance report 24/04/19 Picton High Statutory Planning update 13/06/19 Revision dates on updated plans	<b>Non-compliance: The first review was required 3 months from the submission of the Pre-construction Compliance Report, (being 24/07/19). There is no evidence to show that a review was conducted, or that the stakeholders were notified of that review.</b>	Non-compliant
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	Interview with Auditees 25/11/19	DPIE have not made any formal requests to amend documents.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	<p>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.</p> <p><b>Note:</b> <i>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></p>	<p>This audit Pre-construction Compliance report 24/04/19 Previous audit, v1 10/7/19</p>		
<b>Archaeological Work Method Statement</b>				
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.	<p>Interview with Auditees 25/11/19</p> <p>Site inspection 25/11/19</p>	Works along the Hume Highway (Argyle Street) had not commenced at the time of the audit.	Not triggered
<b>PART D PRIOR TO OCCUPATION OR COMMENCEMENT OF USE</b>				
<b>Notification of Occupation</b>				
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
<b>External Walls and Cladding</b>				
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
<b>Protection of Public Infrastructure</b>				
D4	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> <li>e. repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and</li> <li>f. relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development.</li> </ul> <p><b>Note:</b> <i>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.</i></p>		The Project only recently commenced construction	Not triggered
<b>Post-construction Dilapidation Report</b>				
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"> <li>(a) to ascertain whether the construction created any structural damage to adjoining buildings or infrastructure.</li> </ul>		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	(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"> <li>i. compare the post-construction dilapidation report with the pre-construction dilapidation report required by these conditions; and</li> <li>ii. have written confirmation from the relevant authority that there is no adverse structural damage to their infrastructure and roads.</li> </ul> (c) to be forwarded to Council.			
<b>Dedication of Public Road</b>				
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
<b>Roadworks and Access</b>				
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
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
<b>Works as Executed Plans</b>				
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
<b>Utilities and Services</b>				
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
<b>Road Safety Evaluation</b>				
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
<b>Green Travel Plan</b>				
D12	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: <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified traffic consultant in consultation with Council and Transport for NSW;</li> <li>b) 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;</li> <li>c) include specific tools and actions to help achieve the objectives and mode share targets;</li> </ul>		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"> <li>d) 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</li> <li>e) 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.</li> </ul>			
<b>Operational Transport and Access Management Plan</b>				
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"> <li>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;</li> <li>b) the location of all car parking spaces on the school campuses and their allocation (i.e. staff, visitor, accessible, emergency, etc.);</li> <li>c) the location and operational management procedures of the pick-up and drop-off parking, including staff management/traffic controller arrangements;</li> <li>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;</li> <li>e) delivery and services vehicle and bus access and management arrangements;</li> <li>f) management of approved access arrangements;</li> <li>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;</li> <li>h) car parking arrangements and management associated with the proposed use of school facilities by community members; and</li> <li>i) a monitoring and review program.</li> </ul> <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
<b>Evacuation and Emergency Management Plan</b>				
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
<b>School Zones</b>				
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.</p>		The Project only recently commenced construction	Not triggered



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	<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>			
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
<b>Mechanical Ventilation</b>				
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"> <li>a) the BCA;</li> <li>b) AS 1668.2-2012 The use of air-conditioning in buildings- Mechanical ventilation in buildings and other relevant codes;</li> <li>c) the development consent and any relevant modifications; and</li> <li>d) any dispensation granted by the NSW Fire Brigade.</li> </ul>		The Project only recently commenced construction	Not triggered
<b>Road Damage</b>				
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
<b>Fire Safety Certification</b>				
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
<b>Structural Inspection Certificate</b>				
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"> <li>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</li> <li>b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.</li> <li>c) person/s authorised to, for the life of the development</li> </ul>		The Project only recently commenced construction	Not triggered
<b>Compliance with Food Code</b>				
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		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	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.			
<b>Stormwater Quality Management Plan</b>				
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"> <li>a) maintenance schedule of all stormwater quality treatment devices;</li> <li>b) record and reporting details;</li> <li>c) relevant contact information; and</li> <li>d) Work Health and Safety requirements</li> </ul>		The Project only recently commenced construction	Not triggered
<b>Rainwater Harvesting</b>				
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
<b>Warm Water Systems and Cooling Systems</b>				
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
<b>Outdoor Lighting</b>				
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"> <li>a) comply with the latest version of AS 4282-1997 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and</li> <li>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.</li> </ul> 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
<b>Signage</b>				
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
<b>Operational Waste Management Plan</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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"> <li>a) detail the type and quantity of waste to be generated during operation of the development;</li> <li>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);</li> <li>c) detail the materials to be reused or recycled, either on or off site; and</li> <li>d) include the Management and Mitigation Measures included in RtS</li> </ul>		The Project only recently commenced construction	Not triggered
<b>Validation Report</b>				
D33	<p>The Applicant must prepare a Validation Report for the development. The Validation Report must:</p> <ul style="list-style-type: none"> <li>a) be prepared by an EPA accredited Site Auditor;</li> <li>b) be submitted to EPA, the Planning Secretary and the Certifying Authority for information one month after the completion of remediation works;</li> <li>c) be prepared in accordance with the RAP and the <i>Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites</i> (OEH, 2011);</li> <li>d) include, but not be limited to: <ul style="list-style-type: none"> <li>(i) comment on the extent and nature of the remediation undertaken;</li> <li>(ii) describe the location, nature and extent of any remaining contamination on site;</li> <li>(iii) sampling and analysis plan and sampling methodology;</li> <li>(iv) results of sampling of treated material, compared with the treatment criteria;</li> <li>(v) details of the volume of treated material emplaced within the containment cell and its location;</li> <li>(vi) results of any validation sampling, compared to relevant guidelines/criteria;</li> <li>(vii) discussion of the suitability the remediated areas for the intended land use; and</li> <li>(viii) any other requirement relevant to the project.</li> </ul> </li> </ul>		The Project only recently commenced construction	Not triggered
<b>Site Audit Report and Site Audit Statement</b>				
D34	<p>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).</p>		The Project only recently commenced construction	Not triggered
D35	<p>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).</p>		The Project only recently commenced construction	Not triggered
<b>Landscaping</b>				
D36	<p>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:</p> <ul style="list-style-type: none"> <li>a) Include revised landscape plan as per condition B4 to include planting in accordance with the approved Softscape   Tree Size Specification &amp; Formal Softscape Areas (issue B)</li> </ul>		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	<p>prepared by Arcadia Landscape Architecture dated March 2019 and at least 14 additional canopy trees;</p> <p>b) detail the species to be planted on-site;</p> <p>c) include details of the area surrounding the education trail is to be s to be rehabilitated with local native plants;</p> <p>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;</p> <p>e) include details of the installation of artificial nest boxes which are suitable to native fauna;</p> <p>f) detail that the seeds from native plants to be removed is collected and used in the landscape area;</p> <p>g) provide an ongoing weed control and maintenance program to maintain the existing and new remnant native vegetations;</p> <p>h) describe the monitoring and maintenance measures to manage revegetation and landscaping works; and</p> <p>i) comply with the principles of Appendix 5 of <i>Planning for Bush Fire Protection 2006</i>.</p>			
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
<b>Asset Protection Zones</b>				
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
<b>Speed Limit Authorisation</b>				
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> <p>a) a copy of the Conditions of Consent;</p> <p>b) the proposed school commencement/opening date;</p> <p>c) two sets of detailed design plans showing the following:</p> <p>(i) accurate Site boundaries;</p> <p>(ii) details of all road reserves, adjacent to the Site boundaries;</p> <p>(iii) all proposed access points from the Site to the public road network and any additional conditions imposed/proposed on their use;</p> <p>(iv) all existing and proposed pedestrian crossing facilities on the adjacent road network;</p> <p>(v) all existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings); and</p> <p>(vi) all existing and proposed street furniture and street trees.</p>		The Project only recently commenced construction	Not triggered
<b>PART E POST OCCUPATION</b>				
<b>Out of Hours Event Management Plan</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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"> <li>a) the number of attendees, time and duration;</li> <li>b) arrival and departure times and modes of transport;</li> <li>c) where relevant, a schedule of all annual events;</li> <li>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);</li> <li>e) measures to minimise localised traffic and parking impacts; and</li> <li>f) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.</li> </ul> <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>		The Project only recently commenced construction	Not triggered
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> <ul style="list-style-type: none"> <li>a) the number of attendees, time and duration;</li> <li>b) arrival and departure times and modes of transport;</li> <li>c) where relevant, a schedule of all annual events;</li> <li>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);</li> <li>e) measures to minimise localised traffic and parking impacts; and</li> <li>f) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.</li> </ul> <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
<b>Operation of Plant and Equipment</b>				
E3	<p>All plant and equipment used on site, or to monitor the performance of the development must be:</p> <ul style="list-style-type: none"> <li>a) maintained in a proper and efficient condition; and</li> <li>b) operated in a proper and efficient manner.</li> </ul>		The Project only recently commenced construction	Not triggered
<b>Community Communication Strategy</b>				
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
<b>Operational Noise Limits</b>				
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 and Section 4.55 Acoustic Assessment report prepared by GHD dated January 2019.		The Project only recently commenced construction	Not triggered
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		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
	hours, must not exceed 5 dB(A) above the background noise level when measured at the boundary of any sensitive receiver.			
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 and Section 4.55 Acoustic Assessment report prepared by GHD dated January 2019. 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 <ul style="list-style-type: none"> <li>a) During weekday mornings;</li> <li>b) Later than 6:00 pm on weeknights; and</li> <li>c) Other than between the hours of 8:00 am and 6:00 pm on Saturdays; and during Sundays and public holidays.</li> </ul>		The Project only recently commenced construction	Not triggered
<b>Unobstructed Driveways and Parking Areas</b>				
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
<b>Green Travel Plan</b>				
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
<b>Outdoor Lighting</b>				
E13	Notwithstanding Condition D27, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.		The Project only recently commenced construction	Not triggered
<b>Fire Safety Certificate</b>				
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
<b>Landscaping</b>				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and Recommendations	Compliance Status
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
<b>Asset Protection Zones</b>				
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
<b>Ecologically Sustainable Development</b>				
E18	Within six months of commencement of operation, unless otherwise agreed by the Planning Secretary, confirmation that the completed development achieves ecologically sustainable design outcomes to achieve an equivalent of a minimum 4 star green star rating must be submitted to the satisfaction of the Planning Secretary		The Project only recently commenced construction	Not triggered

## Appendix B. Planning Secretary agreement of Independent Auditors



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

Contact: Khalid Abubaker  
Phone: 02 8572 1096  
Email: [compliance@planning.nsw.gov.au](mailto: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 Approval 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 C. Consultation records**

## Derek Low

---

**From:** Rachael Chick  
**Sent:** Tuesday, 5 November 2019 4:21 PM  
**To:** council@wollondilly.nsw.gov.au  
**Cc:** Derek Low  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

The approved auditors are currently preparing to undertake the second independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 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](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>

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

If you have any questions, please feel free to contact Derek Low on 0402 403 716 or [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au).

Kind regards,

**Rachael Chick**  
Environmental Consultant



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E: [rchick@wolfpeak.com.au](mailto:rchick@wolfpeak.com.au)

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

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)

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## Derek Low

---

**From:** Michael Buckley <Michael.Buckley@wollondilly.nsw.gov.au>  
**Sent:** Thursday, 7 November 2019 9:45 AM  
**To:** Rachael Chick  
**Subject:** FW: Independent Audit of Picton High School Redevelopment (SSD 8640)

**Importance:** High

Morning, Rachael.

Regarding your earlier email dated 5 November 2019 below. Please find the email trail below with concerns raised by my colleagues, .....



**Michael Buckley**  
Development Assessment Team Leader

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



---

**From:** Norma Toweel  
**Sent:** Thursday, 7 November 2019 9:37 AM  
**To:** Toni Averay <Toni.Averay@wollondilly.nsw.gov.au>; Michael Buckley <Michael.Buckley@wollondilly.nsw.gov.au>; Robyn Cooper <Robyn.Cooper@wollondilly.nsw.gov.au>; Mike Nelson <Mike.Nelson@wollondilly.nsw.gov.au>  
**Subject:** RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

My concerns are:

- Access to the support classes - all from Wonga Road – no parking provided, no footpaths
- Access to the school office and visitor entrance once main gate on Argyle Street is closed - all from Wonga road, no footpaths, no parking
- Construction of turn circle/bus bays in Wonga starts on 2 December 2019 – how are they going to manage access while constructing the road?
- Pedestrians Safety - no formed footpaths on either leg of Wonga Road
- Increased traffic movements at the intersection of Argyle Street and Wonga Road – roundabout still the preferred treatment
- Once turn circle is constructed – interaction between buses/pedestrians and light vehicles who still have a need to drop off students/visit the office – with no on street parking

Regards

Norma

**Norma Toweel**  
Infrastructure Coordinator  
**E:** [Norma.Toweel@wollondilly.nsw.gov.au](mailto:Norma.Toweel@wollondilly.nsw.gov.au)  
**P:** 0246779553

---

**From:** Toni Averay  
**Sent:** Wednesday, 6 November 2019 8:53 PM  
**To:** Michael Buckley <[Michael.Buckley@wollondilly.nsw.gov.au](mailto:Michael.Buckley@wollondilly.nsw.gov.au)>; Robyn Cooper <[Robyn.Cooper@wollondilly.nsw.gov.au](mailto:Robyn.Cooper@wollondilly.nsw.gov.au)>; Mike Nelson <[Mike.Nelson@wollondilly.nsw.gov.au](mailto:Mike.Nelson@wollondilly.nsw.gov.au)>; Norma Toweel <[Norma.Toweel@wollondilly.nsw.gov.au](mailto:Norma.Toweel@wollondilly.nsw.gov.au)>  
**Subject:** RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Michael

My concerns would be around traffic and parking management and the lack of access into the school for visitors. Also the management of construction worker vehicles – they are currently taking up any available on street parking, but I think this one is being addressed.

Robyn over to you for further comment please.  
Thanks!

### Toni Averay

Director Planning

**E:** [Toni.Averay@wollondilly.nsw.gov.au](mailto:Toni.Averay@wollondilly.nsw.gov.au)

**P:** 0246779777

**M:** 0436845541

---

**From:** Michael Buckley  
**Sent:** Wednesday, 6 November 2019 7:22 AM  
**To:** Robyn Cooper; Mike Nelson; Norma Toweel  
**Cc:** Toni Averay  
**Subject:** FW: Independent Audit of Picton High School Redevelopment (SSD 8640)  
**Importance:** High

FYI people. Feel free to submit any matters of concern.

I previously emailed the DOP on issues pertaining to the potential construction of a car park for works on an adjoining site (south) fronting Argyle Street.

Regards, Michael

### Michael Buckley

Development Assessment Team Leader

**E:** [Michael.Buckley@wollondilly.nsw.gov.au](mailto:Michael.Buckley@wollondilly.nsw.gov.au)

**P:** 0246779614

---

**From:** Rachael Chick [<mailto:rchick@wolfpeak.com.au>]  
**Sent:** Tuesday, 5 November 2019 4:21 PM  
**To:** Wollondilly Shire Council <[council@wollondilly.nsw.gov.au](mailto:council@wollondilly.nsw.gov.au)>  
**Cc:** Derek Low <[dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au)>  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

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

If you have any questions, please feel free to contact Derek Low on 0402 403 716 or [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au).

Kind regards,

**Rachael Chick**  
Environmental Consultant



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E: [rchick@wolfpeak.com.au](mailto:rchick@wolfpeak.com.au)

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

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)

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## Derek Low

---

**From:** Wollondilly Shire Council <council@wollondilly.nsw.gov.au>  
**Sent:** Tuesday, 5 November 2019 4:22 PM  
**To:** Rachael Chick  
**Subject:** Wollondilly Shire Council Acknowledgement - PLEASE DO NOT REPLY TO THIS EMAIL  
Independent Audit of Picton High School Redevelopment (SSD 8640)

Thank you very much for your message. Your message is important to Council, we will respond to your request in a timely manner.

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Phone: 02 4677 1100

PICTON.



---

**From:** rchick@wolfpeak.com.au  
**Sent:** 11/5/2019 4:21:26 PM +11:00  
**To:** council@wollondilly.nsw.gov.au  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)  
Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

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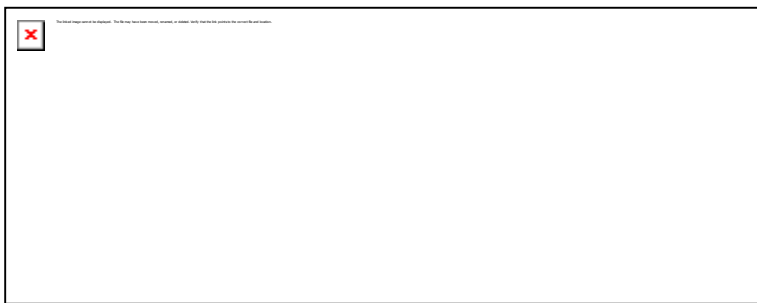
If you have any questions, please feel free to contact Derek Low on 0402 403 716 or [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au).

Kind regards,

**Rachael Chick**  
Environmental Consultant



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E: [rchick@wolfpeak.com.au](mailto:rchick@wolfpeak.com.au)

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

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## Derek Low

---

**From:** Michael Buckley <Michael.Buckley@wollondilly.nsw.gov.au>  
**Sent:** Thursday, 14 November 2019 7:40 AM  
**To:** Rachael Chick  
**Cc:** Derek Low  
**Subject:** RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Rachael.

This what I emailed Derek on the 13 June 2019, below.

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.*

*And more;*

- Access to the support classes - all from Wonga Road – no parking provided, no footpaths

- Access to the school office and visitor entrance once main gate on Argyle Street is closed - all from Wonga road, no footpaths, no parking
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- Increased traffic movements at the intersection of Argyle Street and Wonga Road – roundabout still the preferred treatment
- Once turn circle is constructed – interaction between buses/pedestrians and light vehicles who still have a need to drop off students/visit the office – with no on street parking.

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](mailto:Michael.Buckley@wollondilly.nsw.gov.au)  
**W** <http://www.wollondilly.nsw.gov.au>




---

**From:** Rachael Chick [mailto:rchick@wolfpeak.com.au]  
**Sent:** Tuesday, 5 November 2019 4:21 PM  
**To:** Wollondilly Shire Council <council@wollondilly.nsw.gov.au>  
**Cc:** Derek Low <dlow@wolfpeak.com.au>  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

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Kind regards,

**Rachael Chick**  
Environmental Consultant



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

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## Derek Low

---

**From:** Rachael Chick  
**Sent:** Tuesday, 5 November 2019 4:18 PM  
**To:** compliance@planning.nsw.gov.au; Kate Moore (DPE)  
**Cc:** Derek Low  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

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Kind regards,

**Rachael Chick**  
Environmental Consultant



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## Derek Low

---

**From:** DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>  
**Sent:** Tuesday, 5 November 2019 4:19 PM  
**To:** Rachael Chick  
**Subject:** Automatic Response

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](mailto:compliance@planning.nsw.gov.au)

## Derek Low

---

**From:** Michaela Burgess <Michaela.Burgess@planning.nsw.gov.au>  
**Sent:** Wednesday, 20 November 2019 1:48 PM  
**To:** Rachael Chick  
**Cc:** Kate Moore (DPE)  
**Subject:** RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon Rachael,

Thank you for your email. The Department requests that all conditions of consent for SSD 8640 are assessed, and that the audit is conducted in accordance with the requirements of condition C41 of SSD 8640.

In addition to the above, please focus on assessing compliance with conditions A12A – A12D, and C22 which relate to staging and tree protection.

If you have any questions please do not hesitate to contact me.

Kind regards  
Michaela

**Michaela Burgess**  
**Senior Compliance Officer**

Planning & Assessment | Department of Planning, Industry and Environment  
**T** 02 8217 2055 | **M** 0427 749 597 | **E** [michaela.burgess@planning.nsw.gov.au](mailto:michaela.burgess@planning.nsw.gov.au)  
GPO Box 39 | 320 Pitt St, Sydney NSW 2001  
[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)

Please direct all email correspondence to [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)



Planning,  
Industry &  
Environment

*The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

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**From:** Rachael Chick <rchick@wolfpeak.com.au>  
**Sent:** Tuesday, 5 November 2019 4:18 PM  
**To:** DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>; Kate Moore (DPE) <Kate.Moore@planning.nsw.gov.au>  
**Cc:** Derek Low <dlow@wolfpeak.com.au>  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).



The approved auditors are currently preparing to undertake the second independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 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](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 25 November 2019 and pertains to post-approval requirements and compliance.

The purpose of this email is to consult with the Department on the scope of the audit.

As you will see, the required scope of the audit (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, we kindly request that the Department confirm any key issues it would like examined, relating to post-approval requirements and compliance.

If you have any questions, please feel free to contact Derek Low on 0402 403 716 or [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au).

Kind regards,

**Rachael Chick**  
Environmental Consultant



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E: [rchick@wolfpeak.com.au](mailto:rchick@wolfpeak.com.au)

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

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)

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## Derek Low

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**From:** Rachael Chick  
**Sent:** Tuesday, 5 November 2019 4:14 PM  
**To:** info@epa.nsw.gov.au  
**Cc:** Derek Low  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

The approved auditors are currently preparing to undertake the second independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 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](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 25 November 2019 and pertains to post-approval requirements and compliance.

The purpose of this email is to consult 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 of the audit (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, we kindly request that the EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance.

If you have any questions, please feel free to contact Derek Low on 0402 403 716 or [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au).

Kind regards,

**Rachael Chick**  
Environmental Consultant



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

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)

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**♻️ Consider the environment. Please don't print this e-mail unless really necessary.**

**Derek Low**

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**From:** Environment Line <info@environment.nsw.gov.au>  
**Sent:** Tuesday, 5 November 2019 4:15 PM  
**To:** Rachael Chick  
**Subject:** Thank you for your email. Your Reference Id is 00886052 (ref:\_00D7F6iTix.\_5007Ft80ll:ref)



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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](http://www.environment.nsw.gov.au) or [www.epa.nsw.gov.au](http://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](http://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.\_5007Ft80ll:ref

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## Derek Low

---

**From:** Rachael Chick  
**Sent:** Tuesday, 5 November 2019 4:10 PM  
**To:** info@environment.nsw.gov.au; HERITAGEMailbox@environment.nsw.gov.au  
**Cc:** Derek Low  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

The approved auditors are currently preparing to undertake the second independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 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](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 25 November 2019 and pertains to post-approval requirements and compliance.

The purpose of this email is to consult with OEH (Operations and Heritage) on the scope of the audit, in accordance with Section 3.2 of the Department's IAPAR. 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 of the audit (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, we kindly request that OEH confirm any key issues it would like examined, relating to post-approval requirements and compliance.

If you have any questions, please feel free to contact Derek Low on 0402 403 716 or [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au).

Kind regards,

**Rachael Chick**  
Environmental Consultant



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E: [rchick@wolfpeak.com.au](mailto:rchick@wolfpeak.com.au)

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:** Tuesday, 5 November 2019 4:11 PM  
**To:** Rachael Chick  
**Subject:** Thank you for your email. Your Reference Id is 00886048 (ref:\_00D7F6iTix.\_5007Ft80id: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](http://www.environment.nsw.gov.au) or [www.epa.nsw.gov.au](http://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](http://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.\_5007Ft80id:ref

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## Derek Low

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**From:** OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>  
**Sent:** Tuesday, 5 November 2019 4:11 PM  
**To:** Rachael Chick  
**Subject:** Automated Response  
**Attachments:** image002.png

Thank you for your email to Heritage, Department of Premier and Cabinet. We will respond to your email as soon as possible.

### Applications

If you have submitted an application under the *Heritage Act 1977*, it will first be reviewed for completeness and then allocated to the appropriate assessment team. An officer will contact you if any additional information is required. The completeness check and allocation is generally completed within 7-14 business days.

We aim to process applications within the timeframes below:

Application Type	Timeframe (Commences once an application is complete)
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

### State Heritage or Aboriginal Place Nominations

Nominations for listing under the *Heritage Act 1977* (State Heritage Register) must accompany a nomination form available on our website (<https://www.environment.nsw.gov.au/Heritage/listings/nominateshr.htm>). SHR Nominations are considered by the State Heritage Register Committee who will decide whether the nomination will proceed to the next stage of assessment.

Nominations for Aboriginal Place listings under the *National Parks and Wildlife Act 1974*, are allocated to the relevant team within 7 business days. An officer will contact you if any additional information is required.

### Former Office of Environment and Heritage enquiries

If your email relates to other areas formerly referred to the Office of Environment and Heritage, please forward your email to the Department of Planning, Infrastructure and Environment, at [info@service.nsw.gov.au](mailto:info@service.nsw.gov.au).

Further information is also available at [www.environment.nsw.gov.au/heritage/](http://www.environment.nsw.gov.au/heritage/).

Sincerely



Customer Strategies  
Heritage, Department of  
Premier and Cabinet.

Locked Bag 5020, Parramatta 2124  
T (02) 9873 8500



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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.  
If you are not the intended recipient, please notify the sender and then delete it immediately.  
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## Derek Low

---

**From:** Anna London <Anna.London@environment.nsw.gov.au>  
**Sent:** Tuesday, 12 November 2019 9:40 AM  
**To:** Rachael Chick; OEH ROG Greater Sydney Region Planning Unit Mailbox  
**Cc:** Derek Low  
**Subject:** RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Rachael,

In accordance with our previous correspondence to Derek Low (dated 20 June 2019), 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 DPIE. As a result we have no particular comments to direct the scope of your post approval audit.

As previously advised, when considering unexpected finds protocols for historical archaeology it is important that the procedure makes reference to s146 of the *Heritage Act 1977* (notification of discovery of relics). Further, if your audit finds that relics have been discovered then it is important that the proponent has notified the Heritage Council of NSW.

The Greater Sydney Planning Team within the Climate Change & Sustainability Division (Department of Planning, Industry and Environment) - deal with biodiversity and flooding. I have forwarded your request to them.

Please do not hesitate to contact me should you require any clarification.

Regards,

Anna

**Anna London**  
Senior Customer Strategies Officer  
Heritage NSW, Community Engagement  
Department of Premier and Cabinet  
T: 02 9873 8608

---

**From:** Rachael Chick <rchick@wolfpeak.com.au>  
**Sent:** Tuesday, 5 November 2019 4:10 PM  
**To:** INFOEnvironment <info@environment.nsw.gov.au>; OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>  
**Cc:** Derek Low <dlow@wolfpeak.com.au>  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

The approved auditors are currently preparing to undertake the second independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 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](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 25 November 2019 and pertains to post-approval requirements and compliance.

The purpose of this email is to consult with OEH (Operations and Heritage) on the scope of the audit, in accordance with Section 3.2 of the Department's IAPAR. 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 of the audit (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, we kindly request that OEH confirm any key issues it would like examined, relating to post-approval requirements and compliance.

If you have any questions, please feel free to contact Derek Low on 0402 403 716 or [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au).

Kind regards,

**Rachael Chick**  
Environmental Consultant



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E: [rchick@wolfpeak.com.au](mailto:rchick@wolfpeak.com.au)

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

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## Derek Low

---

**From:** Rachael Chick  
**Sent:** Tuesday, 5 November 2019 4:06 PM  
**To:** webmaster@rfs.nsw.gov.au  
**Cc:** Derek Low  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

The approved auditors are currently preparing to undertake the second independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 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](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 25 November 2019 and pertains to post-approval requirements and compliance.

The purpose of this email is to consult with the RFS on the scope of the audit, in accordance with Section 3.2 of the Department's IAPAR. 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 of the audit (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, we kindly request the RFS confirm any key issues it would like examined, relating to post-approval requirements and compliance.

If you have any questions, please feel free to contact Derek Low on 0402 403 716 or [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au).

Kind regards,

Rachael Chick  
Environmental Consultant



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

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## Derek Low

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**From:** Webmaster <webmaster@rfs.nsw.gov.au>  
**Sent:** Tuesday, 5 November 2019 4:33 PM  
**To:** Rachael Chick  
**Subject:** RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Rachael

Thank you for your email.

Your enquiry has been forwarded to the relevant department.

Regards  
NSW Rural Fire Service

---

**From:** Rachael Chick <rchick@wolfpeak.com.au>  
**Sent:** Tuesday, 5 November 2019 4:06 PM  
**To:** Webmaster <webmaster@rfs.nsw.gov.au>  
**Cc:** Derek Low <dlow@wolfpeak.com.au>  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

The approved auditors are currently preparing to undertake the second independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 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](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 25 November 2019 and pertains to post-approval requirements and compliance.

The purpose of this email is to consult with the RFS on the scope of the audit, in accordance with Section 3.2 of the Department's IAPAR. 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 of the audit (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, we kindly request the RFS confirm any key issues it would like examined, relating to post-approval requirements and compliance.

If you have any questions, please feel free to contact Derek Low on 0402 403 716 or [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au).

Kind regards,

Rachael Chick

Environmental Consultant



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E: [rchick@wolfpeak.com.au](mailto:rchick@wolfpeak.com.au)

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## Derek Low

---

**From:** Rachael Chick  
**Sent:** Tuesday, 5 November 2019 4:02 PM  
**To:** [urbangrowth@sydneywater.com.au](mailto:urbangrowth@sydneywater.com.au)  
**Cc:** Derek Low  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

The approved auditors are currently preparing to undertake the second independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 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](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 25 November 2019 and pertains to post-approval requirements and compliance.

The purpose of this email is to consult with Sydney Water on the scope of the audit, in accordance with Section 3.2 of the Department's IAPAR. I understand that Sydney Water provided advice during the assessment phase with regards to lack of supply and water infrastructure. These were considered by the Department, and the Project was approved subject to conditions.

As you will see the required scope of the audit (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, we kindly request Sydney Water confirm any key issues it would like examined, relating to post-approval requirements and compliance.

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Kind regards,

Rachael Chick  
Environmental Consultant



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## Derek Low

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**From:** Rachael Chick  
**Sent:** Tuesday, 5 November 2019 12:35 PM  
**To:** stakeholder.relations@transport.nsw.gov.au  
**Cc:** Derek Low  
**Subject:** Independent Audit of Picton High School Redevelopment (SSD 8640)

Good afternoon,

I write on behalf of Derek Low and Steve Fermio of WolfPeak Pty Ltd, the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

The approved auditors are currently preparing to undertake the second independent audit on the Project. The audit is required to be conducted in accordance with SSD 8640 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](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 25 November 2019 and pertains to post-approval requirements and compliance.

The purpose of this email is to consult with Transport for NSW on the scope of the audit, in accordance with Section 3.2 of the Department's IAPAR. I understand that Transport for NSW 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, we kindly request Transport for NSW confirm any key issues it would like examined, relating to post-approval requirements and compliance.

If you have any questions, please feel free to contact Derek Low on 0402 403 716 or [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au).

Kind regards,

Rachael Chick  
Environmental Consultant



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## Appendix D. 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	12/12/19

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

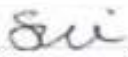
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- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
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Name of auditor	Steve Fermio
Signature	
Qualification	Bachelor of Science (Honours) Exemplar Global Auditor Number 110498
Company	WolfPeak Pty Ltd
Company address	Sulte 2, Level 10, 189 Kent Street Sydney NSW 2000

Appendix E. Site inspection photographs.



Photo 1: site signage

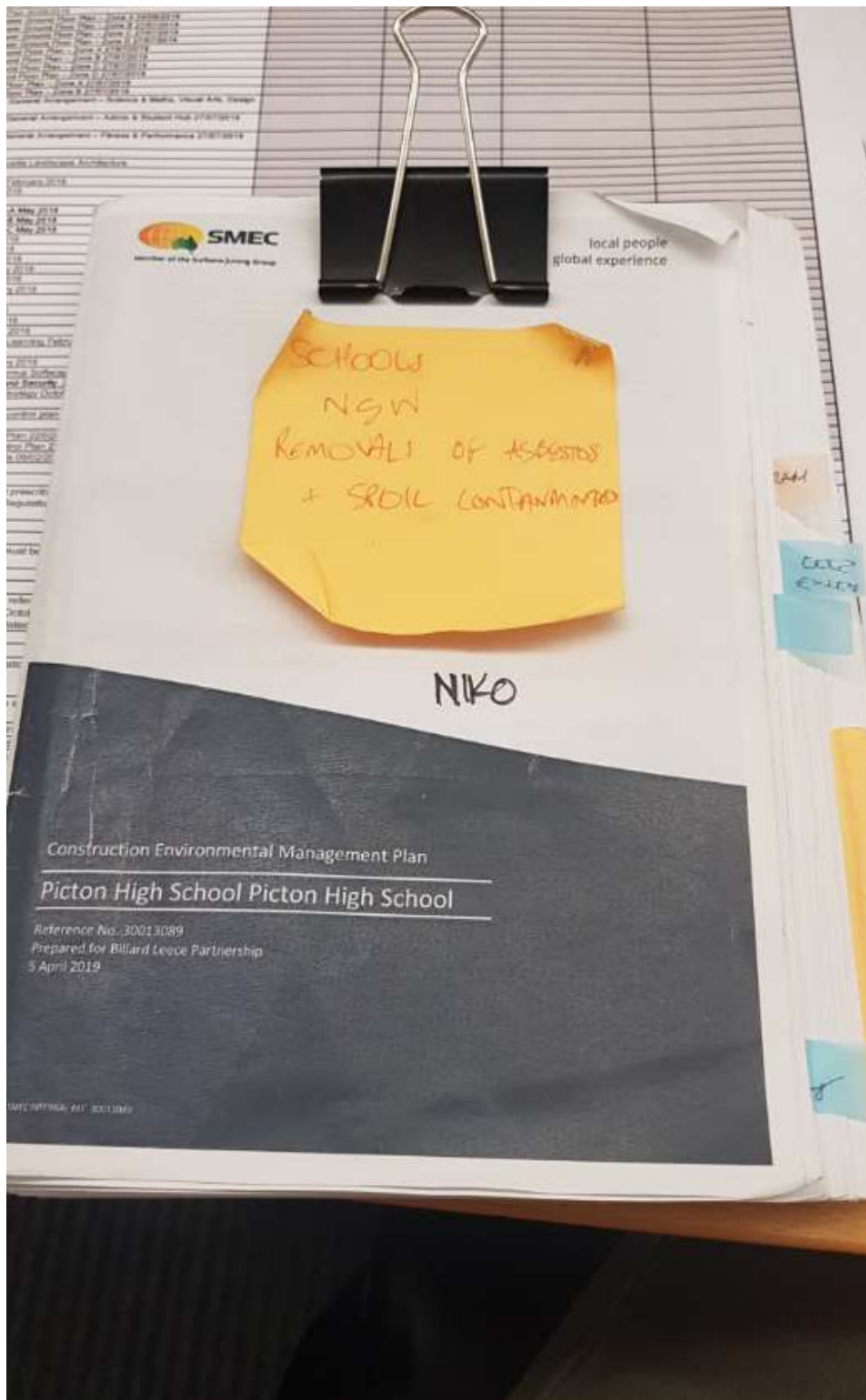


Photo 2: CEMP readily available





Photo 3: Signage relating to noise minimization

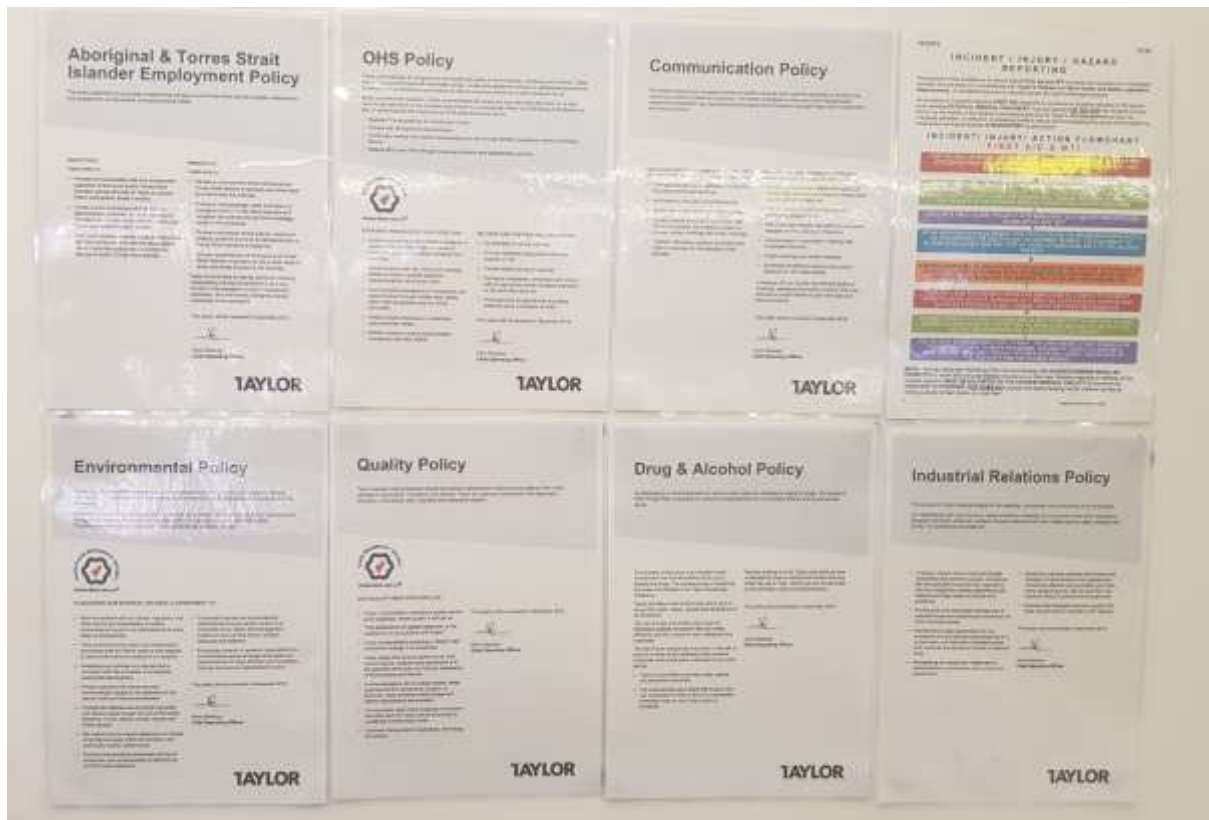


Photo 4: Taylor Policies



Photo 5: hazardous chemical storage (no issues)



**Photo 6: OSD installation works**



**Photo 7: spill kits readily available**



**Photo 8: Concrete washout trays**



**Photo 9: Tree Protection Zones**



**Photo 10: Material handling, note the dry conditions with watercart available**



**Photo 11: Stabilised access**



**WolfPeak Pty Limited**

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