




PICTON HIGH SCHOOL – SSD 8640

INDEPENDENT AUDIT REPORT

www.wolfpeak.com.au

Revision	Date	Prepared By	Reviewed By	Description
V0	25/06/20	RC	DL	For issue
V1	03/07/20	DL	SF	FINAL

Author name	Derek Low	Reviewer / approver name	Steve Fermio
Author signature		Reviewer / approver signature	
Date	03/07/20	Date	03/07/20

Executive Summary

The NSW Department of Education – Schools Infrastructure NSW (SINSW) are responsible for delivering the Picton High School Redevelopment (PHS, or the Project). The Project involves a staged upgrade to the school to accommodate 580 students and 125 staff and core facilities to accommodate 2,000 students. Consent for the Project was granted on 20 December 2018, State Significant Development (SSD) 8640, subject to a number of Conditions of Consent (CoC).

The objective of this Independent Audit is to satisfy SSD 8640 Schedule 2, CoC C41. It requires that Independent Audits of the development be carried out in accordance with Project's Independent Audit Program and the *Independent Audit Post Approval Requirements* (Department 2018). The Independent Audit seeks to verify compliance with the relevant CoCs and assess the effectiveness of environmental management on the Project. This Audit Report presents the findings from the third Independent Audit for the construction period, covering the period from 26 November 2019 to 22 June 2020.

Construction works began 10 May 2019. Works undertaken during the audit period include civil works, foundations and structure works on the main building, and services on the main building were underway as were roadworks on the rear access off Wonga Road.

Compliance records were very well organised and available at the time of the site inspection and interview with Taylors and Mace personnel on and following 2 June 2020. 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. Detailed findings are presented in Section 3, along with actions to address each of the findings. In summary:

- For the current audit period:
 - There were five non-compliances identified against the CoCs. These relate to contents of the Project Website, submission of documents, and spoil placement. All have been actioned and are now resolved.
 - There was one observation made in relation to the CoCs, which related to contamination.
- For previous audit periods, one observation remains open in relation to CoC A7, pertaining to the relationship with Council.
- The Auditor is also of the opinion that:
 - ongoing engagement with Council is required, with particular focus on delivering safe access to the pop-up school during construction and on optimising operational traffic and access arrangements. As it currently stands, Council are of the position that their concerns around pedestrian access and safety are largely being ignored.
 - the Project needs to proactively manage operations of the new multi-story site sheds on the northern boundary to ensure these do not unduly disrupt the adjacent neighbours.

The Auditor would like to thank the Auditees for their high level of organisation, cooperation and assistance during the Independent Audit.

TABLE OF CONTENTS

TABLE OF CONTENTS	1
1. INTRODUCTION	3
1.1 THE PROJECT	3
1.2 APPROVAL REQUIREMENTS	4
1.3 THE AUDIT TEAM	4
1.4 THE OBJECTIVES OF THE AUDIT	5
1.5 THE AUDIT SCOPE	5
2. AUDIT METHODOLOGY	7
2.1 AUDIT PROCESS	7
2.1.1 AUDIT INITIATION AND SCOPE DEVELOPMENT	8
2.1.2 PREPARING AUDIT ACTIVITIES	8
2.1.3 SITE PERSONNEL INVOLVEMENT	9
2.1.4 SITE INSPECTION	10
2.1.5 DOCUMENT REVIEW	10
2.1.6 GENERATING AUDIT FINDINGS	10
2.1.7 COMPLETING THE AUDIT	11
3. AUDIT FINDINGS	12
3.1 APPROVALS AND DOCUMENTS AUDITED AND EVIDENCE SIGHTED	12
3.2 NON-COMPLIANCES, OBSERVATIONS AND ACTIONS	12
3.3 ADEQUACY OF ENVIRONMENTAL MANAGEMENT PLANS, SUB-PLANS AND POST APPROVAL DOCUMENTS	0
3.4 PROJECT'S EMS	0
3.5 SUMMARY OF NOTICES FROM AGENCIES	0
3.6 OTHER MATTERS CONSIDERED RELEVANT BY THE AUDITOR OR DPIE	0
3.6.1 COUNCIL	0
3.6.2 MULTI-LEVEL SITE SHEDS	1
3.7 COMPLAINTS	2
3.8 INCIDENTS	2
3.9 ACTUAL VERSUS PREDICTED IMPACTS	2
4. CONCLUSIONS	4
5. LIMITATIONS	5
APPENDIX A. SSD 8640 CONDITIONS OF CONSENT (INCLUDING MOD 1)	6

<u>APPENDIX B.</u>	<u>PLANNING SECRETARY AGREEMENT OF INDEPENDENT AUDITORS</u>	
<u>63</u>		
<u>APPENDIX C.</u>	<u>CONSULTATION RECORDS</u>	<u>64</u>
<u>APPENDIX D.</u>	<u>INDEPENDENT AUDIT DECLARATION FORM(S)</u>	<u>65</u>
<u>APPENDIX E.</u>	<u>SITE INSPECTION PHOTOGRAPHS.</u>	<u>67</u>

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), 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 (STEM) 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 civil works, foundations and structure works on the main building, and services on the main building were underway as were roadworks on the rear access off Wonga Road.

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 of Planning Industry and Environment (the Department) document entitled *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 B.

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 26 November 2019 to 22 June 2020.

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 during COVID-19 restrictions and, therefore, some tasks were modified to ensure compliance with social distancing rules and to manage risk.

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.

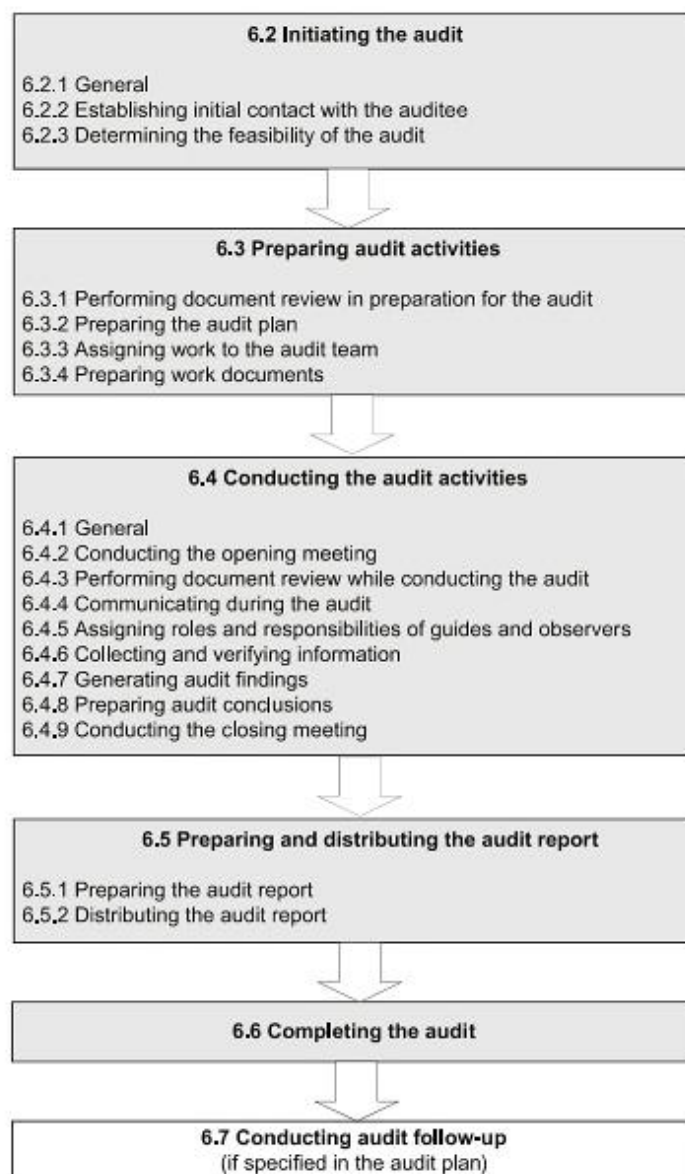


Figure 2: Audit activities overview (AS/NZS ISO 19011:2014). Subclause numbering refers to the relevant subclauses in the Standard.

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 20 May 2020 WolfPeak consulted with the Department, Wollondilly Shire Council and the Environment Protection Authority 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 C.

A summary of the key issues and areas of focus raised by the stakeholders is presented in Table 1.

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 requested that additional focus is placed on the Project's consultation with Wollondilly Shire Council, particularly in relation to conditions relating to operational traffic design and consultation with Council and other stakeholders.	Included in scope. Refer Section 3.6 and Appendix A.
Environment Protection Authority	The EPA requested that the audit consider the fact that dust complaints had been received in relation to the Project.	Included in scope. Refer Appendix A.
Wollondilly Shire Council	Council requested that the audit consider the project's compliance with traffic related issues and management of traffic and access risks. Council also raised concerns over Sydney Water services and overall design and approval of the project and the resulting issues and risks posed by its operation (in particular traffic and access issues).	Included in scope. Refer Section 3.6 and Appendix A.

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 and after 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 and updates 20 January and 2 March 2020 (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 CWMSPP)*
- *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 2 June 2020. The following personnel took part in the audit:

- Michael Randle – Senior Project Manager – Mace Group
- Jack Fenton – Project Manager – Taylor Construction
- Jacqueline Cuzon – Engineer – 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 were presented, preliminary recommendations (as appropriate) were made, and any post-audit actions were confirmed.

Interviews

The Auditor conducted interviews during the site inspection with key personnel involved in Project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development. All other communication was conducted remotely, which included detailed request for information and auditee responses to the request.

2.1.4 Site inspection

The on-site audit activities took place on 2 June 2020. 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 referenced as evidence in Appendix A.

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 was 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 8640 applicable to the works being undertaken. The evidence sighted against each requirement is detailed in Appendix A.

3.2 Non-compliances, Observations and Actions

This Section presents the non-compliances and observations from the third IA, along with the status of findings that remained open from the second IA. Actions in response to each of the findings are also presented. Detailed findings against each CoC are presented in Appendix A.

For the current audit period:

- There were 112 CoCs assessed. A further 56 CoCs relate to requirements to be fulfilled prior to commencement of operations or during operations and were not triggered during the audit period.
- There were five non-compliances identified against the CoCs. These relate to contents of the Project Website, submission of documents, and spoil placement. All have been actioned and are now resolved.
- There was one observation made in relation to the CoCs, which related to contamination.

For previous audit periods, one observation remains open in relation to CoC A7. This pertains to the management of the relationship with Council. Further detail on this matter is presented in Section 3.6.

Table 2: Non-compliances, Observations and Actions

Item	Cond No	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status as at June 2020
JUNE 2019 OPEN AUDIT FINDINGS						
Conditions of Consent SSD 8640 Schedule 2						
1	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>	<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.</p>	By SINSW Project Team by 27/09/19 pending responses by OEH	<p>CLOSED</p> <p>The statement of reasonable equivalence was completed in October. The updated application was lodged to the BCF 21/11/19.</p> <p>BCF trust tax invoice indicates that the ecosystem credits have been retired 18/12/19.</p>
2	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 an ongoing basis.	<p>CLOSED</p> <p>Douglas Partners prepared an updated report 6/1/20 for vibration monitoring undertaken. It includes a statement about human comfort. No exceedances were recorded.</p>
DECEMBER 2019 OPEN AUDIT FINDINGS						

Item	Cond No	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status as at June 2020
Conditions of Consent SSD 8640 Schedule 2						
3	CoC A7	Observation	<p>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.</p> <p>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.</p> <p>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.</p> <p>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>The Project will continue to engage with Council through the Section 138 approval process.</p> <p>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 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 application for Argyle Street and intended to submit its application for these works in February 2020.</p>	<p>Wonga Road works to be completed by the Project Q2 2020.</p> <p>Section 138 application for Argyle Street to be submitted by 28/2/20</p>	<p>OPEN</p> <p>Wonga Road works are ongoing.</p> <p>The Section 138 application was rejected by Council due to concerns over traffic and access operational performance. This matter has been escalated to senior officer level in SINSW for resolution. The Project has engaged the local bus service for testing and reviews. Council have also conducted inspections.</p> <p>Mace, SINSW and Council now have commenced fortnightly meetings to discuss project works. The Project advise that issues are being progressively worked through in a productive way and that Council's previous concerns are being managed. Sighted Meeting minutes 29/5/20.</p> <p>Refer to Section 3.6 regarding issues associated with Council. It is the Auditors opinion that further work by the Project is required to ensure that Council's expectations are managed.</p>

Item	Cond No	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status as at June 2020
4	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 a non-compliance with CoC B15 and the Auditee has responded by reference to a Taylor Project Environmental Management Plan (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>	Project is 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.	Taylor/ SINSW By 28/02/20	CLOSED The PEMP has been appended to the CEMP. Refer to Section 3.3 regarding the adequacy of the document and response to CoC C8 regarding the degree of implementation for the current audit period.
5	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 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>	CTPMSP to be updated to show actual location of contractors' car park. Plan will be reviewed and submitted in accordance with the Consent Conditions.	Taylor/ SINSW By 28/02/20	CLOSED Sighted CTPMSP 18/11/19 (Rev 7). Figure 3-4 of the plan has been amended to reflect the actual set up.

Item	CoC No	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status as at June 2020
6	CoC C44	Non-compliance	<p>CoC C44 requires that within three months of:</p> <ul style="list-style-type: none"> (a) the submission of a compliance report under condition B37; (b) the submission of an incident report under condition C36; (c) the submission of an Independent Audit under condition C40; (d) the issue of a direction of the Planning Secretary under condition A2 which requires a review, <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>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>	<p>CLOSED</p> <p>See June 2020 audit findings, below regarding compliance with this condition for the current audit period.</p>
JUNE 2020 AUDIT FINDINGS						
Conditions of Consent SSD 8640 Schedule 2						
7	CoC A22	Non-compliance	<p>CoC A22 requires 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"> a) make the following information and documents (as they are obtained or approved) publicly available on its website: <ul style="list-style-type: none"> i. the documents referred to in condition A2 of this consent; ii. all current statutory approvals for the development; iii. all approved strategies, plans and programs required under the conditions of this consent; iv. regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent; v. a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; vi. a summary of the current stage and progress of the development; vii. contact details to enquire about the development or to make a complaint; 	<p>Remove all previous CEMP and sub-plan revisions and upload current revisions of these plans. Upload the current complaints register each month. Upload the Construction Compliance Report 1.</p>	<p>Mace / SINSW</p> <p>By 31/07/20</p>	<p>CLOSED</p> <p>The website was updated 02/07/20.</p>

Item	Cond No	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status as at June 2020
			<ul style="list-style-type: none"> viii. a complaints register, updated monthly; ix. audit reports prepared as part of any independent environmental audit of the development and the Applicant's response to the recommendations in any audit report; x. any other matter required by the Planning Secretary; and <p>b) keep such information up to date, to the satisfaction of the Planning Secretary.</p> <p>The website does not contain the current version of the CEMP, CTPMSP, CNVMSP or CSWMSP, nor does it contain the current complaints register or Construction Compliance Report 1.</p>			
8	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). It also requires that the Project make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the Certifying Authority in writing at least seven days before this is done</p> <p>Construction Compliance Report 1 is not available on the website. Construction Compliance Report 2 was not submitted to the Certifying Authority until 11/06/20, after the deadline required by the Departments guideline document.</p>	Upload the Compliance Reports to the website.	<p>SINSW</p> <p>By 31/07/20</p>	<p>CLOSED</p> <p>The Construction Compliance Report 1 was published 02/07/20.</p>

Item	Cond No	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status as at June 2020
9	CoC C31	Non-compliance	<p>CoC C31 requires that 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.</p> <p>Spoil from the Wonga Road works was stockpiled outside of the Project site to enable bus turning trials at the roundabout. The stockpiles were placed within a portion of the road reserve owned and managed by Council.</p> <p>Whilst a technical non-compliance with this condition, Council had agreed to this occurring (in writing on 02/06/20 and verbally in a meeting on 04/06/20) and the stockpiles were promptly removed from the area once bus turning tests were complete. The auditor also notes that tree protection zones were not installed at the spoil storage location (refer photos).</p>	All works in area are complete and have been rectified.	NA	CLOSED
10	CoC C44	Non-compliance	<p>CoC C44 provides that, within three months of:</p> <ol style="list-style-type: none"> the submission of a compliance report under condition B37; the submission of an incident report under condition C36; the submission of an Independent Audit under condition C40; the issue of a direction of the Planning Secretary under condition A2 which requires a review, <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>The review following IA2 (which occurred and was notified to the Department in March 2020) was not notified to the Certifying Authority until 12/06/20.</p>	The Certifying Authority was notified 12/06/20	NA	CLOSED
11	CoC C45	Non-compliance	<p>CoC C45 requires that if necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Certifying Authority. Where revisions are required, the revised document must be submitted to the Certifying Authority for approval within six weeks of the review.</p> <p>The CEMP and sub-plans were last updated on 02/03/20. A copy was not provided to the Certifying Authority until 12/06/20, which is beyond the 6 weeks required by this condition.</p>	The Certifying Authority was notified 12/06/20	NA	CLOSED

12	CoC D33, D34, D35	Observation	<p>CoC D33 requires that the Project prepare a Validation Report for the development. The Validation Report must:</p> <ol style="list-style-type: none"> a) be prepared by an EPA accredited Site Auditor; b) be submitted to EPA, the Planning Secretary and the Certifying Authority for information one month after the completion of remediation works; c) be prepared in accordance with the RAP and the Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites (OEHL, 2011); d) include, but not be limited to: <ol style="list-style-type: none"> i. comment on the extent and nature of the remediation undertaken; ii. describe the location, nature and extent of any remaining contamination on site; iii. sampling and analysis plan and sampling methodology; iv. results of sampling of treated material, compared with the treatment criteria; v. details of the volume of treated material emplaced within the containment cell and its location; vi. results of any validation sampling, compared to relevant guidelines/criteria; vii. discussion of the suitability the remediated areas for the intended land use; and viii. any other requirement relevant to the project. <p>CoC D34 requires that prior to occupation of the building, the Project 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> <p>CoC D35 requires that within three months of submission of the Validation Report required by condition D33, 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> <p>The Auditor has the following observations in relation to these conditions:</p> <ol style="list-style-type: none"> a) Contrary to the wording of CoC D33 a Validation Report is not generally prepared by an EPA accredited Site Auditor. Typically the Site Auditor reviews a Validation Report prepared by a contaminated land consultant prior to the issuing of a Site Audit Statement (as required by CoC D34) 	Seek clarification from the Department on relevance of CoC D33, D34 and D35 and appropriate steps for resolution.	SINSW 31/09/20	OPEN
----	-------------------	-------------	---	---	-------------------	------

Item	Cond No	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status as at June 2020
			<p>b) CoC D33 requires that the Validation Report be submitted to the EPA, the Department and the Certifying Authority one month after completion of remediation and be prepared in accordance with the Remediation Action Plan (RAP). A Detailed Site Investigation was carried out in accordance with CoC C21. The investigation concluded that the building footprints are suitable for their intended use (following the removal of overlying fill which was excavated in preparation of building construction). Remediation works were not required and, therefore, a RAP was not prepared or implemented.</p> <p>c) As no remediation was required, the Auditor is not aware of the need for a EPA accredited Site Auditor to be engaged to review a Validation Report or prepare a Site Audit Statement and Site Audit Report as stated by CoC D34 and D35.</p>			

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 and fit for purpose. Pursuant to previous findings regarding implementation of the Taylor PEMP instead of the approved CEMP, all elements checked were being implemented as per the approved CEMP.

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. Refer to section 3.6 regarding ongoing issues with Council.

3.6 Other matters considered relevant by the Auditor or DPIE

3.6.1 Council

Consultation with Wollondilly Shire Council involved both email contact and a meeting with senior level staff from the planning and Infrastructure teams (held on 4 June 2020). The Council continue to raise significant concerns over:

- Assessment of the Project by the Department and whether or how Council concerns were addressed
- Project design and traffic and access arrangements
- Temporary traffic and access for use during construction
- Provision of services from Sydney Water.

The Auditor notes that the adequacy of the Project application and the rigor of the Department's assessment is outside of the scope of the audit. Nevertheless, the Council considers that their concerns over the Project as a whole, and the perceived stresses on the local streets and sewer services that a 2,000-student school may present have gone unheeded.

The Auditor observed the traffic and access arrangements of the pop-up school and construction of the Project at both morning and afternoon peak periods. The Auditor notes:

- The local area is suffering from congestion during the morning and afternoon peak periods (from users of the pop-up school, construction personnel and other road users) and that drop off and picks ups are occurring in areas where there are no footpaths. Students are required to walk adjacent to parked cars and between parked cars and traffic. That being said, there are other areas on Council controlled roads that also do not have footpaths for safe navigation.
- The temporary traffic arrangements that require a Traffic Control Plan (i.e.: those that have the potential to alter traffic flows) appear to have the relevant plans in place. These are prepared by authorised traffic controllers independent of Council.
- The Project has communicated the designated access and egress to users of the pop-up school. However, unauthorised access points are being used regularly due to their convenience or due to security arrangements outside of morning and afternoon drop off and picks ups. The Auditor is of the opinion that SINSW and the Department of Education (as operators of the temporary school) need to continue to communicate the access arrangements to the school users on a regular basis.
- Council has not approved temporary work permits for Argyle Street works as they are concerned that approval of the temporary works will lead to the establishment of permanent arrangements that do not provide for safe access and egress during operations. The Auditor is not able to determine whether these concerns would be realised should the works proceed as planned as this is a traffic modelling and design issue. A flow on effect of this is that the Project may not gain Council agreement to the Operational Transport and Access Management Plan required by CoC D13. This matter has been escalated to senior officer level in SINSW for resolution.

The Project has commenced fortnightly meetings with the Council. Senior personnel from SINSW, Mace and Council attend and key issues are discussed. This is a positive development and the Auditor encourages all parties to continue the dialogue throughout construction to ensure the Project meets the needs of the community. The Auditor considers the attendance of Department of Education (representatives responsible for running the pop-up school) would also be of value and it appears as though they are not attending at this time.

With regards to Council's concerns over Sydney Water being incapable of providing services to new developments in the area, these issues are outside of the scope of the audit. That being said, this issue was raised by Sydney Water in its advice on the Project's application. The Department elected to consent to the Project proceeding on the basis that the Project obtain approval to connect to Sydney Water's network prior to commencement of operations, and Sydney Water have granted those approvals to date.

3.6.2 Multi-level site sheds

The Project has erected three story site sheds on the northern boundary adjacent to residential properties. The Project has provided evidence of consultation with the affected residents advising them of the arrangement and has covered all the windows facing the residents. A complaint was

received in relation to this on 27 May 2020. In response, SINSW offered the complainant a tour of the sheds to verify that the screening was effective. SINSW consider the matter closed.

Whilst not a strict compliance issue at this time, the site sheds are intrusive to the affected residents and may, if not properly managed, cause issues with noise during early periods as staff are arriving at work for pre-starts. The CNVMSP does not appear to consider the noise generated (or, conversely, attenuated) by this structure.

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/PictonHS_Complaints_register_April_2020.pdf

The Auditor notes that at the time of writing the publicly available complaints register was only current to April 2020. The complaints register current to June 2020 was provided during the audit. At the time of writing, 15 complaints were recorded within the Audit Period. These related to dust, noise, working hours, parking, visual impacts, site drainage, site lighting, asbestos management, and the tower crane. Ten complaints were considered by the Project to be closed, and two - one relating to dust and one to the tower crane - were still open.

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. Temporary works extended onto Council land with their permission. Refer response to CoC C31.	Y
Biodiversity	The Project would result in direct impact of 0.07ha of native vegetation	The CoCs imposed 10 x ecosystem credits to be retired. Refer non-	Y

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
	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).	compliance against CoC B26. The updated application was submitted on 21 November 2019.	
Traffic and access	Minor and temporary disruptions to parking, traffic and access. No heavy vehicles to be parked beyond the Project boundaries.	All heavy vehicles were confined to site. Heavy vehicle movements are minor and using approved routes.	Y
Noise and vibration	Moderate short-term construction noise and vibration impacts on nearby receivers above the relevant Noise Management Levels and vibration criteria.	Noise and vibration impacts are occurring but appear to be generally consistent with that predicted.	Y
Soil and water	Minor and temporary impacts associated with construction erosion and sedimentation.	Erosion and sediment control measures being implemented on site appeared to be consistent with the Project Erosion and Sediment Control Plan. No fugitive dust was observed. The Project had a misting system and portable gervi available to manage dust.	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. Conclusions

The overall outcome of the IA indicated that compliance is being proactively tracked by Taylors and Mace, with some room for improvement in managing Council and community expectations.

Compliance records were very well organised and available at the time of the site inspection and interview with Taylors and Mace personnel on and following 2 June 2020. 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.

Detailed findings are presented in Section 3, along with actions to address each of the findings. In summary:

- For the current audit period:
 - There were 112 CoCs assessed. A further 56 CoCs relate to requirements to be fulfilled prior to commencement of operations or during operations and were not triggered during the audit period.
 - There were five non-compliances identified against the CoCs. These relate to contents of the Project Website, submission of documents, and spoil placement. All have been actioned and are now resolved.
 - There was one observation made in relation to the CoCs, which related to contamination.
- For previous audit periods, one observation remains open in relation to CoC A7, pertaining to the relationship with Council.
- The Auditor is also of the opinion that:
 - ongoing engagement with Council is required, with particular focus on delivering safe access to the pop-up school during construction and on optimising operational traffic and access arrangements. As it currently stands, Council are of the position that their concerns around pedestrian access and safety are largely being ignored.
 - the Project needs to proactively manage operations of the new multi-story site sheds on the northern boundary to ensure these do not unduly disrupt the adjacent neighbours.

The Auditor would like to thank the auditees for their high level of organisation, cooperation and assistance during the IA.

5. Limitations

This Document has been provided by WolfPeak Pty Ltd (WolfPeak) to the Client and is subject to the following limitations:

This Document has been prepared for the particular purpose/s outlined in the WolfPeak proposal/contract/relevant terms of engagement, or as otherwise agreed, between WolfPeak and the Client.

In preparing this Document, WolfPeak has relied upon data, surveys, analyses, designs, plans and other information provided by the Client and other individuals and organisations (the information). Except as otherwise stated in the Document, WolfPeak has not verified the accuracy or completeness of the information. To the extent that the statements, opinions, facts, findings, conclusions and/or recommendations in this Document (conclusions) are based in whole or part on the information, those conclusions are contingent upon the accuracy and completeness of the information. WolfPeak will not be liable in relation to incorrect conclusions should any information be incomplete, incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to WolfPeak.

This Document has been prepared for the exclusive benefit of the Client and no other party. WolfPeak bears no responsibility for the use of this Document, in whole or in part, in other contexts or for any other purpose. WolfPeak bears no responsibility and will not be liable to any other person or organisation for or in relation to any matter dealt with in this Document, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in this Document (including without limitation matters arising from any negligent act or omission of WolfPeak or for any loss or damage suffered by any other party relying upon the matters dealt with or conclusions expressed in this Document). Other parties should not rely upon this Document or the accuracy or completeness of any conclusions and should make their own inquiries and obtain independent advice in relation to such matters.

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 for previous audit	Audit findings and recommendations	Compliance status at previous audit
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 02/06/20	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"> a) in compliance with the conditions of this consent; b) in accordance with all written directions of the Planning Secretary; c) generally, in accordance with the EIS Response to Submissions and Section d) 4.55 Modification Application; e) in accordance with the approved plans in the table below: 	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

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit																																																																				
	<table border="1"> <thead> <tr> <th colspan="4" data-bbox="322 308 831 327">Architectural Plans prepared by Billard Leece Partnership</th> </tr> <tr> <th data-bbox="322 327 434 346">Dwg No.</th> <th data-bbox="434 327 488 346">Rev</th> <th data-bbox="488 327 752 346">Name of Plan</th> <th data-bbox="752 327 831 346">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="322 346 434 381">AA03-0002</td> <td data-bbox="434 346 488 381">E</td> <td data-bbox="488 346 752 381">Site Context Plan</td> <td data-bbox="752 346 831 381">30/08/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 381 434 416">SSD-AA10-0001</td> <td data-bbox="434 381 488 416">E</td> <td data-bbox="488 381 752 416">GA – Lower Ground Floor Plan – Zone A</td> <td data-bbox="752 381 831 416">04/08/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 416 434 451">SSD-AA10-0002</td> <td data-bbox="434 416 488 451">E</td> <td data-bbox="488 416 752 451">GA – Lower Ground Floor Plan – Zone B</td> <td data-bbox="752 416 831 451">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 451 434 486">SSD-AA10-0003</td> <td data-bbox="434 451 488 486">E</td> <td data-bbox="488 451 752 486">GA – Lower Ground Floor Plan – Zone C</td> <td data-bbox="752 451 831 486">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 486 434 521">SSD-AA10-0004</td> <td data-bbox="434 486 488 521">E</td> <td data-bbox="488 486 752 521">GA – Lower Ground Floor Plan – Zone D</td> <td data-bbox="752 486 831 521">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 521 434 557">SSD-AA10-0101</td> <td data-bbox="434 521 488 557">E</td> <td data-bbox="488 521 752 557">GA – Ground Floor Plan – Zone A</td> <td data-bbox="752 521 831 557">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 557 434 592">SSD-AA10-0102</td> <td data-bbox="434 557 488 592">E</td> <td data-bbox="488 557 752 592">GA – Ground Floor Plan – Zone B</td> <td data-bbox="752 557 831 592">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 592 434 627">SSD-AA10-0103</td> <td data-bbox="434 592 488 627">E</td> <td data-bbox="488 592 752 627">GA – Ground Floor Plan – Zone C</td> <td data-bbox="752 592 831 627">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 627 434 662">SSD-AA10-0104</td> <td data-bbox="434 627 488 662">E</td> <td data-bbox="488 627 752 662">GA – Ground Floor Plan – Zone D</td> <td data-bbox="752 627 831 662">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 662 434 697">SSD-AA10-0201</td> <td data-bbox="434 662 488 697">E</td> <td data-bbox="488 662 752 697">GA – First Floor Plan – Zone A</td> <td data-bbox="752 662 831 697">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 697 434 732">SSD-AA10-0202</td> <td data-bbox="434 697 488 732"></td> <td data-bbox="488 697 752 732">GA – First Floor Plan – Zone B</td> <td data-bbox="752 697 831 732">27/07/2018</td> </tr> <tr> <td data-bbox="322 732 434 767">SSD-AA20-0001</td> <td data-bbox="434 732 488 767">E</td> <td data-bbox="488 732 752 767">Elevations – General Arrangement – Science & Maths, Visual Arts, Design & Technology</td> <td data-bbox="752 732 831 767">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 767 434 802">SSD-AA20-0002</td> <td data-bbox="434 767 488 802">E</td> <td data-bbox="488 767 752 802">Elevations – General Arrangement – Admin & Student Hub</td> <td data-bbox="752 767 831 802">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 802 434 837">SSD-AA20-0003</td> <td data-bbox="434 802 488 837">E</td> <td data-bbox="488 802 752 837">Elevations – General Arrangement – Fitness & Performance</td> <td data-bbox="752 802 831 837">27/07/2018 08/01/2019</td> </tr> <tr> <td data-bbox="322 837 434 873">SSD-AA20-0004</td> <td data-bbox="434 837 488 873">A</td> <td data-bbox="488 837 752 873">Elevations – General Arrangement – Support Unit & Metal Works Extension</td> <td data-bbox="752 837 831 873">08/01/2019</td> </tr> </tbody> </table>	Architectural Plans prepared by Billard Leece Partnership				Dwg No.	Rev	Name of Plan	Date	AA03-0002	E	Site Context Plan	30/08/2018 08/01/2019	SSD-AA10-0001	E	GA – Lower Ground Floor Plan – Zone A	04/08/2018 08/01/2019	SSD-AA10-0002	E	GA – Lower Ground Floor Plan – Zone B	27/07/2018 08/01/2019	SSD-AA10-0003	E	GA – Lower Ground Floor Plan – Zone C	27/07/2018 08/01/2019	SSD-AA10-0004	E	GA – Lower Ground Floor Plan – Zone D	27/07/2018 08/01/2019	SSD-AA10-0101	E	GA – Ground Floor Plan – Zone A	27/07/2018 08/01/2019	SSD-AA10-0102	E	GA – Ground Floor Plan – Zone B	27/07/2018 08/01/2019	SSD-AA10-0103	E	GA – Ground Floor Plan – Zone C	27/07/2018 08/01/2019	SSD-AA10-0104	E	GA – Ground Floor Plan – Zone D	27/07/2018 08/01/2019	SSD-AA10-0201	E	GA – First Floor Plan – Zone A	27/07/2018 08/01/2019	SSD-AA10-0202		GA – First Floor Plan – Zone B	27/07/2018	SSD-AA20-0001	E	Elevations – General Arrangement – Science & Maths, Visual Arts, Design & Technology	27/07/2018 08/01/2019	SSD-AA20-0002	E	Elevations – General Arrangement – Admin & Student Hub	27/07/2018 08/01/2019	SSD-AA20-0003	E	Elevations – General Arrangement – Fitness & Performance	27/07/2018 08/01/2019	SSD-AA20-0004	A	Elevations – General Arrangement – Support Unit & Metal Works Extension	08/01/2019			
Architectural Plans prepared by Billard Leece Partnership																																																																								
Dwg No.	Rev	Name of Plan	Date																																																																					
AA03-0002	E	Site Context Plan	30/08/2018 08/01/2019																																																																					
SSD-AA10-0001	E	GA – Lower Ground Floor Plan – Zone A	04/08/2018 08/01/2019																																																																					
SSD-AA10-0002	E	GA – Lower Ground Floor Plan – Zone B	27/07/2018 08/01/2019																																																																					
SSD-AA10-0003	E	GA – Lower Ground Floor Plan – Zone C	27/07/2018 08/01/2019																																																																					
SSD-AA10-0004	E	GA – Lower Ground Floor Plan – Zone D	27/07/2018 08/01/2019																																																																					
SSD-AA10-0101	E	GA – Ground Floor Plan – Zone A	27/07/2018 08/01/2019																																																																					
SSD-AA10-0102	E	GA – Ground Floor Plan – Zone B	27/07/2018 08/01/2019																																																																					
SSD-AA10-0103	E	GA – Ground Floor Plan – Zone C	27/07/2018 08/01/2019																																																																					
SSD-AA10-0104	E	GA – Ground Floor Plan – Zone D	27/07/2018 08/01/2019																																																																					
SSD-AA10-0201	E	GA – First Floor Plan – Zone A	27/07/2018 08/01/2019																																																																					
SSD-AA10-0202		GA – First Floor Plan – Zone B	27/07/2018																																																																					
SSD-AA20-0001	E	Elevations – General Arrangement – Science & Maths, Visual Arts, Design & Technology	27/07/2018 08/01/2019																																																																					
SSD-AA20-0002	E	Elevations – General Arrangement – Admin & Student Hub	27/07/2018 08/01/2019																																																																					
SSD-AA20-0003	E	Elevations – General Arrangement – Fitness & Performance	27/07/2018 08/01/2019																																																																					
SSD-AA20-0004	A	Elevations – General Arrangement – Support Unit & Metal Works Extension	08/01/2019																																																																					

Unique ID	Compliance requirement				Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit																																																																																																																												
	<table border="1"> <thead> <tr> <th colspan="4" data-bbox="309 300 815 320">Landscape Plans prepared by Arcadia Landscape Architecture</th> </tr> <tr> <th data-bbox="309 320 421 341">Dwg No.</th> <th data-bbox="421 320 472 341">Rev</th> <th data-bbox="472 320 734 341">Name of Plan</th> <th data-bbox="734 320 815 341">Date</th> </tr> </thead> <tbody> <tr><td></td><td>B</td><td>Vision Landscape Masterplan</td><td>February 2018</td></tr> <tr><td></td><td>C</td><td>Cultural + Heritage Items</td><td>May 2018</td></tr> <tr><td></td><td>C</td><td>Landscape Sections</td><td>May 2018</td></tr> <tr><td></td><td>C</td><td>Landscape Sections – Section A-A</td><td>May 2018</td></tr> <tr><td></td><td>C</td><td>Landscape Sections – Section B-B</td><td>May 2018</td></tr> <tr><td></td><td>C</td><td>Landscape Sections – Section C-C</td><td>May 2018</td></tr> <tr><td></td><td>B</td><td>Materials Pavement</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Materials Pavement</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Detail Entry Forecourt</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Materials Entry Forecourt</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Detail Terraced Lawns</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Materials Terraced Lawns</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Detail Social Hub</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Materials Social Hub</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Detail Educational Trail</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Materials Educational Trail</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Details Agricultural & Environmental Learning</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Vision Natural Trail</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Softscape Planting Character</td><td>February 2018</td></tr> <tr><td></td><td>B</td><td>Softscape Tree size specification & Formal Softscape Areas</td><td>February 2018 March 2019</td></tr> <tr><td>SSD-SK</td><td>0002</td><td>Front entry – Landscaping and Security</td><td>27/07/2018</td></tr> <tr><td></td><td>D E</td><td>Approach Design Tree Retention + Removal Strategy</td><td>October 2018 January 2019</td></tr> <tr> <th colspan="4" data-bbox="309 1086 815 1107">Concept stormwater, sediment and erosion control plan prepared by Bonacci</th> </tr> <tr> <th data-bbox="309 1107 421 1128">Dwg No.</th> <th data-bbox="421 1107 472 1128">Rev</th> <th data-bbox="472 1107 734 1128">Name of Plan</th> <th data-bbox="734 1107 815 1128">Date</th> </tr> <tr><td>C030</td><td>P5</td><td>Concept Stormwater Management Plan</td><td>22/02/2018</td></tr> <tr><td></td><td>P6</td><td></td><td>22/01/2019</td></tr> <tr><td>C005</td><td>P2 AD</td><td>Concept Sediment and Erosion Control Plan</td><td>22/02/2018 22/01/2019</td></tr> <tr><td>C007</td><td>P1 AB</td><td>Sediment and Erosion Control Details</td><td>09/02/2018 30/11/2018</td></tr> <tr><td>C008</td><td>AB</td><td>Soil and Water Management Computations</td><td>30/11/2018</td></tr> </tbody> </table>				Landscape Plans prepared by Arcadia Landscape Architecture				Dwg No.	Rev	Name of Plan	Date		B	Vision Landscape Masterplan	February 2018		C	Cultural + Heritage Items	May 2018		C	Landscape Sections	May 2018		C	Landscape Sections – Section A-A	May 2018		C	Landscape Sections – Section B-B	May 2018		C	Landscape Sections – Section C-C	May 2018		B	Materials Pavement	February 2018		B	Materials Pavement	February 2018		B	Detail Entry Forecourt	February 2018		B	Materials Entry Forecourt	February 2018		B	Detail Terraced Lawns	February 2018		B	Materials Terraced Lawns	February 2018		B	Detail Social Hub	February 2018		B	Materials Social Hub	February 2018		B	Detail Educational Trail	February 2018		B	Materials Educational Trail	February 2018		B	Details Agricultural & Environmental Learning	February 2018		B	Vision Natural Trail	February 2018		B	Softscape Planting Character	February 2018		B	Softscape Tree size specification & Formal Softscape Areas	February 2018 March 2019	SSD-SK	0002	Front entry – Landscaping and Security	27/07/2018		D E	Approach Design Tree Retention + Removal Strategy	October 2018 January 2019	Concept stormwater, sediment and erosion control plan prepared by Bonacci				Dwg No.	Rev	Name of Plan	Date	C030	P5	Concept Stormwater Management Plan	22/02/2018		P6		22/01/2019	C005	P2 AD	Concept Sediment and Erosion Control Plan	22/02/2018 22/01/2019	C007	P1 AB	Sediment and Erosion Control Details	09/02/2018 30/11/2018	C008	AB	Soil and Water Management Computations	30/11/2018			
Landscape Plans prepared by Arcadia Landscape Architecture																																																																																																																																			
Dwg No.	Rev	Name of Plan	Date																																																																																																																																
	B	Vision Landscape Masterplan	February 2018																																																																																																																																
	C	Cultural + Heritage Items	May 2018																																																																																																																																
	C	Landscape Sections	May 2018																																																																																																																																
	C	Landscape Sections – Section A-A	May 2018																																																																																																																																
	C	Landscape Sections – Section B-B	May 2018																																																																																																																																
	C	Landscape Sections – Section C-C	May 2018																																																																																																																																
	B	Materials Pavement	February 2018																																																																																																																																
	B	Materials Pavement	February 2018																																																																																																																																
	B	Detail Entry Forecourt	February 2018																																																																																																																																
	B	Materials Entry Forecourt	February 2018																																																																																																																																
	B	Detail Terraced Lawns	February 2018																																																																																																																																
	B	Materials Terraced Lawns	February 2018																																																																																																																																
	B	Detail Social Hub	February 2018																																																																																																																																
	B	Materials Social Hub	February 2018																																																																																																																																
	B	Detail Educational Trail	February 2018																																																																																																																																
	B	Materials Educational Trail	February 2018																																																																																																																																
	B	Details Agricultural & Environmental Learning	February 2018																																																																																																																																
	B	Vision Natural Trail	February 2018																																																																																																																																
	B	Softscape Planting Character	February 2018																																																																																																																																
	B	Softscape Tree size specification & Formal Softscape Areas	February 2018 March 2019																																																																																																																																
SSD-SK	0002	Front entry – Landscaping and Security	27/07/2018																																																																																																																																
	D E	Approach Design Tree Retention + Removal Strategy	October 2018 January 2019																																																																																																																																
Concept stormwater, sediment and erosion control plan prepared by Bonacci																																																																																																																																			
Dwg No.	Rev	Name of Plan	Date																																																																																																																																
C030	P5	Concept Stormwater Management Plan	22/02/2018																																																																																																																																
	P6		22/01/2019																																																																																																																																
C005	P2 AD	Concept Sediment and Erosion Control Plan	22/02/2018 22/01/2019																																																																																																																																
C007	P1 AB	Sediment and Erosion Control Details	09/02/2018 30/11/2018																																																																																																																																
C008	AB	Soil and Water Management Computations	30/11/2018																																																																																																																																

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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 02/06/20	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
Limits of Consent				
A5	This consent lapses five years after the date of consent unless the works associated with the development have physically commenced.	Notice of commencement under CoC B1 submitted 18/4/19 and again on 7/5/19.	Works commenced 10/5/19	Compliant
Prescribed Conditions				
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: <ul style="list-style-type: none"> - 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 adjoined to the Project). 	Compliant
Planning Secretary as Moderator				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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 02/06/20	<p>No disputes</p> <p>Observation from second audit: Council has raised parking and access issues on several occasions. 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&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.</p> <p>This remains open for the current audit period. Mace, SINSW and Council now have commenced fortnightly meetings to discuss project works. The Project advise that issues are being progressively worked through in a productive way and that Council's previous concerns are being managed. Sighted Meeting minutes 29/5/20.</p> <p>Refer to Section 3.6 regarding issues associated with Council. It is the Auditors opinion that further work by the Project is required to ensure that Council's expectations are managed.</p>	Not triggered
Long Service Levy				
A8	For work costing \$25,000 or more, a Long Service Levy must be paid. For further information please contact the Long Service Payments Corporation Helpline on 131 441	LSL receipt to Wollondilly Shire Council 3/9/18	LSL levy paid.	Compliant
Legal Notices				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
A9	Any advice or notice to the consent authority must be served on the Planning Secretary.	Interview with Auditees 02/06/20	No legal notices served.	Not triggered
Student Numbers				
A10	The student number is not to exceed 1,580 as referenced in the Environmental Impact Statement (V5) prepared by Ethos Urban dated 18 October 2018 and Traffic and Accessibility Impact Assessment prepared by TDG dated August 2018.	Interview with Auditees 02/06/20	Current expectation is less than 1580. Not relevant to current audit period	Not triggered
Evidence of Consultation				
A11	Where conditions of this consent require consultation with an identified party, the Applicant must: <ul style="list-style-type: none"> a) consult with the relevant party prior to submitting the subject document for information or approval; and b) provide details of the consultation undertaken including: <ul style="list-style-type: none"> i. the outcome of that consultation, matters resolved and unresolved; and ii. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved. 	Refer response to CoC B18 and B20 https://www.schoolinfrastructure.nsw.gov.au/projects/p/picton-high-school.html#category-project-updates	The Plans have been approved by the PCA, submitted to DPIE and being implemented on site. Refer to previous audit reports regarding consultation undertaken on the plans. Consultation through project updates is ongoing	Compliant
Staging, Combining and Updating Strategies, Plans or Programs				
A12	With the approval of the Planning Secretary, the Applicant may: <ul style="list-style-type: none"> a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development). 	DPIE 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:	As above.	The Project is implementing approved stages as per CoC A12.	Compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
	(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; (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); (c) specify how compliance with conditions will be achieved across and between each of the stages of the project; and (d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.		Further staging has yet to be proposed	
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 02/06/20. 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 02/06/20. Plans, programs and strategies evidenced elsewhere in this Audit Table	The documents prepared address all construction stages the works being undertaken.	Not triggered.
Demolition				
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

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
Structural Adequacy				
A16	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA and any additional requirements of the Subsidence Advisory NSW where the building or structure is located on land within a declared Mine Subsidence District. <i>Notes:</i> <ul style="list-style-type: none"> Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. Under section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of Subsidence Advisory NSW's approval before carrying out certain development in a Mine Subsidence District 	Interview with Auditees 02/06/20 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
External Walls and Cladding				
A17	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA	Interview with Auditees 02/06/20 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
Design and Construction for Bush Fire				
A18	The construction of entire science and mathematics wing, up to an internal fire rated wall must comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2009 <i>Construction of buildings in bushfire-prone areas</i> or NASH Standard (1.7.14 updated) <i>National Standard Steel Framed Construction in Bushfire Areas – 2014</i> as appropriate and section A3.7 Addendum Appendix 3 of <i>Planning for Bush Fire Protection 2006</i> .	Interview with Auditees 02/06/20 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
Applicability of Guidelines				
A20	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	The documents referred to elsewhere in this Audit Table	The documents prepared under the consent appear to refer to the standards and guidelines that are applicable to the document to which they relate.	Compliant
Monitoring and Environmental Audits				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
A21	<p>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.</p> <p><i>Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i></p>	<p>Part 9, Div 9.4 of the EPAA</p> <p>Acoustic Logic Noise monitoring report 20190515.3/0506A/RO/JM, and second report dated 25/10/19</p>	<p>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.</p> <p>The noise monitoring reports presents the information in accordance with these requirements.</p> <p>This Audit has been carried out with regard to these requirements.</p>	Compliant
Access to Information				
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"> ix. the documents referred to in condition A2 of this consent; x. all current statutory approvals for the development; xi. all approved strategies, plans and programs required under the conditions of this consent; xii. 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; xiii. 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; xiv. a summary of the current stage and progress of the development; xv. contact details to enquire about the development or to make a complaint; xvi. a complaints register, updated monthly; xvii. 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; xviii. any other matter required by the Planning Secretary; and <p>d) keep such information up to date, to the satisfaction of the Planning Secretary.</p>	<p>https://www.schoolinfrastructure.nsw.gov.au/projects/p/picton-high-school.html</p>	<p>Non-compliance: website does not contain the current version of the CEMP, CTPMSP, CNVMSP or CSWMSP, nor does it contain the current complaints register.</p>	Non-compliant
Compliance				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
A23	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development	<p>TBT 05/03/19 – 13/06/19 Demolition SWMS</p> <p>SE-F-11 Induction form and agenda.</p> <p>SE-F-20 additional induction items</p> <p>SMS bulletin 21/5/20 – 30/4/20</p> <p>Contractor selection criteria checklist</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> <p>SMS bulletins issued daily cover various compliance related issues, weather, environmental and community issues and safety. Induction support material includes environmental and compliance matters.</p> <p>666 x workers inducted to date. 109 x workers on site on the day of the audit.</p> <p>Contractor selection criteria checklist includes provision of Environmental Management Plans</p>	Compliant
ADVISORY NOTES				
AN1	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain , renew or comply with such licences, permits, approvals and consents.	ROL 201.2019.0000024.001	A road occupancy licence has been obtained for Wonga Rd.	Compliant
PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION				
Notification of Commencement				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B1	The Department must be notified in writing of the dates of commencement of physical work and operation at least 48 hours before those dates. If the construction or operation of the development is to be staged, the Department must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Notice of commencement under CoC B1 submitted 18/4/19 and again on 7/5/19.	Works commenced 10/5/19	Compliant
Certified Drawings				
B2	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with: <ul style="list-style-type: none"> a) the relevant clauses of the BCA; and b) this development consent. 	DPIE 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
External Walls and Cladding				
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.	DPIE 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
Landscaping				
B4	Prior to the commencement of construction, the Applicant must <ul style="list-style-type: none"> (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. 	DPIE 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 for previous audit	Audit findings and recommendations	Compliance status at previous audit
B5	The revised landscape plan must be submitted to the Planning Secretary and the Certifying Authority for information.	DPIE 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
Protection of Public Infrastructure				
B6	Before the commencement of construction, the Applicant must: <ul style="list-style-type: none"> a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and c) submit a copy of the dilapidation report to the Certifying Authority and Council. 	Dilapidation reports 190215 and 090314 Submission to Council and CA 190417 CC1 P217_007-2, 16/4/19	No service provider services impacted. Dilapidation reports undertaken and submitted to relevant stakeholders.	Compliant
Unexpected Contamination Procedure				
B7	Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition B15 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.	CEMP Appendix D Unexpected finds event 17/6/19	The unexpected finds procedure is included in the CEMP and is being implemented on site.	Compliant
Utilities and Services				
B8	Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Interview with Auditees 02/06/20 Sec73 permit for OSD TIR669118. Sydney Water approval to build over asset dated 21/4/20.	Sydney Water is the only service on the SSD requiring approval for works for connection and works over asset. Sighted both. 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 02/06/20 Site inspection 02/06/20	No above ground utility or service works have occurred during the audit period. Expected to occur in the next audit period.	Not triggered.
Community Communication Strategy				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B10	<p>A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication between the Applicant, Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction.</p> <p>The Community Communication Strategy must:</p> <ol style="list-style-type: none"> a) identify people to be consulted during the design and construction phases; b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; d) set out procedures and mechanisms: <ol style="list-style-type: none"> i. through which the community can discuss or provide feedback to the Applicant; ii. through which the Applicant will respond to enquiries or feedback from the community; and iii. to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation. <p>The Community Communication Strategy must be submitted to the Planning Secretary for approval no later than two weeks before the commencement of any work.</p> <p>Work for the purposes of the development must not commence until the Community Communication Strategy has been approved by the Planning Secretary, or within another timeframe agreed with the Planning Secretary.</p>	<p>Community Communication Strategy Picton High School redevelopment, April 2019</p> <p>DPIE Approval of Community Communications Strategy 05/04/19</p>	<p>The Strategy has been prepared in accordance with the condition and approved by DPIE.</p>	Compliant
Ecologically Sustainable Development				
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 (Rev 5) Ref 167053- ESD01</i> prepared by Northrop Consulting Engineers dated 13.03.2019 to achieve a minimum 4 Star Green Star rating.</p>	<p>DPIE 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
Outdoor Lighting				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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	DPIE 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
Access for People with Disabilities				
B13	The works that are the subject of this application must be designed and constructed to provide access and facilities for people with a disability in accordance with the BCA. Prior to the commencement of construction, the Certifying Authority must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.	DPIE 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
Environmental Management Plan Requirements				

B14	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> a. detailed baseline data; b. details of: <ul style="list-style-type: none"> (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; c. a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; d. a program to monitor and report on the: <ul style="list-style-type: none"> (i) impacts and environmental performance of the development; (ii) effectiveness of the management measures set out pursuant to paragraph (c) above; e. a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; f. a program to investigate and implement ways to improve the environmental performance of the development over time; g. a protocol for managing and reporting any: <ul style="list-style-type: none"> h. incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (iii) complaint; (iv) failure to comply with statutory requirements; and <ul style="list-style-type: none"> i. a protocol for periodic review of the plan. <p><i>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</i></p>	<p>SSD 8640 Environmental Impact Statement Ethos Urban, 04/04/18</p> <p>Construction Environmental Management Plan Picton High School, SMEC, 05/04/19 (CEMP)</p> <p>Unexpected finds protocol</p> <p>Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19 (CTPMSP)</p> <p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, 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>	Compliant
-----	---	--	---	-----------

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
		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"> a) Details of: <ul style="list-style-type: none"> i. hours of work; ii. 24-hour contact details of site manager; iii. management of dust and odour to protect the amenity of the neighbourhood; iv. stormwater control and discharge; v. measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; vi. groundwater management plan including measures to prevent groundwater contamination; vii. external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting; viii. community consultation and complaints handling; b) Construction Traffic and Pedestrian Management Sub-Plan (see condition B17); c) Construction Noise and Vibration Management Sub-Plan (see condition B18); d) Construction Waste Management Sub-Plan (see condition B19); e) Construction Soil and Water Management Sub-Plan (see condition B20); f) Aboriginal Cultural Heritage Management Sub-Plan (see condition B21); g) an unexpected finds protocol for contamination and associated communications procedure; h) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and i) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site 	<p>Construction Environmental Management Plan Picton High School, SMEC, 05/04/19 (CEMP), and updates 20/01/20 and 2/03/20.</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>The CEMP has been prepared and approved by the Certifying Authority.</p> <p>Refer to Independent Audit Report 1 and 2 regarding the adequacy of the plan.</p> <p>Refer to section 3.3 and the response to CoC C8 regarding the adequacy of the CEMP and the degree of implementation.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
		Bushfire assessment Picton High School Redevelopment, Peterson Bushfire, 16/5/18. (BfMP) Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSP)		
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.	CC1 P217_007-2, 16/4/19 Submission of CEMP to Planning Secretary 16/4/19 Submission of updated CEMP to Planning Secretary 10/03/20 and PCA on 12/06/20	The Certifying Authority approved the CEMP and it was submitted to DPIE on 16/4/19. Construction commenced 10/5/19.	Compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B17	<p>The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); b) be prepared in consultation with Council and RMS; c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; d) detail heavy vehicle routes, access and parking arrangements; e) include a Driver Code of Conduct to: <ul style="list-style-type: none"> i. minimise the impacts of earthworks and construction on the local and regional road network; ii. minimise conflicts with other road users; iii. minimise road traffic noise; and iv. ensure truck drivers use specified routes; f) a program to monitor the effectiveness of these measures; and g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes. 	<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) has been prepared and approved by the PCA.</p> <p>Refer to Independent Audit Report 1 and 2 regarding the adequacy of the plan.</p> <p>Observation from second audit: 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. Sighted CTPMSP 18/11/19 (Rev 7). Figure 3-4 of the plan has been amended to reflect the actual set up. Resolved.</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"> a) be prepared by a suitably qualified and experienced noise expert; b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; d) include strategies that have been developed with the community for managing high noise generating works; e) describe the community consultation undertaken to develop the strategies in condition B23(d); and f) include a complaints management system that would be implemented for the duration of the construction. 	<p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP)</p> <p>Acoustic Logic response to audit findings 12/07/19</p>	<p>The CNVMSP has been prepared and approved by the PCA.</p> <p>Refer to Independent Audit Report 1 and 2 regarding the adequacy of the plan.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B19	<p>The Construction Waste Management Sub-Plan (CWMSWP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; (b) removal of hazardous materials including asbestos, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works. 	<p>Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSWP)</p> <p>Project waste register</p> <p>ACM Blacktown Waste EPL11497, dial a dump EPL 13426, Wallan truck docketts and waste tracking forms 1/6/19, Genesis Eastern Creek tip docketts 1/6/19.</p>	<p>The CWMSWP has been prepared and approved by the PCA.</p> <p>Refer to Independent Audit Report 1 and 2 regarding the adequacy of the plan.</p>	Compliant
B20	<p>The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction; (c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (d) detail all off-Site flows from the Site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI) 	<p>Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP)</p>	<p>The CSWMSP has been prepared and approved by the PCA.</p> <p>Refer to Independent Audit Report 1 and 2 regarding the adequacy of the plan.</p>	Compliant
B21	<p>The Aboriginal Cultural Heritage Management Sub-Plan (ACHMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced expert in consultation with the Registered Aboriginal Parties; and (b) be submitted to the satisfaction of the Planning Secretary prior to construction of any part of the development. 	<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>CC2 P217_007-3, 15/7/19</p>	<p>The ACHMSP has been prepared and approved by the PCA.</p> <p>Refer to Independent Audit Report 1 and 2 regarding the adequacy of the plan.</p>	Compliant
Construction Parking				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B22	Prior to the commencement of construction, the Applicant must provide sufficient parking facilities for heavy vehicles on-site (unless alternative parking is agreed to in writing from the relevant road authority) and ensure that construction traffic associated with the development minimises on-street parking or the use of public parking facilities.	Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19, and V3 18/11/19 (CTPMSP) Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSP) Site inspection 02/06/20	The project contains sufficient space for HV parking and movements internal to the site.	Compliant
Road Design and Traffic Facilities				
B23	All roads and traffic facilities must be designed to meet the requirements of Council or RMS (whichever is applicable). The necessary permits and approvals from the relevant road authority must be obtained prior to the commencement of road or pavement construction works.	Interview with Auditees 02/06/20 Site inspection 02/06/20 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
Stormwater Management System				
B24	Prior to the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifying Authority. The system must: <ul style="list-style-type: none"> (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the EIS; (c) be in accordance with applicable Australian Standards; (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines; 	DPIE 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
Operational Noise- Design of Mechanical Plant and Equipment				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B25	Prior to commencement of construction, the Applicant must incorporate the noise mitigation recommendations in the <i>Acoustic Assessment Report Rev 1</i> 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 Rev 1</i> prepared by GHD dated April 2018 and Section 4.55 Acoustic Assessment report prepared by GHD dated January 2019.	DPIE 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
Biodiversity				
B26	Prior to any clearing or construction works, the Applicant must purchase and retire 10 ecosystem credits to offset the removal of native vegetation on site. The ecosystem credits must be determined in accordance with the OEH's <i>Framework for Biodiversity Assessment (FBA)</i> and the <i>Biobanking Assessment Methodology 2014 (BBAM)</i> . Note: <i>If the Applicant seeks a variation to the offset rules, the Applicant must demonstrate that reasonable steps have been taken to find like-for-like offsets in accordance with Section 10.5.4.2 of the FBA and Appendix A of the OEH's NSW Biodiversity Offsets Policy for Major Projects 2014</i>	Interview with Auditees 02/06/20 Ecosystem credit application 06/05/19 Statement of reasonable equivalence DOC19/825383-2 Ecosystem credit application 21/11/19.	The Project submitted the application to submit into the Biodiversity Conservation Fund on 06/05/19. On 13/05/19 the OEH responded to advise that they required a statement of reasonable equivalence and resubmission (due to the implementation of the new OEH offsetting process). The statement of reasonable equivalence was completed in October. The updated application was lodged to the BCF 21/11/19. BCF trust tax invoice indicates that the ecosystem credits have been retired 18/12/19. This is resolved.	Compliant
Construction and Demolition Waste Management				
B27	The Applicant must notify the RMS Traffic Management Centre of the truck route(s) to be followed by trucks transporting waste material from the site, prior to the commencement of the removal of any waste material from the site.	Correspondence to RMS 20/03/19 and from RMS to TMC 25/03/19	Notification occurred prior to commencement of works.	Compliant
Operational Waste Storage and Processing				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B28	Prior to the commencement of construction, the Applicant must obtain agreement from Council for the design of the operational waste storage area where waste removal is undertaken by Council.	DPIE approval of staging report 7/5/19. Staging report 18/4/19 Correspondence from Council on operational waste management plan 22/3/19	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.	Compliant
Mechanical Ventilation				
B29	All mechanical ventilation systems must be designed in accordance with Part F4.5 of the BCA and must comply with the AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and AS/NZS 3666.1:2011 Air handling and water systems of buildings- Microbial control to ensure adequate levels of health and amenity to the occupants of the building and to ensure environment protection. Details must be submitted to the satisfaction of the Certifying Authority prior to the commencement of construction.	DPIE 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	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	Compliant
Rainwater Harvesting				
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.	DPIE 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
Roadworks and Access				
B31	Prior to the commencement of construction, the Applicant must submit design plans to the satisfaction of the Certifying Authority which demonstrates that the proposed internal roads comply with section 4.2.7 of <i>Planning for Bush Fire Protection 2006</i> .	DPIE 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

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B32	<p>Prior to the commencement of construction, the Applicant must prepare plans in consultation with Council to include:</p> <p>(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;</p> <p>(b) signage and line-markings for the proposed changes to the Argyle Street kerb-side parking restrictions; and</p> <p>(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.</p>	<p>DPIE approval of staging report 7/5/19.</p> <p>Staging report 18/4/19</p> <p>DPIE letter of approval of plans for Argyle Street and Wonga Road, 23/8/19</p> <p>Swept Path analysis 29/3/19</p> <p>Leap frog analysis 5/4/19</p> <p>Sign post plan, May 2019</p> <p>Wonga Road Sign Post, Oct 2018.</p>	<p>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.</p>	Compliant
B33	<p>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.</p>	<p>DPIE approval of staging report 7/5/19.</p> <p>Staging report 18/4/19</p> <p>Road Safety Evaluation Report, TTP, 5/6/19.</p> <p>Submission to DPIE 5/7/19</p>	<p>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.</p>	Compliant
Car Parking and Service Vehicle Layout				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B34	Compliance with the following requirements must be submitted to the satisfaction of the Planning Secretary prior to the commencement of construction: <ul style="list-style-type: none"> (a) all vehicles must enter and leave the Site in a forward direction; (b) minimum of 141 on-site car parking spaces (including 4 accessible parking spaces) for use during operation of the development and designed in accordance with the latest version of AS2890.1 (c) the swept path of the longest vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the Site, must be in accordance with AUSTROADS; (d) amended plans demonstrating the swept path of the waste collection vehicle and the manoeuvrability through the Site, must be designed in accordance with AS2890.1 – 2004 and AS20890.2 – 2002; and (e) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed 	DPIE approval of staging report 7/5/19. Staging report 18/4/19 DPI Letter of approval 5/9/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. DPIE approved the car parking and service layout	Compliant
Bicycle Parking and End-of-Trip Facilities				
B35	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: <ul style="list-style-type: none"> a. the provision of a minimum 27 bicycle parking spaces; b. the provision of 4 motorcycle parking spaces; c. the layout, design and security of bicycle facilities must comply with the minimum requirements of AS 2890.3:2015 <i>Parking facilities - Bicycle parking</i>, and be located in easy to access, well-lit areas that incorporate passive surveillance; d. the provision of end-of-trip facilities for staff in accordance with the ESD Design & As Built rating tool; e. appropriate pedestrian and cyclist advisory signs are to be provided; and f. all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority. 	DPIE 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	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.	Compliant
Public Domain Works				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B36	Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifying Authority that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from Council to the Certifying Authority.	Interview with Auditees 02/06/20 Site inspection 02/06/20 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	Sighted design and consultation records for Wonga Road works. Non-compliance from the first audit: There was no evidence at the time of the audit that the streetscape design and treatment had been to the CAs satisfaction. This was resolved at the second audit.	Compliant
Compliance Reporting				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
B37	<p>No later than two weeks before the date notified for the commencement of construction, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.</p> <p>Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018).</p> <p>The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the Certifying Authority in writing at least seven days before this is done.</p>	<p>Compliance program 09/04/19 and submission correspondence 16/04/19</p> <p>Preconstruction Compliance report 24/04/19</p> <p>Interview with Auditees 02/06/20</p> <p>Construction Compliance Report 1 17/10/19.</p> <p>Notification of submission and publication of CCR1 to Planning Secretary 7/05/20 and PCA 12/06/20.</p> <p>Construction Compliance Report 2 24/4/20</p> <p>Construction Compliance Report 2 SINSW submission to DPIE 25/5/20</p> <p>CCR2 submitted to PCA and notified of publication within 60 days on 11/06/20</p>	<p>The program was submitted >2 weeks prior to construction. The PCCR was submitted prior to construction.</p> <p>Non-compliance: Construction Compliance Report 1 is not available on the website. Construction Compliance Report 2 was not submitted to the PCA until 11/06/20, after the deadline required by the condition.</p>	Non-compliant
B38	<p>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</p>	Site inspection 02/06/20	The project is in construction	Not triggered
Sydney Water Approval				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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.	<p>DPIE approval of staging report 7/5/19.</p> <p>Staging report 18/4/19</p> <p>Interview with Auditees 02/06/20</p> <p>Sec73 permit for OSD TIR669118.</p> <p>Sydney Water approval to build over asset dated 21/4/20.</p>	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. Approval obtained for tap in and for working over Sydney Water asset. No external services affected.	Compliant
PART C DURING CONSTRUCTION				
Approved Plans to be On-site				
C1	A copy of the approved and certified plans, specifications and documents incorporating conditions of approval and certification must be kept on the Site at all times and must be readily available for perusal by any officer of the Department, Council or the Certifying Authority.	<p>Site inspection 02/06/20</p> <p>Interview with Auditees 02/06/20</p>	All certified plans and documents were readily available on site. Aconex used for storage of documentation.	Compliant
Site Notice				
C2	<p>A site notice(s):</p> <p>(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.</p> <p>(b) is to satisfy all but not be limited to, the following requirements:</p> <ol style="list-style-type: none"> i. minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size; ii. the notice is to be durable and weatherproof and is to be displayed throughout the works period; iii. the approved hours of work, the name of the site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and iv. the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the site is not permitted. 	<p>Site inspection 02/06/20</p>	Sighted site notices. They satisfied the requirements of this condition	Compliant
Operation of Plant and Equipment				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
C3	All plant and equipment used on site, or to monitor the performance of the development must be: <ul style="list-style-type: none"> (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner 	Mobile plant inspection checklists JCB 541-70 including risk assessments and service records Driver induction records including licence and ticket check. Plant prestart checklists 52, 46, 44, 4931. Hammertech equipment induction system. SWMS Rubbish Chutes (May20), traffic control (Apr20), hoist (Mar20), concrete pour (Feb20), crushing material (Jan20).	A plant onboarding process is being implemented. The process includes check of maintenance records which must be <3 months old. All plant operators' licenses are checked to ensure they are competent. Hammertech includes plant risk assessment records, service / maintenance records and log books, operator tickets and signage. Approx two dozen plant on site in the register. System looks up to date. SWMS are prepared and maintained on system. They identify methods and risks (including environmental where relevant) and controls, relevant codes, sign on and authorisation.	Compliant
Demolition				
C4	Demolition work must comply with Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifying Authority before the commencement of works.	Demolition SWMS 6767 Demolition sequence 181019 Wala demolition works plan 08/04/19 Tree removal plans 190404 AA020001 CC1 P217_007-2, 16/4/19	The wala demolition works plan are prepared by the demolition contractor WHS Manager details compliance with AS2601. It is complemented by work method statements. CC1 issued by CA 16/04/19.	Compliant
Construction Hours				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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"> (a) between 7:00 am and 6:00 pm, Mondays to Fridays inclusive; and (b) between 8:00 am and 1:00 pm, Saturdays. <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)</p> <p>Present in subcontracts.</p> <p>Present in the SE-F-20 induction forms</p> <p>TBT 16/06/19, 25/11/19,</p> <p>Weekly subcontractor meeting 25/5/20, 18/5/20, 01/4/20, 16/3/20, 09/3/20.</p>	<p>The hours are regularly communicated to personnel and are present in project documentation.</p> <p>Weekly subcontract meeting minutes includes storage of fuels, labelling, noise control, hours of work, subcontractor parking.</p>	Compliant
C6	<p>Activities may be undertaken outside of the hours in condition C5 if required:</p> <ul style="list-style-type: none"> (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or (c) where the works are inaudible at the nearest sensitive receivers; or (d) where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works. <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 02/06/20</p> <p>SINSW notice for OOHW 03/06/20</p> <p>NHV Permit 03/06/20</p>	<p>No out of hours works have occurred.</p> <p>One event is scheduled for 3/6/20 for NVR Class 1 oversize delivery (OSOM delivery).</p>	Compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
C7	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: <ul style="list-style-type: none"> (a) 9 am to 12 pm, Monday to Friday; (b) 2 pm to 5 pm Monday to Friday; and (c) 9 am to 12 pm, Saturday. 	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP) TBT 16/06/19 and 06/06/19. Present in the SE-F-20 induction forms Weekly subcontractor meeting 25/5/20, 18/5/20, 01/4/20, 16/3/20, 09/3/20. Site inspection 02/06/20	The intra-day respite periods have been communicated to personnel and are present in project documentation. No high impact noise activities have been undertaken. Weekly subcontract meeting minutes includes storage of fuels, labelling, noise control, hours of work, subcontractor parking.	Compliant
Implementation of Management Plans				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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).	<p>Documents referred to elsewhere in this Audit Table</p> <p>Site inspection 02/06/20</p> <p>CEMP, 5/4/19, (inc Taylor PEMP, E-PLAN-03 (Rev. April 2019)) and updates 20/01/20 and 02/03/20</p> <p>HSE inspection checklists 12/02/2020 x 2; 22/04/2020; 13/05/2020; 3/6/2020; 10/06/2020;</p> <p>WHS project inspection reports- post rain- 27/01/20; 03/02/20; 06/02/20; 10/02/20; 02/04/20</p> <p>Taylor site induction checklist</p> <p>Taylor Environment Management Project Audit Report dated 21/05/2020</p> <p>Taylor Traffic Control Plan – stage 3 round about works May 2019</p> <p>D1 Welcome pack – communicating access arrangements as per CTPMSP.</p> <p>Taylor sever weather warning alert 21/05/20</p>	Pursuant to previous findings regarding implementation of the Taylor PEMP instead of the approved CEMP all elements checked were being implemented as per the approved CEMP.	Compliant
Construction Traffic				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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.	<p>Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19, and V3 18/11/19 (CTPMSP)</p> <p>Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMSPP)</p> <p>Site inspection 02/06/20</p>	The project contains sufficient space for HV parking and movements internal to the site. The access gate is manned to allow vehicles to enter the site without extended stopping.	Compliant
Road Occupancy Licence				
C10	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	<p>ROL 201.2019.00000024.001 for Wonga Rd</p> <p>TCP Wonga Road 30/05/19</p> <p>Interview with Auditees 02/06/20</p>	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
SafeWork Requirements				

C11	<p>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.</p>	<p>Interview with Auditees 02/06/20</p> <p>Site inspection 02/06/20</p> <p>TBT records 07/03/19 – 18/06/19</p> <p>TBT records July – November 19</p> <p>Weekly subcontractor meeting 25/5/20, 18/5/20, 01/4/20, 16/3/20, 09/3/20.</p> <p>SWMS Rubbish Chutes (May20), traffic control (Apr20), hoist (Mar20), concrete pour (Feb20), crushing material (Jan20).</p> <p>SafeWork inspection 17/3/20, 17/2/20 and 13/11/19, 10/12/19</p> <p>Notice of intent to remove asbestos 17/5/19 – 2/10/23</p> <p>EPL 20693 (Walan Licence for transport of trackable waste)</p> <p>Air Monitoring Greencap 9/3/20</p> <p>Tip dockets 7/3/20 to Bingo Genesis at Eastern Creek.</p> <p>Asbestos clearance certificates C120714 9/3/20.</p> <p>Mark up for hazardous materials map</p>	<p>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. SWMS are prepared and maintained on system. They identify methods and risks (including environmental where relevant) and controls, relevant codes, sign on and authorisation. SafeWork inspection 17/3/20, 17/2/20 identified asbestos works and need to schedule the works during less sensitive periods. To the auditors knowledge there was no formal notice or follow up requirement. SafeWork inspection 13/11/19 identified dust issues and need for application of water and control of excavations. To the auditors knowledge there was no formal notice or follow up requirement. SafeWork inspection 10/12/19 identified complaint. To the auditors knowledge there was no formal notice or follow up requirement. Sighted notice to SafeWork of intent to remove asbestos. It is current through to 2023. Sighted Walan contractors EPL that permits the transport of trackable waste (asbestos). Tip dockets indicate disposal to licenced premises lawfully permitted to receive the waste (Genesis Eastern Creek). The unexpected finds register indicates that hazardous materials are identified and recorded through to removal.</p>	Compliant
-----	---	--	--	-----------

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
		Unexpected finds delays register		
Hoarding Requirements				
C12	The following hoarding requirements must be complied with: <ul style="list-style-type: none"> (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 02/06/20	No hoarding on third party property. No b class hoarding required. Hoarding was free of advertising and graffiti.	Compliant
No Obstruction of Public Way				
C13	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under and circumstances. Non-compliance with this requirement will result in the issue of a notice by the relevant Authority to stop all works on site.	TBT 14/03/19, 05/03/19 TBT July – November 2019 Site inspection 02/06/20	There were no obstructions to public access observed. The need to maintain access is communicated to workforce.	Compliant
Construction Noise Limits				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
C14	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.	<p>Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP)</p> <p>TBT 21/03/19, 18/06/19, 22/05/19, 16/06/19 and 06/06/19</p> <p>'Traffic light' report 17/06/19 and 06/06/19, 21/10/19, 25/11/19</p> <p>Acoustic Logic noise monitoring report 05/06/19 and 25/10/19</p> <p>Hours of works present in the SE-F-20 induction forms for all staff.</p> <p>Site inspection 02/06/20</p> <p>'Traffic light' report 9/12/19, 23/3/20, 2/12/19.</p> <p>Weekly subcontractor meeting 25/5/20, 18/5/20, 01/4/20, 16/3/20, 09/3/20.</p>	<p>The need to minimise noise impacts is identified in Project documentation and is communicated to the workforce. The Project also produces a 'traffic light' report which identifies upcoming construction works and the potential noise impacts. Note that this is prepared on the basis of the team experience with construction, rather than using any predictive modelling. The report is provided to the temporary school to enable consultation on any clashes with important classes etc. The traffic light reports are prepared weekly for the Picton School meetings. Monitoring from within the temporary school does not show excessive noise levels. Hoarding is in place. Scissor lifts are electrical power (not diesel). Crane generator is at base (rather than elevated). Signage on site directs people to respect neighbours. Non-tonal beepers are fitted to some long-term plant (where safe to do so). No noise issues have been raised by the school that has required special noise mitigation. Weekly subcontract meeting minutes includes storage of fuels, labelling, noise control, hours of work, subcontractor parking.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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.	<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>TBT 16/06/19</p> <p>Hours of works present in the SE-F-20 induction forms for all staff.</p> <p>Weekly subcontractor meeting 25/5/20, 18/5/20, 01/4/20, 16/3/20, 09/3/20.</p> <p>SINSW notice to contractors 28/5/20</p>	<p>The hours are regularly communicated to personnel and are present in project documentation.</p> <p>Weekly subcontract meeting minutes includes storage of fuels, labelling, noise control, hours of work, subcontractor parking.</p> <p>SINSW have provided instructions to all contractors about managing noise during rescheduled HSC.</p>	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	<p>Interview with Auditees 02/06/20</p> <p>Site inspection 02/06/20</p>	Non-tonal beepers are fitted to long term plant.	Compliant
C17	Any noise generated during construction of the development must not be offensive noise within the meaning of the Protection of the Environment Operations Act 1997 or exceed approved noise limits for the site.	Refer response to CoC C14	Refer response to CoC C14	Compliant
Vibration Criteria				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
C18	Vibration caused by construction at any residence or structure outside the site must be limited to: <ul style="list-style-type: none"> (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time). 	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP) Vibration monitoring reports 1 and 2 03/06/19 and 21/08/19. Site inspection 02/06/20 Interview with Auditees 02/06/20	The CNVMSP identifies the relevant criteria in Section 5.2. Section 9 identifies a process by which deviations from the applicable criteria are to be managed. Refer response to CoC B18 regarding the adequacy of the guidance presented in Section 9 of the CNVMSP. Observation from second audit: 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). Douglas Partners prepared an updated report 6/1/20 for vibration monitoring undertaken. It includes a statement about human comfort. No exceedances were recorded. No vibration intensive work has occurred during the audit period.	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	Vibration monitoring reports 1 and 2 03/06/19 and 21/08/19 Site inspection 02/06/20 Interview with Auditees 02/06/20	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. No vibration intensive work has occurred during the audit period, including none within 30 metres of residences.	Not triggered

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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.	<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>Vibration monitoring reports 1 and 2 03/06/19 and 21/08/19</p> <p>Acoustic Logic noise monitoring report 05/06/19 and 25/10/19</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.	Compliant
Detailed Site Investigation				
C21	<p>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:</p> <ol style="list-style-type: none"> NSW EPA Sampling Design Guidelines; Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017; Guidelines for Consultants Reporting on Contamination Sites, 2011; and The National Environment Protection (Assessment of Contamination) Measure. 	<p>Site inspection 02/06/20</p> <p>Report on building footprint contamination investigation, Douglas Partners, 22/11/19</p> <p>Douglas Partners in situ waste classification report 21/1/19 and 25/7/19.</p>	<p>A Detailed Site Investigation was carried out across the site. This was coupled with an in-situ waste classification report. The Detailed Site Investigation concluded that with the excavations completed in preparation for works th site is suitable for its intended use as a school.</p> <p>Refer to CoC D33 regarding the need or relevance of that condition.</p>	Compliant
Tree Protection				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
C22	<p>For the duration of the construction works:</p> <ul style="list-style-type: none"> (a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; (b) all street trees must be protected at all times during construction. Any tree on the footpath, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council; (c) all trees on the site 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 (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. 	<p>Arborist inspection report 15/7/19 and 16/10/19</p> <p>Arborist site inspection 8/11/19</p> <p>Site inspection 02/06/20</p> <p>Photo series 0493 – 0495 and TPZ calculations 29/06/20</p>	<p>No street trees had been pruned or removed.</p> <p>Tree Protection Zones are in place.</p>	Compliant
Dust Minimisation				
C23	<p>The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.</p>	<p>Site inspection 02/06/20</p> <p>TBT 03/06/19, 25/05/19, 22/05/19, 28/05/19</p> <p>TBT July – November 19.</p> <p>SE-F-20 induction forms for all staff.</p> <p>SafeWork inspection 13/11/19</p> <p>Client corro Mace to Taylor 18/12/19</p> <p>Action item for civil contractors 9/12/19</p>	<p>Dust risk and control is communicated to project personnel.</p> <p>The Project has set up a boundary misting system and portable gervi to suppress fugitive dust as required. Trailer with IBC full of water for application as required.</p> <p>SafeWork inspection 13/11/19 identified dust issues and need for application of water and control of excavations. To the auditor's knowledge there was no formal notice or follow up requirement.</p> <p>No issues observed.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
C24	<p>During construction, the Applicant must ensure that:</p> <ul style="list-style-type: none"> (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces. 	<p>Site inspection 02/06/20</p> <p>TBT 03/06/19, 25/05/19, 22/05/19, 28/05/19</p> <p>TBT July – November 19</p> <p>SafeWork inspection 13/11/19</p> <p>Client corro Mace to Taylor 18/12/19</p> <p>Action item for civil contractors 9/12/19</p> <p>Inspection</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. Trailer with IBC full of water for application as required</p> <p>Site access and egress is sealed and includes a rumble grid. No material issues observed.</p>	Compliant
Air Quality Discharges				
C25	The Applicant must install and operate equipment in line with best practice to ensure that the development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	-	The Project does not hold an EPL	Not triggered
Erosion and Sediment Control				
C26	All erosion and sediment control measures, must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment.	<p>Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP)</p> <p>TBT 07/03/19</p> <p>Site inspection 02/06/20</p> <p>Project ERSED Plan May 2020</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 ERSED controls has been communicated to Project personnel.</p>	Compliant
Imported Soil				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
C27	The Applicant must: <ul style="list-style-type: none"> (a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Certifying Authority upon request. 	Interview with Auditees 02/06/20 Site inspection 02/06/20 VENM certificate, Douglas partners 16/10/19 EPA exemption order Rozelle Interchange ADE tunnel spoil classification report 10/3/20	The project has imported tunnel spoil from the Rozelle Interchange project. Certificates and EPA approval was presented.	Compliant
Disposal of Seepage and Stormwater				
C28	Any seepage or rainwater collected on-site during construction or groundwater must not be pumped to the street stormwater system unless separate prior approval is given in writing by the EPA in accordance with the Protection of the Environment Operations Act 1997.	Site inspection 02/06/20 Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP) Interview with Auditees 02/06/20.	The Project has not needed to pump water offsite. The ERSED controls in the ERSED plan are passive.	Not triggered
Unexpected Finds Protocol- Aboriginal Heritage				
C29	In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by OEH and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and OEH to develop and implement management strategies for all objects/sites. Works shall only recommence with the written approval of OEH.	Site inspection 02/06/20 Interview with Auditees 02/06/20	There were no unexpected finds reported during the audit period.	Not triggered.
Unexpected Finds Protocol- Historic Heritage				
C30	If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and the OEH Heritage Division contacted. Depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area. Works may only recommence with the written approval of Heritage Division of the OEH.	Site inspection 02/06/20 Interview with Auditees 02/06/20	There were no unexpected finds reported during the audit period.	Not triggered.

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
Waste Storage and Processing				
C31	Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	Site inspection 02/06/20 Email from Council 2/6/20 Interview with council 4/6/20	Waste is segregated and stored in skip bins. Non-compliance: Spoil from the Wonga Road works was stockpiled outside of the project site to enable bus turning trials at the roundabout. The stockpiles were placed within a portion of the road reserve owned and managed by Council. Council had agreed to this occurring and the stockpiles were promptly removed from the area once bus turning tests were complete. The auditor also notes that tree protection zones were not installed.	Non-compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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).	<p>Waste Management Plan Picton High School Redevelopment, SMEC, 27/2/19 (CWMS)</p> <p>Interview with Auditees 02/06/20</p> <p>Site inspection 02/06/20</p> <p>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.</p> <p>Picton sand and soil quarry concrete waste tipping 4/5/20 – 22/5/20.</p> <p>Dump It recycling centre report April 2020.</p> <p>Atlas Waste Classification Report E10194-1, E10194-2, E10194-3,</p>	<p>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.</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.</p> <p>Monthly Dump It report identifies material type, volumes, disposal destination (including EPL) numbers. All material is pre-classified under the Waste Classification Guidelines.</p> <p>Waste classification report for Wonga Road excavation indicate the material is ENM and GSW.</p>	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.	<p>Site inspection 02/06/20</p> <p>Site photos prepared for CCR1 by contractor</p>	<p>Sighted a waste transporter load up material and install covers before leaving site.</p> <p>Adequate space is available for waste and other HV movements and parking on site. Refer response to CoC C24.</p> <p>Trucks are fitted with automatic covers. Site access gate has rock and rumble grid in place, plus wheel washdown as required.</p> <p>No issues.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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 02/06/20	There is a washout tray on site for use – once cured the concrete is disposed of off-site. Excess concrete is stockpiled in preparation for load out and recycling at Picton Sands.	Compliant
Handling of Asbestos				
C35	The Applicant is to consult with SafeWork NSW concerning the handling of any asbestos waste that may be encountered during construction. The requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7-Transportation and management of asbestos waste' must also be complied with.	ATS notice to SafeWork of removal of friable and non-friable asbestos 06/04/19 – 04/06/20 ATS WHS Plan 05/04/19 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
Incident Notification, Reporting and Response				
C36	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 1. <i>Note: Appendix 1 as provided in SSD 8640 Development Consent</i>	Interview with Auditees 02/06/20 Incident Register 24/10/19 – current	No notifiable incidents or non-compliances have been identified by the Project.	Not triggered
Non-Compliance Notification				
C37	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Department in writing to compliance@planning.nsw.gov.au within seven days after they identify any non-compliance. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it 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 02/06/20	No incidents or non-compliances have been identified by the Project other than those identified through the independent audits.	Not triggered

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
Independent Environmental Audit				
C38	Proposed independent Auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an Independent Audit Program or commencement of an Independent Audit	DPIE approval of Auditors, 03/05/19	The Auditors were approved prior to the development of the Audit Program and the Independent Audit	Compliant
C39	No later than four weeks after the date notified for the commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifying Authority.	Independent Audit Program, WolfPeak 27/05/19 Submission of Program to DPIE, 25/06/19	Non-compliance from previous audit: the Audit Program was not submitted until 25/06/19, approximately 6 weeks after commencement of construction. This is now closed.	Compliant
C40	Table 1 of the Independent Audit Post Approval Requirements (Department 2018) is amended so that the frequency of audits required in the construction phase is: (a) an initial construction Independent Audit must be undertaken within 8 weeks of the notified commencement date of construction; and (b) a subsequent Independent Audit of construction must be undertaken no later than 6 months from the date of the initial construction Independent Audit.	Independent Audit Program, WolfPeak 27/05/19 This audit	The audit frequencies presented in the Audit Schedule (within the Program) reflect this requirement	Compliant
C41	Independent Audits of the development must be carried out in accordance with: (a) the Independent Audit Program submitted to the Department and the Certifying Authority under condition C38 of this consent; and (b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).	This audit 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: (a) review and respond to each Independent Audit Report prepared under condition C41 of this consent; (b) submit the response to the Department and the Certifying Authority; and (c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Department and notify the Department and the Certifying Authority in writing at least seven days before this is done.	https://www.schoolinfrastructure.nsw.gov.au/projects/p/picton-high-school.html Notification 5/9/19 regarding publication of IA1t 12/7/19 submission of Picton response to IA1 12/07/19 submission of IA1 09/01/20 submission of IA 2 to DPIE.	DPIE and CA were provided with copies of the response to the audit report findings. (per C42(b)) DPIE and CA were notified of Picton's intent to publish the second Audit report on the Project website. IA2 on the Project Website. SINSW requested an extension to the submission of its response to the second Independent Audit (in accordance with the IAPAR) until 30/03/20. DPIE granted that extension and the response was provided on 30/03/20.	Compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
		30/03/20 submission of Picton Response to IA2 and notification of publication to DPIE 12/06/20 submission of Picton response to IA2 and notification of publication to PCA		
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 construction.	Works are in construction.	Not triggered.
Revision of Strategies, Plans and Programs				
C44	Within three months of: <ul style="list-style-type: none"> (a) the submission of a compliance report under condition B37; (b) the submission of an incident report under condition C36; (c) the submission of an Independent Audit under condition C40; (d) the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Department and the Certifying Authority must be notified in writing that a review is being carried out.	Interview with Auditees 02/06/20 Pre-construction Compliance report 24/04/19 Picton High Statutory Planning update 13/06/19 IA1 submitted 12/07/19 (review due by 12/10/19) IA2 submitted 30/03/20 (review due by 30/06/20) CCR1 submitted 7/05/20 (completed 17/10/19- see CoC B37) (review by 07/08/20) CCR2 submitted 25/05/20 (review by 25/08/20) Revision dates on updated plans	Non-compliance from second audit: The first review was required 3 months from the submission of the Pre-construction Compliance Report, (being 24/07/19) and IA1 (being 12/07/19). There is no evidence to show that a review was conducted within the requisite timeframes, or that the stakeholders were notified of that review. Recent review conducted 2/3/20 which was within 3 months from IA2. Non-compliance: the review following IA2 (which occurred and was notified to the Department in March 2020) was not notified to the PCA until 12/06/20.	Non-compliant

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
		CEMP revision change table 12/06/20 notification to PCA advising of revision of the CEMP and plans following IA2 10/03/20 submission of revised CEMP to Planning Secretary		
C45	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Certifying Authority. Where revisions are required, the revised document must be submitted to the Certifying Authority for approval within six weeks of the review. <i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development</i>	Interview with Auditees 02/06/20 Construction Environmental Management Plan Picton High School, SMEC, 5 April 2019 and updates 20/01/20 and 02/03/20 Submission of updated CEMP to the Department 11/03/20. Submission of updated CEMP to PCA 12/06/20	Non-compliance: the CEMP and sub-plans were last updated on 02/03/20. A copy was not provided to the PCA until 12/06/20, which is beyond the 6 weeks required by this condition.	Non-compliant
Archaeological Work Method Statement				
C46	An Archaeological Work Method Statement for the works on the alignment of the Hume Highway (Argyle Street) is to be prepared by a qualified archaeologist and be in place at the site for the duration of excavation works.	Interview with Auditees 02/06/20 Site inspection 02/06/20 AMAC work method statement 10/3/19	Works along the Hume Highway (Argyle Street) had not commenced at the time of the audit. The work method statement has been prepared and is ready for implementation once the works commence.	Not triggered
PART D PRIOR TO OCCUPATION OR COMMENCEMENT OF USE				
Notification of Occupation				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
D1	The date of commencement of the occupation of the development must be notified to the Department in writing, at least one month before occupation. If the operation of the development is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.		The Project only recently commenced construction	Not triggered
External Walls and Cladding				
D2	Prior to the occupation of the building, the Applicant must provide the Certifying Authority with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.		The Project only recently commenced construction	Not triggered
D3	The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it		The Project only recently commenced construction	Not triggered
Protection of Public Infrastructure				
D4	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> e. repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and f. relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development. <p>Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions required by D9 of this consent.</p>		The Project only recently commenced construction	Not triggered
Post-construction Dilapidation Report				
D5	<p>Prior to occupation of the building, the Applicant must engage a suitably qualified person to prepare a post-construction dilapidation report at the completion of construction. This report is:</p> <ul style="list-style-type: none"> (a) to ascertain whether the construction created any structural damage to adjoining buildings or infrastructure. (b) to be submitted to the Certifying Authority. In ascertaining whether adverse structural damage has occurred to adjoining buildings or infrastructure, the Certifying Authority must: <ul style="list-style-type: none"> i. compare the post-construction dilapidation report with the pre-construction dilapidation report required by these conditions; and ii. have written confirmation from the relevant authority that there is no adverse structural damage to their infrastructure and roads. (c) to be forwarded to Council. 		The Project only recently commenced construction	Not triggered
Dedication of Public Road				
D6	The Wonga Road extension including roundabout and associated land on approved plans (Site Context Plan prepared by Billard Leece Partnership dated 30.08.2018) must be dedicated to Wollondilly Shire Council as a 'public road' at no cost to Council.		The Project only recently commenced construction	Not triggered
Roadworks and Access				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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
Works as Executed Plans				
D9	Prior to occupation of the building, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifying Authority.		The Project only recently commenced construction	Not triggered
Utilities and Services				
D10	Prior to occupation of the building, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the <i>Sydney Water Act 1994</i> .		The Project only recently commenced construction	Not triggered
Road Safety Evaluation				
D11	Any recommendations of the RSE as required by condition B33, must be implemented on all relevant sections of Argyle Street and Wonga Road utilised for bus and private vehicle drop-off and pick-up.		The Project only recently commenced construction	Not triggered
Green Travel Plan				
D12	<p>Prior to the commencement of operation, a Green Travel Plan (GTP), must be prepared and be submitted to the Secretary to promote the use of active and sustainable transport modes. The plan must:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified traffic consultant in consultation with Council and Transport for NSW; 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; c) include specific tools and actions to help achieve the objectives and mode share targets; 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 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. 		The Project only recently commenced construction	Not triggered
Operational Transport and Access Management Plan				
D13	<p>An OTAMP is to be prepared for the school (or separately for each school) by a suitably qualified person, in consultation with Council, Transport for NSW and RMS, to the satisfaction of the Secretary, and must address the following:</p> <ul style="list-style-type: none"> a) Detailed pedestrian analysis including the identification of safe route options- to identify the need for management measures such as staggered school start and finish times to 		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
	<p>ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish;</p> <p>b) the location of all car parking spaces on the school campuses and their allocation (i.e. staff, visitor, accessible, emergency, etc.);</p> <p>c) the location and operational management procedures of the pick-up and drop-off parking, including staff management/traffic controller arrangements;</p> <p>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;</p> <p>e) delivery and services vehicle and bus access and management arrangements;</p> <p>f) management of approved access arrangements;</p> <p>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;</p> <p>h) car parking arrangements and management associated with the proposed use of school facilities by community members; and</p> <p>i) a monitoring and review program.</p> <p>The OTAMP(s) must be submitted to the Secretary for approval prior to operation of the development.</p> <p>The OTAMP(s) (as revised from time to time) must be implemented by the Applicant for the life of the development</p>			
Evacuation and Emergency Management Plan				
D14	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.		The Project only recently commenced construction	Not triggered
School Zones				
D15	Installation of all required School Zone signage, speed management signage and associated pavement markings is to be completed prior to commencement of occupation of the development. <i>Note: Any required approvals for altering public road speed limits, design and signage are required to be obtained from the relevant consent authority.</i>		The Project only recently commenced construction	Not triggered
D16	Following installation of School Zone signage, speed management signage and associated pavement markings, as required by condition D15, the Applicant must arrange an inspection with RMS for formal handover of assets. The handover of assets must occur prior to commencement of use of the development.		The Project only recently commenced construction	Not triggered
D17	The Applicant must maintain records of all dates in relation to installing, altering and removing traffic control devices related to speed.		The Project only recently commenced construction	Not triggered
Mechanical Ventilation				
D18	Following completion, installation and testing of all mechanical ventilation systems, the Applicant must provide evidence to the satisfaction of the Certifying Authority, prior to the final occupation, that the installation and performance of the mechanical systems complies with:		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
	<ul style="list-style-type: none"> a) the BCA; b) AS 1668.2-2012 The use of air-conditioning in buildings- Mechanical ventilation in buildings and other relevant codes; c) the development consent and any relevant modifications; and d) any dispensation granted by the NSW Fire Brigade. 			
Road Damage				
D19	The cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Subject Site as a result of construction works associated with the approved development is to be met in full by the Applicant prior to commencement of use of any stage of the development.		The Project only recently commenced construction	Not triggered
Fire Safety Certification				
D20	Prior to the final occupation, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety Certificate must be submitted to the relevant authority and Council. The Fire Safety Certificate must be prominently displayed in the building.		The Project only recently commenced construction	Not triggered
Structural Inspection Certificate				
D21	<p>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:</p> <ul style="list-style-type: none"> a) the site has been periodically inspected and the Certifying Authority is satisfied that the structural works is deemed to comply with the final design drawings; and b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s. c) person/s authorised to, for the life of the development 		The Project only recently commenced construction	Not triggered
Compliance with Food Code				
D22	The Applicant is to obtain a certificate from a suitably qualified tradesperson, certifying that the kitchen, food storage and food preparation areas have been fitted in accordance with the AS 4674 Design, construction and fit-out of food premises. The Applicant must provide evidence of receipt of the certificate to the satisfaction of the Certifying Authority prior to occupation.		The Project only recently commenced construction	Not triggered
Stormwater Quality Management Plan				
D23	<p>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:</p> <ul style="list-style-type: none"> a) maintenance schedule of all stormwater quality treatment devices; b) record and reporting details; c) relevant contact information; and d) Work Health and Safety requirements 		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
Rainwater Harvesting				
D25	A signed works-as-executed Rainwater Re-use Plan must be provided to the Certifying Authority prior to occupation of the building.		The Project only recently commenced construction	Not triggered
Warm Water Systems and Cooling Systems				
D26	The installation, operation and maintenance of warm water systems and water cooling systems (as defined under the <i>Public Health Act 2010</i>) must comply with the <i>Public Health Act 2010</i> , Public Health Regulation 2012 and Parts 1 and 2 (or Part 3 if a Performance-based water cooling system) of <i>AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance</i> and the NSW Health Code of Practice for the Control of Legionnaires' Disease.		The Project only recently commenced construction	Not triggered
Outdoor Lighting				
D27	The Applicant must ensure the installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers. Outdoor lighting must: <ul style="list-style-type: none"> a) comply with the latest version of AS 4282-1997 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and b) be mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. Upon installation of outdoor lighting, but before it is finally commissioned, the Applicant must submit to the Certifier evidence from a qualified practitioner demonstrating compliance in accordance with this condition.		The Project only recently commenced construction	Not triggered
Signage				
D28	Way-finding signage and signage identifying the location of staff car parking must be installed prior to occupation.		The Project only recently commenced construction	Not triggered
D29	'No vehicular entry' signage must be installed to direct vehicles not to enter the southern staff car park on Argyle Street from the Wonga Road entry.		The Project only recently commenced construction	Not triggered
D30	Bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas prior to occupation.		The Project only recently commenced construction	Not triggered
D31	'Do not drink' signage on non-potable water used for toilet flushing and to new hose taps and irrigation systems for landscaped areas must be installed within the site prior to occupation.		The Project only recently commenced construction	Not triggered
Operational Waste Management Plan				
D32	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: <ul style="list-style-type: none"> a) detail the type and quantity of waste to be generated during operation of the development; b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); c) detail the materials to be reused or recycled, either on or off site; and 		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
	d) include the Management and Mitigation Measures included in RtS			
Validation Report				
D33	<p>The Applicant must prepare a Validation Report for the development. The Validation Report must:</p> <ul style="list-style-type: none"> a) be prepared by an EPA accredited Site Auditor; b) be submitted to EPA, the Planning Secretary and the Certifying Authority for information one month after the completion of remediation works; c) be prepared in accordance with the RAP and the <i>Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites</i> (OEH, 2011); d) include, but not be limited to: <ul style="list-style-type: none"> (i) comment on the extent and nature of the remediation undertaken; (ii) describe the location, nature and extent of any remaining contamination on site; (iii) sampling and analysis plan and sampling methodology; (iv) results of sampling of treated material, compared with the treatment criteria; (v) details of the volume of treated material emplaced within the containment cell and its location; (vi) results of any validation sampling, compared to relevant guidelines/criteria; (vii) discussion of the suitability the remediated areas for the intended land use; and (viii) any other requirement relevant to the project. 		The Project only recently commenced construction	Not triggered
Site Audit Report and Site Audit Statement				
D34	Prior to occupation of the building, the Applicant must obtain from an EPA accredited Site Auditor, a Site Audit Statement and a Site Audit Report which demonstrates that the site is suitable for its intended use(s).		The Project only recently commenced construction	Not triggered
D35	Within three months of submission of the Validation Report required by condition D26, the Applicant must demonstrate to the satisfaction of the Certifying Authority that the Site Auditor has submitted a Site Audit Report and Site Audit Statement to EPA in accordance with the requirements of EPA's Guidelines for the NSW Site Auditor Scheme (DEC, 2006).		The Project only recently commenced construction	Not triggered
Landscaping				
D36	<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"> a) Include revised landscape plan as per condition B4 to include planting in accordance with the approved Softscape Tree Size Specification & Formal Softscape Areas (issue B) prepared by Arcadia Landscape Architecture dated March 2019 and at least 14 additional canopy trees; b) detail the species to be planted on-site; c) include details of the area surrounding the education trail is to be s to be rehabilitated with local native plants; 		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
	<ul style="list-style-type: none"> d) include details that the native trees to be removed from the site are to be salvaged, including tree hollows and tree trunks (greater than 25cm in diameter and 3m in length) and used to enhance habitat at the site; e) include details of the installation of artificial nest boxes which are suitable to native fauna; f) detail that the seeds from native plants to be removed is collected and used in the landscape area; g) provide an ongoing weed control and maintenance program to maintain the existing and new remnant native vegetations; h) describe the monitoring and maintenance measures to manage revegetation and landscaping works; and i) comply with the principles of Appendix 5 of <i>Planning for Bush Fire Protection 2006</i>. 			
D37	The Applicant must not commence operation until the Landscape Management Plan is submitted to the Certifying Authority.		The Project only recently commenced construction	Not triggered
Asset Protection Zones				
D38	Prior to the commencement of operation, the entire property must be managed as an inner protection zone (IPA) as outlined within section 4.1.3 and Appendix 5 of the <i>Planning for Bush Fire Protection 2006</i> and the NSW RFS document Standards for asset protection zones.		The Project only recently commenced construction	Not triggered
Speed Limit Authorisation				
D39	<p>The Applicant must submit the following details to RMS, at least eight weeks prior to occupation of the site, and obtain authorisation to install School Zone signs and associated pavement markings, and / or removal / relocation of any existing Speed Limit signs:</p> <ul style="list-style-type: none"> a) a copy of the Conditions of Consent; b) the proposed school commencement/opening date; c) two sets of detailed design plans showing the following: <ul style="list-style-type: none"> (i) accurate Site boundaries; (ii) details of all road reserves, adjacent to the Site boundaries; (iii) all proposed access points from the Site to the public road network and any additional conditions imposed/proposed on their use; (iv) all existing and proposed pedestrian crossing facilities on the adjacent road network; (v) all existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings); and (vi) all existing and proposed street furniture and street trees. 		The Project only recently commenced construction	Not triggered
PART E POST OCCUPATION				
Out of Hours Event Management Plan				
E1	<p>The Applicant is to prepare an Out of Hours Event Management Plan for out of hours events run by the school that involve 100 or more people. The plan must be prepared in consultation with Council, and include the following:</p> <ul style="list-style-type: none"> a) the number of attendees, time and duration; 		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
	<ul style="list-style-type: none"> b) arrival and departure times and modes of transport; c) where relevant, a schedule of all annual events; 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); e) measures to minimise localised traffic and parking impacts; and f) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan. <p>The Applicant must submit a copy of the Out of Hours Event Management Plan to the Department and to the Council, prior to commencement of the first event. The Out of Hours Event Management Plan must be implemented by the Applicant for the duration of the identified events or use.</p>			
E2	<p>The Applicant is to prepare an Out of Hours Event Management Plan for out of hours events run by external parties that involve 100 or more people. The plan must be prepared prior to each relevant event, in consultation with Council, and include the following:</p> <ul style="list-style-type: none"> a) the number of attendees, time and duration; b) arrival and departure times and modes of transport; c) where relevant, a schedule of all annual events; 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); e) measures to minimise localised traffic and parking impacts; and f) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan. <p>The Applicant must submit a copy of the Out of Hours Event Management Plan to the Department and to the Council, prior to commencement of each relevant event. The Out of Hours Event Management Plan must be implemented by the Applicant for the duration of the identified community event or use.</p>		The Project only recently commenced construction	Not triggered
Operation of Plant and Equipment				
E3	<p>All plant and equipment used on site, or to monitor the performance of the development must be:</p> <ul style="list-style-type: none"> a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner. 		The Project only recently commenced construction	Not triggered
Community Communication Strategy				
E4	The Community Communication Strategy, as approved by the Planning Secretary, must be implemented for a minimum of 12 months following the completion of construction.		The Project only recently commenced construction	Not triggered
Operational Noise Limits				
E5	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in <i>Acoustic Assessment Report</i> prepared by GHD dated April 2018 and Section 4.55 <i>Acoustic Assessment report</i> 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 hours, must not exceed 5 dB(A) above the background noise level when measured at the boundary of any sensitive receiver.		The Project only recently commenced construction	Not triggered

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
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"> a) During weekday mornings; b) Later than 6:00 pm on weeknights; and c) Other than between the hours of 8:00 am and 6:00 pm on Saturdays; and during Sundays and public holidays. 		The Project only recently commenced construction	Not triggered
Unobstructed Driveways and Parking Areas				
E11	All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.		The Project only recently commenced construction	Not triggered
Green Travel Plan				
E12	The Green Travel Plan required by condition D12 of this consent must be updated annually and implemented.		The Project only recently commenced construction	Not triggered
Outdoor Lighting				
E13	Notwithstanding Condition D27, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.		The Project only recently commenced construction	Not triggered
Fire Safety Certificate				
E14	The owner must submit to Council an Annual Fire Safety Statement, each 12 months after the final Safety Certificate is issued. The certificate must be on, or to the effect of, Council's Fire Safety Statement.		The Project only recently commenced construction	Not triggered
Landscaping				

Unique ID	Compliance requirement	Evidence collected for previous audit	Audit findings and recommendations	Compliance status at previous audit
E15	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition D36 for the duration of occupation of the development.		The Project only recently commenced construction	Not triggered
E16	To allow for diversity of local provenance native trees, shrubs and groundcover species to rehabilitate, mowing is not to occur in the eastern side of the site with the remaining native remnant vegetation.		The Project only recently commenced construction	Not triggered
Asset Protection Zones				
E17	The asset protection zones required by condition D38 shall be maintained for the duration of occupation of the development.		The Project only recently commenced construction	Not triggered
Ecologically Sustainable Development				
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 8, 259 George Street,
Sydney, NSW 2000

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

Dear Mr Kavanagh

Picton High School Redevelopment (SSD 8640) Condition C38

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

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

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

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

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

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

Yours sincerely



Kate Moore *03/05/2019*
A/ Principal Compliance Officer (Social Infrastructure)
As nominee of the Secretary

Appendix C. Consultation records

Derek Low

From: Rachael Chick
Sent: Wednesday, 20 May 2020 1:00 PM
To: Michael Buckley; Wollondilly Shire Council
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 third 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. 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 2 June 2020 and pertains to post-approval requirements and compliance.

The purpose of this email is to consult with Wollondilly Shire Council 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 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.

Kind regards,

Rachael Chick
Environmental Consultant



E: rchick@wolfpeak.com.au

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

www.wolfpeak.com.au

This email is intended only for the addressee and may contain confidential information. If you receive this email in error, please delete it and any attachments and notify the sender immediately by reply email. WolfPeak takes all care to ensure that attachments are free from viruses or other defects. WolfPeak assume no liability for any loss, damage or other consequences, which may arise from opening or using an attachment.

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

Derek Low

From: Michael Buckley <Michael.Buckley@wollondilly.nsw.gov.au>
Sent: Tuesday, 2 June 2020 5:58 PM
To: Derek Low; Rachael Chick
Cc: Toni Averay; Mike Nelson; Norma Toweel; Corrie Swanepoel; Robyn Cooper; Michael Malone
Subject: RE: Independent Audit of Picton High School Redevelopment (SSD 8640)
Importance: High

Hi Derek, Rachael.

Reference is made to your email dated 20 May 2020 in reference to the pending independent audit. Council also notes that it did receive any return advice on the outcome of the previous audit carried out in November 2019.

Notwithstanding, Council is of the strong opinion that the conditions of the SSD approval have not been fully complied with in terms of achieving a satisfactory environmental performance and compliance outcome for the entire project.

For the purposes of the audit, please find below comments provided by Council's Engineering/Infrastructure section, and planning.

Please be advised that Council has not been formally advised of any actions resulting from Council's previous comments submitted to last year's audit, nor of those concerns, in our view have been satisfactory addressed or acknowledged, which has placed a considerable amount of stress, time and effort towards Council officers who have to inspect and take control on a weekly basis, in particular for, Engineers and Compliance officers that endeavour to liaise with the project managers/builders, and the community to resolve ongoing day to day matters with regards to parking, traffic chaos along Argyle Street and in particular Wonga Road.

Please find below comments from Council's – 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)*
- *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 were 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.
- 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.

****The turn circle at Wonga Road was meant to be constructed last Christmas holidays (2019) to remove the hazard of trucks enter the construction site and buses using the bus bay at Argyle Street at the same time – but as we all know, this never happened and so Council are left responding to complaints from members of the public trying to drop kids off in the morning. What will it be like when the new school is operational and we have **43 parking spaces removed from Argyle Street?****

The 50 new spaces intended onsite along the northern boundary are only “informal spaces” – not constructed and not line marked, pretty much like it was before construction began, so I don’t think they count in the equation of how many onsite parking spaces there will be. And it would be interesting to see where the security gate goes and how much of any if it will be available during school hours, or after hours...

From a planning perspective, Council would question SSD compliance, and see relevance for the auditors and DPIE to investigate a number of conditions such as; A21 – Environmental Auditing, A23 – Compliance, B22 – Construction Parking, B39 – Sydney Water Approval and C5 – Construction hours.

With regards to B39 – Sydney Water Approval, Wollondilly Council has been formally advised by Sydney Water that new development proposals in Picton and Tahmoor including other surrounding localities do not have the capacity for the removal of waste water. To this end, such new development proposals have been put on hold by Council waiting for Sydney Water to address this unfortunate matter pertaining to relevant infrastructure. As the school population is to steadily increase, it would be prudent for DPIE and the auditors to seek advice on this issue, for the school when ready for operation.

Finally, in the interest of both Council and DPIE, it is requested that a formal meeting be convened with Senior Officers to discuss the outstanding Council matters raised above and the ongoing commitment of DPIE towards a satisfactory outcome of the School project and for the community.

Council would also like the auditors and or the DPIE to respond back to Council of the outcome of this current audit.

Regards, Michael Buckley

Michael Buckley
Development Assessment Team Leader



From: Derek Low [mailto:dlow@wolfpeak.com.au]
Sent: Thursday, 28 May 2020 11:06 AM
To: Michael Buckley <Michael.Buckley@wollondilly.nsw.gov.au>; Rachael Chick <rchick@wolfpeak.com.au>
Subject: RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Michael.

Unfortunately we cannot shift the date of the audit, however if you send your comments before the end of next week we should have time to investigate prior to submitting the report to DPIE.

Regards

Derek Low
Principal Environmental Consultant



E: dlow@wolfpeak.com.au
P: 0402 403 716
A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000

www.wolfpeak.com.au



This email is intended only for the addressee and may contain confidential information. If you receive this email in error please delete it and any attachments and notify the sender immediately by reply email. WolfPeak takes all care to ensure that attachments are free from viruses or other defects. WolfPeak assume no liability for any loss, damage or other consequences, which may arise from opening or using an attachment.

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

From: Michael Buckley <Michael.Buckley@wollondilly.nsw.gov.au>
Sent: Thursday, 28 May 2020 10:56 AM
To: Rachael Chick <rchick@wolfpeak.com.au>

Derek Low

From: Rachael Chick
Sent: Wednesday, 20 May 2020 12:57 PM
To: compliance@planning.nsw.gov.au; Michaela Burgess; 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).

The approved auditors are currently preparing to undertake the third 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. 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 2 June 2020 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.

Kind regards,

Rachael Chick
Environmental Consultant



E: rchick@wolfpeak.com.au

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

www.wolfpeak.com.au

This email is intended only for the addressee and may contain confidential information. If you receive this email in error, please delete it and any attachments and notify the sender immediately by reply email. WolfPeak takes all care to ensure that attachments are free from viruses or other defects. WolfPeak assume no liability for any loss, damage or other consequences, which may arise from opening or using an attachment.

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

Derek Low

From: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Sent: Wednesday, 20 May 2020 12:59 PM
To: Rachael Chick
Subject: Compliance Mailbox Automatic Reply

Thank you for contacting the NSW Department of Planning, Industry and Environment's – Planning & Assessment Compliance Team.

If you are making a complaint, you will need to lodge this online via the Major Projects website - <https://www.planningportal.nsw.gov.au/major-projects/services/complaint-form>.

If you are submitting a post approval or compliance document, notification or request as required under the conditions of consent or approval, you will need to lodge this online via the Major Projects website at <https://www.planningportal.nsw.gov.au/major-projects/services/lodge-post-approval-documents-0>.

To do this, please refer to the instructions available [here](#).

Kind regards,

Compliance Team
Planning & Assessment
NSW Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street | Locked Bag 5022 | Parramatta NSW 2124
T 1300 305 695
E compliance@planning.nsw.gov.au

Derek Low

From: Emmanuel Smith-Aspros <Emmanuel.Smith-Aspros@planning.nsw.gov.au>
Sent: Wednesday, 27 May 2020 8:25 AM
To: Rachael Chick
Subject: FW: Independent Audit of Picton High School Redevelopment (SSD 8640)

Good morning Rachel,

Thank you for your correspondence in relation to Picton High School Redevelopment (SSD 6840) seeking feedback from the Department in relation to the upcoming independent audit.

The Department requests that additional focus is placed on the Project's consultation with Wollondilly Shire Council, particularly in relation to conditions relating to operational traffic design and consultation with Council and other stakeholders. I note Condition D13 requiring consultation for the Operational Transport and Access Management Plan may not be triggered at this stage. .

Please let me know if you have any questions.

Regards

Emmanuel Smith-Aspros
Senior Compliance Officer (Social Infrastructure)

Planning & Assessments | Department of Planning, Industry and Environment
T 02 8275 1232 | M 0499 399 756 | E emmanuel.smith-aspros@planning.nsw.gov.au
Locked Bag 5022 | PARRAMATTA NSW 2124
www.dpie.nsw.gov.au

From: Rachael Chick <rchick@wolfpeak.com.au>
Sent: Wednesday, 20 May 2020 12:57 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>; Michaela Burgess <Michaela.Burgess@epa.nsw.gov.au>; Kate Moore (DPE) <Kate.Moore@IPCN.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 third 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. 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 2 June 2020 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.

Kind regards,

Rachael Chick

Environmental Consultant



E: rchick@wolfpeak.com.au

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

www.wolfpeak.com.au

This email is intended only for the addressee and may contain confidential information. If you receive this email in error, please delete it and any attachments and notify the sender immediately by reply email. WolfPeak takes all care to ensure that attachments are free from viruses or other defects. WolfPeak assume no liability for any loss, damage or other consequences, which may arise from opening or using an attachment.

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

Derek Low

From: Rachael Chick
Sent: Wednesday, 20 May 2020 1:05 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 third 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. 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 2 June 2020 and pertains to post-approval requirements and compliance.

The purpose of this email is to consult with the Environment Protection Authority 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 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.

Kind regards,

Rachael Chick
Environmental Consultant



E: rchick@wolfpeak.com.au

A: Suite 2, Level 10, 189 Kent Street, Sydney NSW 2000
www.wolfpeak.com.au

This email is intended only for the addressee and may contain confidential information. If you receive this email in error, please delete it and any attachments and notify the sender immediately by reply email. WolfPeak takes all care to ensure that attachments are free from viruses or other defects. WolfPeak assume no liability for any loss, damage or other consequences, which may arise from opening or using an attachment.

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

Derek Low

From: Environment Line <info@environment.nsw.gov.au>
Sent: Wednesday, 20 May 2020 1:06 PM
To: Rachael Chick
Subject: Thank you for your email. Your Reference Id is 00926941 (ref:_00D7F6iTix._5007F10k3rD:ref)



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

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

Please note that in sending us an email, we will record your email address for the purpose of responding to your enquiry. If your email requires a transaction or another more detailed service, we may record the personal details you supply, or request further details from you in order to provide the service you have requested. Where this is not necessary you can request your details remain anonymous or confidential. Details of our Privacy information can be found on the website at www.environment.nsw.gov.au/howeare/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._5007F10k3rD:ref

Derek Low

From: Anna Timbrell <Anna.Timbrell@epa.nsw.gov.au>
Sent: Tuesday, 2 June 2020 12:24 PM
To: Rachael Chick
Cc: Benn Treharne; Sarah Thomson
Subject: Picton High Redevelopment - SSD 8640 - Independent Audit

Hi Rachael

I refer to your email to the EPA dated 20 May 2020 regarding the independent audit of the Picton High School Redevelopment (SSD 8640).

The EPA wishes to advise that it has received two complaints regarding the construction of this project:

- 7 November 2019 – about dust coming from the construction site. The complainant advised the weather was windy, that the builders were working with excavators and there was no equipment on the site using water or any other means to suppress the dust.
- 13 November 2019 – also about dust from the site.

Kind regards

Anna Timbrell

Environmental Planning Officer – Metropolitan Infrastructure

Metropolitan Branch, NSW Environment Protection Authority

Ph: 02 9274 6345

anna.timbrell@epa.nsw.gov.au www.epa.nsw.gov.au [info@EPA NSW](mailto:info@epa.nsw.gov.au)

Report pollution and environmental incidents 131 555 (NSW only) or +61 2 9995 5555

Please send all official correspondence to metropolitan.transport@epa.nsw.gov.au



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

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

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	03/07/20

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

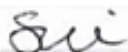
Project name	Picton High School Redevelopment
Consent Number	SSD 8640
Description of Project	Redevelopment of Picton High School including demolition of buildings, excavation, refurbishment of existing buildings, construction of a new two and three storey building connecting to existing buildings, reconfiguration 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	03/07/20

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	Steve Fermio
Signature	
Qualification	Bachelor of Science (Honours) Exemplar Global Auditor Number 110498
Company	WolfPeak Pty Ltd
Company address	Suite 2, Level 10, 189 Kent Street Sydney NSW 2000

Appendix E. Site inspection photographs.



Photo 1: Waste segregation



Photo 2: Rock filter dam



Photo 3: Tower crane. Note several complaints were received in relation to its erection



Photo 4: The three-story site sheds on the northern boundary adjacent to residential properties



Photo 5: Tree protection zone



Photo 6: Site hoarding free of graffiti



Photo 7: Wonga Road works – note stockpiles beyond the site boundary (fenced) in the background.



Photo 8: Wonga Road works with access to the left.



Photo 9: Main building structure erected with services being installed



WolfPeak Pty Limited

Suite 2, Level 10, 189 Kent Street, Sydney 2000

17A High Street, Wauchope 2446

www.wolfpeak.com.au