

INDEPENDENT AUDIT REPORT


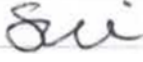
PICTON HIGH SCHOOL – SSD 8640

JUNE 2021

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EXECUTIVE SUMMARY

The NSW Department of Education – School Infrastructure NSW (SINSW) is 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.

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 the development consent (SSD 8640 MOD 1) was approved, which provided for changes to design including additional classrooms and alteration of other teaching facilities, tree removal, changes to parking and waste collection arrangements, sustainable design requirements and signage.

On 10 April 2021, a modification to the development consent (SSD 8640 MOD 2) was approved, which amended conditions to incorporate updated landscape plans and alter requirements relating to dilapidation and contamination matters.

A third modification application, requesting to remove a requirement to salvage native trees and hollows for future habitat is currently under assessment.

Mace Group has been appointed as the client representative on behalf of SINSW. Taylor Construction is the principal contractor. Construction works began 10 May 2019.

The objective of this Independent Audit is to satisfy SSD 8640 Schedule 2, Condition of Consent (CoC) C41. It requires that Independent Audits of the development are 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 fourth Independent Audit for the construction period, also capturing pre-operational and operational requirements, covering the period from 22 June 2020 to 21 June 2021.

Works undertaken during the audit period include completion of Stage 1 and Stage 2 buildings, landscaping, kiss and drop facilities and Wonga Road and Argyle Street upgrade works. Operation of the new school commenced on 19 April 2021. Stage 3 works (comprising disassembly and removal of all Temporary School demountable buildings, installation of a sports field and surrounding infrastructure, and landscaping and fencing works alongside the refurbishment of the Agricultural plot and associated buildings) were underway.

The overall outcome of the Independent Audit indicates that compliance is being tracked by Mace Group and Taylor Constructions, with some room for improvement.

Compliance records were well organised and available at the time of the site inspection and interview with Mace Group and Taylor Constructions personnel on and following 4 June 2021. 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:

- There were 168 CoCs assessed.
- There were 13 x non-compliances identified against the CoCs. These relate to content on the website, submission of documents and notifications to the Certifier and the Department, Out of Hours Works, archaeological heritage, signage and satisfaction of Transport for NSW and content of the stormwater and landscape management plans.
- Six observations were identified in relation to the CoCs. These relate to complaints received about property impacts, submission of the dilapidation report, tree protection, implementation of recommendations from the Road Safety Evaluation and content of the operational waste management plan.
- The two previously opened observations (from the second and third Independent Audits) have been closed.

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

1. INTRODUCTION

1.1 The Project

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



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

The Project is intended 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 the 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.

On 10 April 2021, a modification to the development consent (SSD 8640 MOD 2) was approved, which amended conditions to incorporate updated landscape plans and alter requirements relating to dilapidation and contamination matters.

A third modification application, requesting to remove a requirement to salvage native trees and hollows for future habitat, is currently under assessment.

Mace Group (Mace) have been appointed as the client representative on behalf of SINSW. Taylor Construction (Taylor) are the principal contractor. Construction works began 10 May 2019. Works undertaken during the audit period included completion of Stage 1 and Stage 2 buildings, landscaping, kiss and drop facilities and Wonga Road and Argyle Street upgrade works. Operation of the new school commenced on 19 April 2021. Stage 3 works (comprising disassembly and removal of all Temporary School demountable buildings, installation of a sports field and surrounding infrastructure, and landscaping and fencing works alongside the refurbishment of the Agricultural plot and associated buildings) were underway.

1.2 Approval requirements

Conditions of Consent (CoC) C38 – C43 of Schedule 2 of SSD 8640 set out the requirements for undertaking Independent Audits. 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): Master of Environmental Engineering Management, Exemplar Global Certified Principal Environmental Auditor (Certificate No 114283)
- Steve Fermio (Lead 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 Independent Audit 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 Independent Audit Program was prepared prior to commencement of construction and submitted to the Department and the Certifying Authority, in accordance with the IAPAR and CoC C39.

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

This Independent Audit 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 Independent Audit relates to the Project works from 22 June 2020 to 21 June 2021.

The scope of the Independent Audit 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 Independent Audit was conducted in a manner consistent with AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems and the methodology set out in the Department’s IAPAR. An overview of the audit activities, as specified in AS/NZS ISO 19011, is presented in Figure 2.

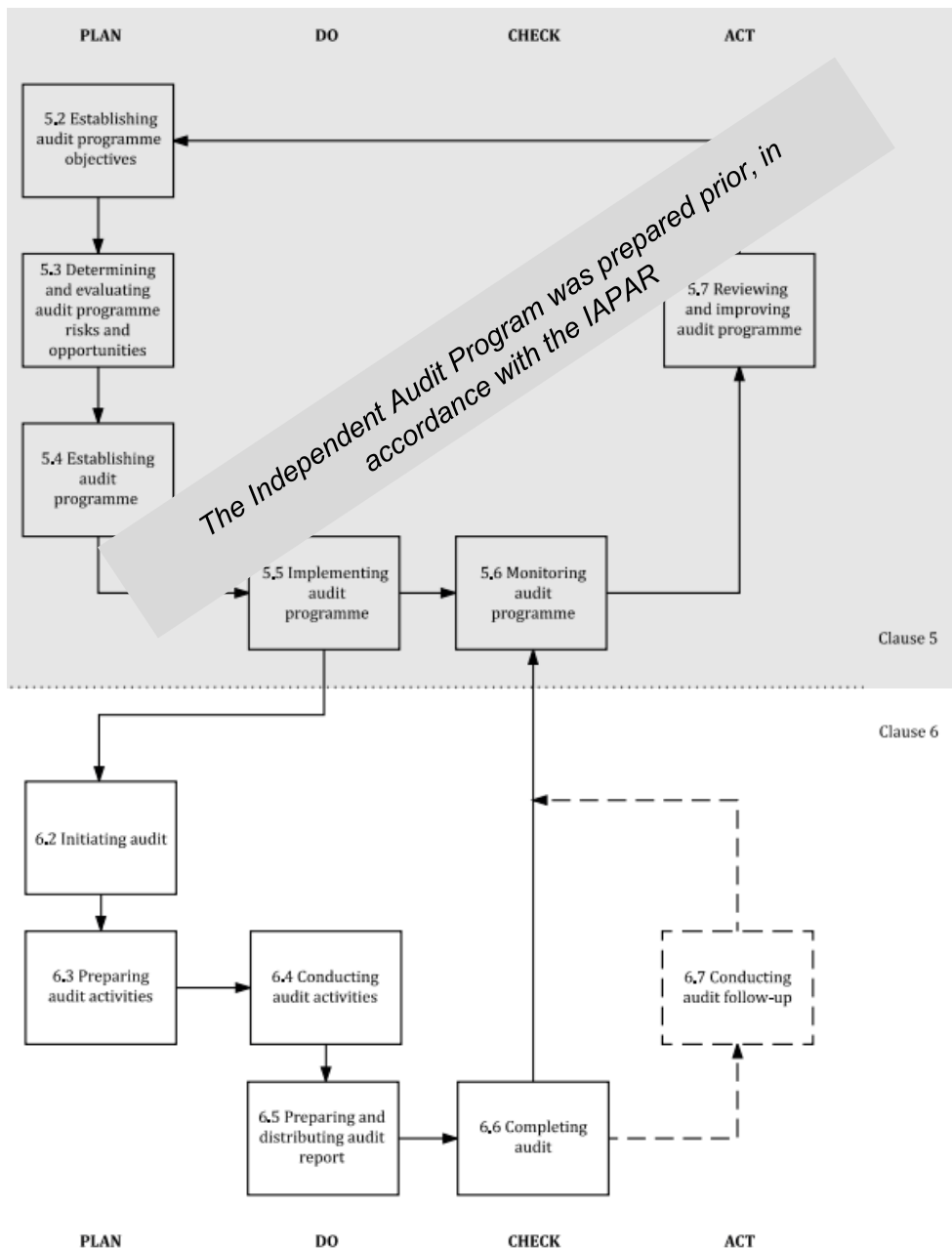


Figure 1 Audit activities overview (modified from AS/NZS ISO 19011). Subclause numbering refers to the relevant subclauses in the Standard.

2.1.1 Audit initiation and scope of 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 21 May 2021 WolfPeak consulted with the Department and Wollondilly Shire Council to obtain their input into the scope of the Independent Audit 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 Industry and Environment	<p>The Department requested that additional focus is placed on the following aspects:</p> <ul style="list-style-type: none"> • Check and confirm whether all plans and documents have been submitted to the relevant agencies including the Department before occupation and operation of the school. The audit report must describe if there is evidence of submission and/or approval, as per the issued consent, is not provided by the auditee • Notifications of such things as non-compliances and reviews of project documents • Ensuring the Applicant’s website has all the required documentation • Administrative conditions more generally, and • Condition C31 regarding waste storage. 	Included in scope. Refer Section 3 and Appendix A.
Wollondilly Shire Council	Council did not respond to the request for input.	-

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 Independent Audit.

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

- *SSD 8640 Environmental Impact Statement, 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)
- Development Consent SSD 8640, 20 December 2019 (the Consent) and Modifications 1 and 2
- *Staging Report, Picton High School*, SSD 8640, SINSW, 14 December 2020
- *Construction Environmental Management Plan Picton High School*, SMEC, 5 April 2019 and updates 20 January and 2 March 2020 (the CEMP)
- *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)
- *Community Communication Strategy Picton High School Redevelopment*, April 2019, Schools Infrastructure NSW (the CCS)
- *Out of Hours Event Management Plan*, Stantec, 02 June 2021
- *Operational Waste Management Plan*, SMEC, 13 April 2021
- *Operation and Maintenance Manual*, Spel Stormwater (no date / revision)
- *Operational Transport Access Management Plan*, Stantec, 24 April 2021.

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 4 June 2021. The following personnel took part in the Independent Audit:

- Gordon Barlow – Assistant Project Manager – Mace Group
- Moustafa Ibrahim – Project Manager – Taylor Constructions
- Derek Low – Auditor – WolfPeak.

2.1.4 Meetings

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

During the opening meeting, the objectives and scope of the Independent Audit, 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.

2.1.5 Interviews

The Auditor conducted interviews during the site inspection and remotely on 7 June 2021 to assist with verifying the compliance status of the development. All other communication was conducted remotely, which included a detailed request for information and auditee responses to the request.

2.1.6 Site inspection

The on-site audit activities took place on 4 June 2021. The on-site audit activities included an inspection of the site and work activities. Photos are presented in Appendix F.

2.1.7 Document review

The Independent Audit 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.

2.1.8 Generating audit findings

Independent Audit 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.

2.1.9 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.

2.1.10 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.

2.1.11 Completing the audit

The Independent Audit 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 CoCs from Schedule 2 of SSD 8640 applicable to the works being undertaken, and the strategies, plans and programs under the consent. The evidence sighted against each requirement is detailed within 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. In summary:

- There were 168 CoCs assessed.
- There were 13 x non-compliances identified against the CoCs. These relate to content on the website, submission of documents and notifications to the Certifier and the Department, Out of Hours Works, archaeological heritage, signage and satisfaction of Transport for NSW and content of the stormwater and landscape management plans.
- Six observations were identified in relation to the CoCs. These relate to complaints received about property impacts, submission of the dilapidation report, tree protection, implementation of recommendations from the Road Safety Evaluation and content of the operational waste management plan.
- The two previously opened observations (from the second and third Independent Audits) have been closed.

Table 1 Audit findings and actions

Item	Ref	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status
DECEMBER 2019 PREVIOUSLY OPEN AUDIT FINDINGS						
1	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 of the December 2019 Audit Report 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>CLOSED</p> <p>Based on the evidence which shows that Wonga Road and Argyle Street works were approved by Council, and that completion certificates had been issued by Council for those works, it appears to the Auditor that Council and the Project have broken previous impasses and are working cooperatively.</p> <p>The Auditor requested that Council provide input into the scope of this Independent Audit. No response was provided.</p>
JUNE 2020 PREVIOUSLY OPEN AUDIT FINDINGS						
2	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"> be prepared by an EPA accredited Site Auditor; be submitted to EPA, the Planning Secretary and the Certifying Authority for information one month after the completion of remediation works; be prepared in accordance with the RAP and the Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites (OEHL, 2011); include, but not be limited to: <ol style="list-style-type: none"> comment on the extent and nature of the remediation undertaken; describe the location, nature and extent of any remaining contamination on site; sampling and analysis plan and sampling methodology; results of sampling of treated material, compared with the treatment criteria; details of the volume of treated material emplaced within the containment cell and its location; results of any validation sampling, compared to relevant guidelines/criteria; discussion of the suitability the remediated areas for the intended land use; and any other requirement relevant to the project. 	<p>Seek clarification from the Department on relevance of CoC D33, D34 and D35 and appropriate steps for resolution.</p>	<p>SINSW</p> <p>31/09/20</p>	<p>CLOSED</p> <p>A modification was approved which altered the wording of this requirement. Refer CoCs D33 – D35 within Appendix A.</p>

Item	Ref	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status
			<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> <ul 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) 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. 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. 			
FINDINGS FROM THE JUNE 2021 INDEPENDENT AUDIT						
3	CoC A22	Non-compliance	<p>CoC A22 requires that certain information be made publicly available on the Project website, including a complaints register updated monthly.</p> <p>The website contains the information identified in CoC A22 a)(i)-(x) with the exception of the current complaints register.</p>	The May 2021 complaints register was published after the drafting of this Audit Report.	NA	CLOSED
4	CoC B6	Non-compliance	<p>CoC B6(a) requires that prior to the commencement of construction works associated with the construction of the car park adjacent to the northern boundary of the site, the Applicant is to engage a qualified structural engineer to prepare a pre-construction dilapidation report and submit it to Council and the Certifier. The report must provide an accurate record of the existing condition of adjoining private properties, as detailed in the Applicant's letter dated 24 March 2021 submitted in support of modification SSD-8640-Mod-1, that are likely to be impacted by construction works associated with the construction of the car park adjacent to the northern boundary of the site.</p> <p>Dilapidation reports prepared for the north boundary works were not submitted to the identified stakeholders prior to the commencement of construction of the relevant works. The reports were submitted to the stakeholders on 16/06/21 (after the Independent Audit site inspection).</p>	The dilapidation reports were submitted after the due date.	NA	CLOSED
5	CoC B37	Non-compliance	<p>CoC B37 requires that the Applicant must make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the Certifier in writing at least seven days before this is done.</p> <p>Construction Compliance Report 3 had not been published on the Project website until after the Independent Audit site inspection. The Certifier was not notified of the publication of Construction Compliance Report 3, Construction Compliance Report 4, Pre-Operations</p>	Publication, and notification of publication, occurred after the Independent Audit site inspection.	NA	CLOSED

Item	Ref	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status
			Compliance Report 1 and Pre-Operations Compliance Report 2 until after the Independent Audit site inspection.			
6	CoC C6	Non-compliance	<p>CoC C6 requires that 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>Out of Hours Works were completed during April as part of Argyle Street upgrade works. It is understood that drainage, line marking and construction of the island was all approved by Council to occur during the evening and night time periods, however only line marking went ahead during the Out of Hours period (up to approx. 10pm). It is the Auditors opinion that these works would not be inaudible at the nearest receiver and the works do not conform to the requirements of C6 a) – d). That being said, notification was provided to potentially affected residents prior.</p>	The relevant Out of Hours Works were completed and notified to potentially affected residents.	NA	CLOSED
7	CoC C18	Observation	<p>CoC C18 requires that vibration caused by construction at any residence or structure outside the site must be limited to:</p> <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). <p>1 x complaint was received in April 2021 regarding cracks on a resident's property. The complainant attributed this to piling works. The auditees advise that piling works were completed in 2018-19 (i.e.: not during the period relating to the complaint) and were at material distance from the property with existing buildings in between the piling and the receiver.</p>	SINSW has attempted to contact resident to inspect and address concern and the complaint remains open. Investigation into the complaint is ongoing.	SINSW 31/07/21	OPEN
8	CoC C21	Observation	<p>CoC C21 requires that 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> <ul style="list-style-type: none"> a) NSW EPA Sampling Design Guidelines; b) Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017; c) Guidelines for Consultants Reporting on Contamination Sites, 2011; and d) The National Environment Protection (Assessment of Contamination) Measure. <p>The contamination investigation reports indicate that sampling was carried out within the footprint and immediate surrounds existing structures, infrastructure and in ground utilities which are subject to demolition / removal. A Site Audit Statement and Site Audit Report were prepared for Stages 1 and 2 and confirms that these stages are suitable for its intended use.</p> <p>The Auditor observes that, whilst not required by this condition and deemed as low risk by the EIS, no report has been sighted to demonstrate that detailed investigations have been carried out on the open space across Stage 3 (i.e.: the playing grounds).</p>	Note only.	NA	CLOSED

Item	Ref	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status
9	CoC C22	Observation	<p>CoC C22(c) requires that 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; as amended by the letter prepared by Horticultural Management Services dated 16 October 2019.</p> <p>The arboricultural reports sighted do not appear to have assessed the trees along the eastern boundary between the fence line and future playing grounds and, therefore, are not specific on the need for protection of these specimens (or otherwise). During the inspection it was observed that the trees along the eastern boundary of Stage 3 works, between the fence line and future playing grounds are to be retained and are not protected. The Auditor also observes that there were minimal works evident within the area considered to be the tree protection zone (12 x trunk dia. measured at breast height).</p>	Arrange for the Project arborist to inspect the subject trees and to confirm tree protection requirements (if any).	Taylor 31/07/21	OPEN
10	CoC C26	Observation	<p>CoC C26 requires that 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> <p>The Erosion and Sediment Control Plan was updated by Taylor for Stage 3 in April 2021, however this was only signed off by the Project civil engineer as being appropriate after the Independent Audit site inspection.</p> <p>3 x complaints were received during the audit period regarding water on the yard of an adjacent property. These were received during the large storm events in February and March 2021. The Erosion and Sediment Control Plan for that time indicates that sediment fence was in place on the boundary and that the operational stormwater network was connected. An investigation was conducted by the Project which indicates that water could have entered the property during the large rain events in February and March 2021, but that the wider area was also affected. The complaints register indicates that Taylor would assist with a clean-up in response to one of the complaints. The Auditor is not aware of the status of this commitment. SINSW consider the issue closed. No further issues have been raised.</p>	The Project confirmed that the clean-up was completed on 13/05/21.	NA	CLOSED
11	CoC C42	Non-compliance	<p>CoC C42 requires that, in accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must:</p> <ul style="list-style-type: none"> 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 Certifier; 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 Certifier in writing at least seven days before this is done. <p>The Certifier was not notified of the publication of the third Independent Audit Report until after the site inspection for the fourth Independent Audit.</p>	The Certifier was notified after the due date.	NA	CLOSED
12	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, 	Subsequent reviews and notifications have occurred.	NA	CLOSED

Item	Ref	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status
			<p>the strategies, plans and programs required under this consent must be reviewed, and the Department and the Certifier must be notified in writing that a review is being carried out.</p> <p>A review was not conducted or notified within 3 months of submission of Construction Compliance Report 3.</p>			
13	CoC C46	Non-compliance	<p>CoC C46 requires that an Archaeological Work Method Statement for the works on the alignment of the Hume Highway (Argyle Street) is to be prepared by a qualified archaeologist and be in place at the site for the duration of excavation works.</p> <p>The Archaeological Work Method Statement was prepared in 2019, however there was no evidence to demonstrate that it was implemented for works undertaken on the alignment of Hume Highway.</p>	<p>The Project, in response to this finding, engaged the Project archaeologist (AMAC) to investigate the matter. The archaeologist provided a written statement, dated 29/06/21, which concluded:</p> <p><i>At the time of the production of the AWMS, very little work was anticipated within Argyle Street that had the potential to impact on relics and therefore no archaeological fieldwork was anticipated. This document made provisions for potential changes to the building program, stating that: "an archaeological inspection should be conducted by an experienced archaeologist if plans change and the excavation is required along Argyle Street." (AMAC Group, March 2019, p7).</i></p> <p><i>While the excavations that have been carried out in the footpath of Argyle Street in March 2021 are considered a change to the development program and were not inspected by an archaeologist, it is understood that no relics were uncovered during the work. A small 3.5 tonne excavator with a flat mud-bucket was used to grade the location of the footpath. Photographs of this work show that this part of the footpath was most likely outside of the original alignment of Argyle Street (Figure 1 of AMAC's letter). The natural soil profile here was clearly intact confirming that it is unlikely relics ever existed within this location. As such, although archaeological inspection did not occur at the site, no relics were harmed in the process of the excavation of the footpath and no excavation occurred within the street itself. Based on the information supplied, we believe that compliance with Condition C46 of SSD8640 has been maintained.</i></p> <p>The Auditor is of the opinion that CoC C46 was still not complied with and that the archaeologist has confirmed, after the works were undertaken, that no impacts were likely to have occurred.</p>	NA	CLOSED
14	CoC D3	Non-compliance	<p>CoC D3 requires that the Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.</p>	<p>The information was submitted after the due date and the non-compliance was reported.</p>	NA	CLOSED

Item	Ref	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status
			Issuing of external walls and cladding certification to the Department did not occur within 7 days of the Certifier accepting it. The relevant information was issued to the Department on 09/04/21 to address the non-compliance. The non-compliance was notified on 09/04/21 in accordance with CoC C37.			
15	CoC D8	Non-compliance	<p>CoC D8 requires that prior to the commencement of operation of the development, the Applicant must implement detailed signage and line-marking plan in accordance with condition B32.</p> <p>Council issued completion certificates for the practical completion of works on Wonga Road and Argyle Street (which include signage and line marking).</p> <p>Whilst Council issued a certificate of practical completion, the Auditor understands that negotiations with Council over the last 2 years may have resulted in changes to the original design of the works on Wonga Road and Argyle Street. The Auditor requested that the auditees provide evidence to demonstrate that the signage and line-marking align with that set out in the plans prepared under CoC B32. No evidence was provided.</p>	<p>Confirm whether the signage and line-marking comply with the plan within B32.</p>	<p>Taylor / SINSW</p> <p>31/07/21</p>	OPEN
16	CoC D11	Observation	<p>CoC D11 requires that any recommendations of the Road Safety Evaluation 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.</p> <p>The Road Safety Evaluation made 22 x findings. According to a statement provided by Taylor</p> <ul style="list-style-type: none"> All findings regarding the Wonga Road works have been implemented and works achieved completion as per attached completion certification issued by Wollondilly Shire Council Findings regarding Argyle Street have only been partially implemented due to Council requirements having deviated from the original design. Findings regarding Argyle Street are currently being negotiated and consulted with Council, Transport for NSW and affected neighbouring properties to reach a revised and final design Several findings will be reviewed as a new Road Safety Evaluation is proposed to be completed to reflect final approved design. <p>The Auditor notes that bus and private vehicle drop-off and pick-up are currently in operations.</p>	<p>The auditees stated, in response to this finding, that the Road Safety Evaluation does not contain explicit recommendations relating to relevant sections of Argyle Street and Wonga Road utilised for bus and private vehicle drop off and pick up.</p> <p>The Auditor agrees, and notes that there are findings that relate to sections of Argyle Street and Wonga Road surrounding / adjacent to / interfacing with sections of road utilised for bus and private vehicle drop-off and pick-up. It is the Auditor's opinion that an updated Road Safety Evaluation on current as built design should be completed.</p>	<p>Taylor</p> <p>31/07/21</p>	OPEN
17	CoC D16	Non-compliance	<p>CoC D16 requires that 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 (Transport for NSW) for formal handover of assets. The handover of assets must occur prior to commencement of use of the development.</p> <p>Council issued completion certificates for the practical completion of works on Wonga Road (which include signage and line marking). The existing school zone markings on Argyle Street were not altered by the works.</p> <p>Wonga Road is classified as a local road and Council is the Road Authority, however the Auditor is of the understanding that Transport for NSW is responsible for School Zone signage. There was no evidence provided to demonstrate that Transport had not inspected the signs, nor had those assets handed over.</p>	<p>The Project, in response to this finding, referred to the submission made by Transport for NSW on the Project EIS. This submission, dated 08/06/18, stated that the preparation of the detailed signage and linemarking plan <i>should be made in consultation with and approved by Wollondilly Shire Council. The approved kerbside parking restrictions must be implemented to the satisfaction of Council.</i></p> <p>The Auditor notes that regardless of Transport for NSW's submission, the Department has required inspection and handover to Transport for NSW through CoC D16, which takes precedence.</p> <p>Therefore, the Auditor recommends that the Project arrange an inspection of School Zone</p>	<p>Taylor / SINSW</p> <p>31/07/21</p>	OPEN

Item	Ref	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status
				signage, speed management signage and associated pavement markings with Transport for NSW for formal handover of assets.		
18	CoC D23	Non-compliance	<p>CoC D23 requires that 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. <p>The record and reporting details, relevant contact details, are not identified in the OMP.</p>	The OMP was updated following the drafting of this Report.	NA	CLOSED
19	CoC D32	Observation	<p>CoC D32 requires that prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Department/Certifier. The Waste Management Plan must:</p> <ul style="list-style-type: none"> a) detail the type and quantity of waste to be generated during operation of the development; b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); c) detail the materials to be reused or recycled, either on or off site; and d) include the Management and Mitigation Measures included in EIS. <p>The Operational Waste Management Plan identifies collection (i.e.: commercial waste transporter collection), not disposal at destination. The Auditor considers this to be reasonable as the destinations may vary over time depending on the waste service provider.</p> <p>The hours for collection do not align with the hours specified in CoC E9.</p>	<p>The Operational Waste Management Plan was updated following the drafting of this Report, however the hours are still incorrect. The Plan states that <i>collections should be restricted to the hours 7:30 am – 6pm, Monday to Saturday.</i></p> <p>CoC E9 states that <i>collection services are not to be undertaken outside the hours of 7:30 am to 6:00 pm Monday to Friday.</i></p> <p>The Operational Waste Management Plan should be updated to align with CoC E9.</p>	Taylor 31/07/21	OPEN
20	CoC D36	Non-compliance	<p>CoC D36(d) requires that prior to the 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 include details that the native trees to be removed from the site are to be salvaged, including tree hollows and tree trunks (greater than 25cm in diameter and 3m in length) and used to enhance habitat at the site.</p> <p>Tree hollows and tree trunks were not able to be retained on the Project in line with the condition. This was notified on 27/03/21. An application to modify condition D36 (Modification 3) was lodged on 08/04/21. The application is under assessment by the Department.</p> <p>The Landscape Management Plan was not approved prior to occupation of Stage 2.</p>	Comply with the Department's requirements through the assessment and approval (if granted) of Modification 3).	SINSW In line with the requirements of Modification 3.	OPEN
21	CoC D39	Non-compliance	<p>CoC D39 requires that the Applicant must submit certain information to RMS (Transport for NSW), at least eight weeks prior to occupation of the site, and obtain authorisation to install School Zone signs and associated pavement markings, and / or removal / relocation of any existing Speed Limit signs.</p> <p>This finding relates to the same issue as that identified against CoC D16.</p>	The Project, in response to this finding, referred to the submission made by Transport for NSW on the Project EIS. This submission, dated 08/06/18, stated that the preparation of the detailed signage and linemarking plan <i>should be made in consultation with and approved by Woollondilly Shire Council. The approved</i>	Taylor 31/07/21	OPEN

Item	Ref	Type	Details of item	Proposed or completed action by the Auditee	By whom and by when	Status
			<p>Council issued completion certificates for the practical completion of works on Wonga Road (which include signage and line marking). The existing school zone markings on Argyle Street were not altered by the works.</p> <p>Wonga Road is classified as a local road and Council is the Road Authority, however the Auditor is of the understanding that Transport for NSW is responsible for School Zone signage. There was no evidence provided to demonstrate that the information specified by this condition had been provided to Transport, nor had Transport for NSW authorisation been granted.</p>	<p><i>kerbside parking restrictions must be implemented to the satisfaction of Council.</i></p> <p>The Auditor notes that regardless of Transport for NSWs submission, the Department has required inspection and handover to Transport for NSW through CoC D16, which takes precedence.</p> <p>Therefore, the Auditor recommends that the Project provide the relevant information to Transport for NSW and obtain their authorisation.</p>		

3.3 Adequacy of environmental 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.

Other than the non-compliances and observations identified in Section 3.2, which are required to be addressed for the document to be considered adequate, the documents are generally fit for purpose.

3.4 Projects' EMS

Taylor operates 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 includes the documents sighted during the audit (detailed in Appendix A) and controls observed in the field.

3.5 Summary of notices from agencies

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

3.6 Other matters considered relevant by the auditor of DPIE

Other than the matters covered elsewhere within Section 3 of this Audit Report, the Auditor has nothing further to add.

The Department asked that the Independent Audit examine issues relating to submission of documents, notification of non-compliances, content of the website, administrative conditions, and waste storage. Each of these matters were assessed and the shortcomings are included within Table 2 above.

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, with a complaints register current to end of May 2021 provided on request.

At the time of writing, 19 complaints were recorded within the Audit Period. These related to light spill from site sheds, traffic and access, privacy, housekeeping, construction noise, hours of work and property impacts (water in yard and cracking in a building).

Two complaints remained opened (relating to water impacts on a neighbour’s yard, and screening to reduce privacy concerns).

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 and whether they are consistent with the relevant impacts predicted in the EIS. A summary of the assessment is presented in Table 3.

Table 3: Summary of predicted versus actual impacts

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
Design	<p>The maximum height of the proposed development exceeds the maximum height under the Wollondilly LEP 2011.</p> <p>The development, when viewed from a public space, is of a complementary bulk and scale to the existing development.</p> <p>The proposed layout is anticipated to be more welcoming to staff and students from the primary access point, being the bus bay, with a new canopy connecting to the main building to ensure that paths of travel are protected from inclement weather.</p> <p>Reconfigured access points, including the new Wonga Road entry have been designed to minimise conflict between pedestrians and vehicles, in addition to minimising conflict between buses and other vehicles.</p> <p>A setback of more than 60m to the nearest proposed building ensures that there is no impact on any of these properties in terms of privacy loss, view loss, or overshadowing</p>	<p>The design and position appear to be consistent with the design in the approved plans (as verified by the Certifier through granting of the Crown Completion Certificate). However the Auditor notes that the setback on the northern boundary appears to be less than 60 metres.</p> <p>Two complaints relating to privacy from operational design had been received and responded to by SINSW.</p>	N

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 consistent the same as that approved.	Y
Biodiversity	The Project would result in direct impact of 0.07ha of native vegetation and indirect impact of 0.46ha. The total number of ecosystem credits required is 8 credits for Grey Box - Forest Red Gum grassy woodland on flats of the Cumberland Plain (PCT849).	The CoCs imposed 10 x ecosystem credits to be retired. Refer non-compliance against CoC B26. The updated application was submitted on 21 November 2019.	Y
Traffic and access	<p>Minor and temporary disruptions to parking, traffic and access during construction. No heavy vehicles to be parked beyond the Project boundaries.</p> <p>The analysis concluded that the surrounding road network will experience an increase in traffic in conjunction with the increased traffic movements generated by the school as it reaches capacity. The Wollondilly Development Contributions Plan indicates that Argyle Street is proposed to be upgraded to a four lane road, which is expected to largely mitigate the impacts of the increase in traffic.</p> <p>Mode share of transport of staff and students is dominated by car, with some contributions by bus.</p>	<p>All construction heavy vehicles were confined to site. Heavy vehicle movements are minor and using approved routes.</p> <p>The upgrade to Argyle Street has not occurred and, therefore, congestion is expected.</p> <p>Based on the available public transport, the mode share appears to be reasonable.</p>	Y
Noise and vibration	<p>Moderate short-term construction noise and vibration impacts on nearby receivers above the relevant Noise Management Levels and vibration criteria.</p> <p>Operational noise would comply with the Noise Policy for Industry (EPA, 2017) noise criteria and the Road Noise Policy (DECCW, 2011).</p>	<p>Several complaints were received regarding noise and work hours for the construction phase. Noise and vibration impacts are occurring but appear to be generally consistent with that predicted.</p> <p>Operational noise for plant and equipment is to be assessed following completion of Stage 3, as per the approved Staging Report.</p>	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	Y

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
		<p>Control Plan. Note that complaints were received regarding surface water entering the neighbouring yard during the major rain events in February and March 2021.</p> <p>The site is progressively rehabilitated (Stages 1 and 2 complete, Stage 3 pending).</p> <p>No fugitive dust was observed, and no dust related complaints received.</p>	
Heritage	Negligible impact on aboriginal heritage items.	<p>The Project has developed a ACHMSP, including an unexpected finds protocol. No finds have occurred to date.</p> <p>Note, however, the finding in relation to CoC C46. The Archaeological Work Method Statement for the works on the alignment of the Hume Highway (Argyle Street) was not implemented during the excavation works in that location.</p>	N
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.	<p>The contamination investigation reports indicate that sampling was carried out within the footprint and immediate surrounds existing structures, infrastructure and in ground utilities which are subject to demolition / removal. A Site Audit Statement and Site Audit Report were prepared for Stages 1 and 2 and confirms that these stages are suitable for its intended use.</p> <p>The Auditor observes that, whilst not required by this condition and deemed as low risk by the EIS, no report has been sighted to demonstrate that detailed investigations have been carried out on the open space across Stage 3 (i.e. the playing grounds).</p>	Y
Flooding and drainage	The stormwater drainage systems have been designed to cater for design storms up to and including 100 year ARI (1% AEP) storm events as per Wollondilly Shire Council DCP 2016, Design Specifications and Standard	Note that complaints were received regarding surface water entering the neighbouring yard during the major rain events in February and March 2021.	N

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
	<p>Drawings, and Water Sensitive Urban Design Technical Guidelines.</p> <p>Negligible flood risk</p>		
Waste	<p>The construction of the Project would generate general demolition and construction waste, green waste, contaminated fill, VENM and office waste.</p> <p>Operational waste would comprise general waste and comingled recycling waste.</p>	<p>The works to date would generate these types of waste.</p> <p>Records of construction waste are being retained.</p> <p>An operational waste management plan has been developed and an operational waste provider is engaged.</p>	Y
Bushfire	<p>The Project is subject to a low bushfire risk</p>	<p>The architect and Certifier have verified that design meets the requirements of the BCA with respect to fire safety. The bushfire consultant verified that the build complies with the relevant bushfire codes and standards.</p> <p>The Crown Completion Certificate verifies completion in accordance with the design.</p>	Y

4. CONCLUSIONS

This Audit Report presents the findings from the fourth Independent Audit for the construction period, also capturing pre-operational and operational requirements, covering the period from 22 June 2020 to 21 June 2021.

The overall outcome of the Independent Audit indicates that compliance is being tracked by Taylors and Mace, with some room for improvement.

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 4 June 2021. 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:

- There were 168 CoCs assessed.
- There were 13 x non-compliances identified against the CoCs. These relate to content on the website, submission of documents and notifications to the Certifier and the Department, Out of Hours Works, archaeological heritage, signage and satisfaction of Transport for NSW and content of the stormwater and landscape management plans.
- Six observations were identified in relation to the CoCs. These relate to complaints received about property impacts, submission of the dilapidation report, tree protection, implementation of recommendations from the Road Safety Evaluation and content of the operational waste management plan.
- The two previously opened observations (from the second and third Independent Audits) have been closed.

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

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APPENDIX A – SSD 8640 CONDITIONS OF CONSENT

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21																																																																																																																																											
					Stage	Phase	Action	Comment																																																																																																																																								
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 04/06/21	The Project is implementing reasonable and feasible measures to prevent or minimise harm on the environment	Compliant	All	Throughout	Note	Applies to all stages throughout development																																																																																																																																								
Terms of Consent																																																																																																																																																
A2	<p>The development may only be carried out:</p> <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 4.55 Modification Application; d) 4.55 Modification Application; e) in accordance with the approved plans in the table below: <table border="1"> <thead> <tr> <th colspan="4">Architectural Plans prepared by <i>Billard Leece Partnership</i></th> </tr> <tr> <th>Dwg No.</th> <th>Rev</th> <th>Name of Plan</th> <th>Date</th> </tr> </thead> <tbody> <tr><td>AA03-0002</td><td>B</td><td>Site Context Plan</td><td>08/01/2019</td></tr> <tr><td>SSD-AA10-0001</td><td>B</td><td>GA – Lower Ground Floor Plan – Zone A</td><td>08/01/2019</td></tr> <tr><td>SSD-AA10-0002</td><td>B</td><td>GA – Lower Ground Floor Plan – Zone B</td><td>08/01/2019</td></tr> <tr><td>SSD-AA10-0003</td><td>B</td><td>GA – Lower Ground Floor Plan – 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non-compliances were identified, these have been assigned as non-compliances against the condition to which they relate.</p> <p>There have been no written directions from the Planning Secretary.</p> <p>The project design and delivery appear to be generally consistent with the EIS and RtS except where modified under Mods 1 and 2.</p> <p>These drawings are the plans being used for the development.</p>	Compliant	All	Throughout	Note	Applies to all stages throughout development
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A3	<p>Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:</p> <p>(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</p> <p>(b) the implementation of any actions or measures contained in any such document referred to in (a) above.</p>	Interview with Auditees 04/06/21	No directions were received from the Secretary.	Not triggered	All	Throughout	Note	Applies to all stages throughout development																																																																							
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	All	Throughout	Note	Applies to all stages throughout development																																																																							
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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 7/05/19.	Works commenced 10/05/19	Compliant	All	Throughout	Note	Applies to all stages throughout development																																																																							
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.	<p>Part 6, Division 8A of the EPAR</p> <p>CC1 P217_007-2, 16/04/19</p> <p>CC2 P217_007-3, 15/07/19 (construction of Milestone 2 and 3)</p> <p>Crown Completion Certificate P217_007-3, 16/04/21 (completion of Milestone 1 and 2)</p> <p>Site inspection 04/06/21</p>	<p>Part 6, Division 8A of the EPAR relates to prescribed conditions for:</p> <ul style="list-style-type: none"> - compliance with the BCA (Crown Certificates obtained) - erection of signs (Construction site notice observed) - residential building work (not relevant) - entertainment venues (not relevant) - signage for max number of persons in venues (not relevant for construction) - shoring and adjoining properties (no properties are adjoined to the Project). 	Compliant	All	Throughout	Note	Applies to all stages throughout development																																																																							
Planning Secretary as Moderator																																																																															
A7	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either	Interview with Auditees 04/06/21	No formal disputes.	Not triggered	All	Throughout	Note	Applies to all stages throughout development																																																																							

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					Stage	Phase	Action	Comment
	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	Council PHS meeting minutes (various)	Engagement with Council is ongoing. Meeting minutes sighted. Issues discussed include changes to traffic conditions, OOHW etc. Additional matters include traffic lights (beyond scope of SSD), footpath works (s138 issued by Council and footpath works complete. Only small components of these works are part of the SSD. Other works were done as works in kind). Refer CoC B32.					
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 03/09/18	LSL levy paid.	Compliant	All	Pre-construction	Note	Applies to all stages throughout development
Legal Notices								
A9	Any advice or notice to the consent authority must be served on the Planning Secretary.	Interview with Auditees 04/06/21	No legal notices served.	Not triggered	All	Throughout	Note	Applies to all stages throughout development
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	All	Throughout	Note	Applies to all stages throughout development
Evidence of Consultation								
A11	Where conditions of this consent require consultation with an identified party, the Applicant must: a) consult with the relevant party prior to submitting the subject document for information or approval; and b) provide details of the consultation undertaken including: i. the outcome of that consultation, matters resolved and unresolved; and 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	All	Throughout	Note	Applies to all stages throughout development
Staging, Combining and Updating Strategies, Plans or Programs								
A12	With the approval of the Planning Secretary, the Applicant may: 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).	Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval)	A Staging Report was prepared in accordance with CoC A12B and was approved by the Department. This audit checklist assesses compliance with each condition in consideration of the timing specified within the approved Staging Report.	Compliant	All	Throughout	Note	Applies to all stages throughout development

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
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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)	Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (staging report approval)	A Staging Report was prepared in accordance with CoC A12B, and was approved by the Department more than one month of the commencement of the relevant stage (day 1 term 1).	Compliant	All	Throughout	Note	Applies to all stages throughout development
A12B	A Staging Report prepared in accordance with condition A12 must: (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.	Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval)	A Staging Report was prepared in accordance with CoC A12B, and was approved by the Department. This audit checklist assesses compliance with each condition in consideration of the timing specified within the approved Staging Report.	Compliant	All	Throughout	Note	Applies to all stages throughout development
A12C	Where staging is proposed, the project must be staged in accordance with the Staging Report, as approved to the Planning Secretary.	Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval)	A Staging Report was prepared in accordance with CoC A12B, and was approved by the Department. This audit checklist assesses compliance with each condition in consideration of the timing specified within the approved Staging Report.	Compliant	All	Throughout	Note	Applies to all stages throughout development
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.	Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval)	A Staging Report was prepared in accordance with CoC A12B, and was approved by the Department. This audit checklist assesses compliance with each condition in consideration of the timing specified within the approved Staging Report.	Compliant	All	Throughout	Note	Applies to all stages throughout development
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.	Plans, programs and strategies evidenced elsewhere in this Audit Table	The documents prepared address all construction stages the works being undertaken. Updates to the plans are completed in accordance with CoC C44 and C45.	Not triggered.	All	Throughout	Note	Applies to all stages throughout development
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	Plans, programs and strategies evidenced elsewhere in this Audit Table	The documents prepared address all construction stages the works being undertaken.	Not triggered.	All	Throughout	Note	Applies to all stages throughout development
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 Certifier 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, 16/04/19	The Walan demolition works plan is prepared by the demolition contractor WHS Manager details compliance with AS2601. It is complemented by work method statements. CC1 and CC2 issued by CA demonstrates compliance. Note that the construction and removal of the temporary school does not form part of the SSD.	Compliant	All	Pre-construction	Note	Applies to all stages throughout development

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
		CC2 P217_007-3, 15/7/19 (construction of Milestone 2 and 3)						
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 04/06/21 CC1 P217_007-2, 16/04/19 CC2 P217_007-3, 15/07/19 (construction of Milestone 2 and 3) Crown Completion Certificate P217_007-3, 16/04/21 (completion of Milestone 1 and 2)	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	All	Pre-construction	Note	Applies to all stages throughout development
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 04/06/21 Architectural Design Statement 08/05/19 CC2 P217_007-3, 15/7/19	The architect and CA have verified that design meets the requirements of the BCA.	Compliant	All	Pre-construction	Note	Applies to all stages throughout development
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, 15/07/19 Bushfire install advice, Peterson Bushfire, 26/02/21 Crown Completion Certificate P217_007-3, 16/04/21 (completion of Milestone 1 and 2)	The architect and CA have verified that design meets the requirements of the BCA. The bushfire consultant verified that the build satisfies this condition. The Crown Completion Certificate verifies completion in accordance with the design.	Compliant	All	Pre-construction	Note	Applies to all stages throughout development
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, 15/07/19 Bushfire install advice, Peterson Bushfire, 26/02/21 Crown Completion Certificate P217_007-3, 16/04/21 (completion of Milestone 1 and 2)	The electrical engineer and CA have verified that design meets the requirements of the BCA. The bushfire consultant verified that the build satisfies this condition. The Crown Completion Certificate verifies completion in accordance with the design.	Compliant	All	Pre-construction	Note	Applies to all stages throughout development
Applicability of Guidelines								

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
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	All	Throughout	Note	Applies to all stages throughout development
Monitoring and Environmental Audits								
A21	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, noncompliance notification, compliance reporting and independent auditing. <i>Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i>	Part 9, Div 9.4 of the EPAA Vibration Monitoring Report, GHD, March 21 and email GHD to Taylor 04/06/21 Asbestos investigation report, JBS&G, 15/02/21 Asbestos clearance report, Greencap, 14/11/20	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. Vibration monitoring has been undertaken on the northern boundary. Monitoring appears to be consistent with the relevant standard. Results satisfactory. Asbestos investigations and monitoring carried out indicate that the process followed the relevant standards, with records available. This Audit has been carried out with regard to these requirements, ISO 19011 and IAPAR.	Compliant	All	Throughout	Note	Applies to all stages throughout development
Access to Information								
A22	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: a) make the following information and documents (as they are obtained or approved) publicly available on its website: 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 b) keep such information up to date, to the satisfaction of the Planning Secretary.	https://www.schoolinfrastructure.nsw.gov.au/projects/p/picton-high-school.html	The website contains the information identified in CoC A22 a)(i)-(x) with the exception of that specified below. Non-compliance: The website does not contain the current complaints register.	Non-Compliant	All	Pre-construction	Note	Applies to all stages throughout development
Compliance								
A23	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development	TBT December 20 – June 2021 SE-F-11 Induction form and agenda. SE-F-20 additional induction items	Toolbox talks are being carried out regularly, which communicate risk and controls and relevant requirements of the consent and environment and community issues such as parking, soil and water, Induction support material includes environmental and compliance matters. Persons must pass a test prior to acceptance.	Compliant	All	Throughout	Note	Applies to all stages throughout development

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
		Hammertech induction system Contractor selection criteria checklist (various)	Contractor selection criteria checklist includes provision of Environmental Management Plans					
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 1545920, 1545928,	Road occupancy licences have been obtained for Wonga Rd and Argyle St works.	Compliant	All	Throughout	Note	Applies to all stages throughout development
PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION								
Notification of Commencement								
B1	The Department must be notified in writing of the dates of commencement of physical work and operation at least 48 hours before those dates. If the construction or operation of the development is to be staged, the Department must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Notice of commencement under CoC B1 submitted 18/04/19 and again on 16/07/19	Works commenced 10/05/19. Notification of milestone 1 provided 18/04/19. Subsequent notification on 16/07/19 notified for milestones 2 and 3 well before commencement of these works.	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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: a) the relevant clauses of the BCA; and b) this development consent.	DPIE approval of initial Staging Report 7/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) Structural certificate 05/04/19 CC2 P217_007-3, 15/07/19	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	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
External Walls and Cladding								
B3	Prior to the commencement of construction, the Applicant must provide the Certifier 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 Certifier to the Planning Secretary within seven days after the Certifier accepts it.	DPIE approval of initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) Design statement 08/05/19 CC2 P217_007-3, 15/07/19	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	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
		Submission to DPIE 11/06/19						
Landscaping								
B4	<p>Prior to the commencement of construction, the Applicant must</p> <ol style="list-style-type: none"> 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. Revise the landscape plan to include soft landscaping on either side of the proposed security fence. 	<p>DPIE approval of initial Staging Report 07/05/19.</p> <p>Initial Staging Report 18/04/19</p> <p>Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20</p> <p>Letter DPIE to SINSW, 16/12/20 (Staging Report approval)</p> <p>Updated landscape plan CC2 P217_007-3, 15/07/19</p> <p>Submission to DPIE 07/06/19.</p>	<p>The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.</p> <p>The architect and CA have verified this as compliant. The information was provided to DPIE.</p>	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
B5	<p>The revised landscape plan must be submitted to the Planning Secretary and the Certifier for information.</p>	<p>DPIE approval of initial Staging Report 07/05/19.</p> <p>Initial Staging Report 18/04/19</p> <p>Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20</p> <p>Letter DPIE to SINSW, 16/12/20 (Staging Report approval)</p> <p>Updated landscape plan CC2 P217_007-3, 15/07/19</p> <p>Submission to DPIE 07/06/19.</p>	<p>The Project is currently planned to be delivered in two stages. The condition applies to Stage 2.</p> <p>The architect and CA have verified this as compliant. The information was provided to DPIE.</p>	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Protection of Public Infrastructure								
B6	<p>Before the commencement of construction, the Applicant must:</p> <ol style="list-style-type: none"> <u>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; Prior to the commencement of construction works associated with the construction of the car park adjacent to the northern boundary of the site, the Applicant is to engage a qualified structural engineer to prepare a pre-construction dilapidation report and submit it to Council and the Certifier. The report must provide an accurate record of the existing condition of adjoining private properties, as detailed in the Applicant's letter dated 24 March 2021 submitted in support of modification SSD-8640-Mod-1, that are likely to be impacted by construction works associated with the construction of the car park adjacent to the northern boundary of the site.</u> prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and submit a copy of the dilapidation report to the Certifier and Council. 	<p>Dilapidation reports 190215 and 090314</p> <p>Submission to Council and CA 190417</p> <p>CC1 P217_007-2, 16/04/19</p> <p>Dilapidation report (file of folders), Bonacci, 31/03/21</p> <p>Email MACE to Council, 16/06/21 (submission of dilapidation report for northern boundary works)</p> <p>Email Taylor to Certifier MACE to Council, 16/06/21 (submission of dilapidation report for northern boundary works)</p>	<p>No service provider services impacted.</p> <p>Dilapidation reports undertaken and submitted to relevant stakeholders.</p> <p>The Bonacci structural engineer prepared the dilapidation report on 31/03/21. The works commenced in April 2021.</p> <p>Non-compliance: Dilapidation reports prepared for the north boundary works were not submitted to the identified stakeholders prior to the commencement of construction of the relevant works. The reports were submitted to the stakeholders on 16/06/21 (after the Independent Audit site inspection).</p>	Non-compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Unexpected Contamination Procedure								

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
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	The unexpected finds procedure is included in the CEMP and is being implemented on site.	Compliant	Stage 2	Throughout	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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 04/06/21 Sec73 permit for OSD TIR669118. Sydney Water approval to build over asset dated 21/04/20 Certification of design package, Endeavour, 13/07/18.	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	Stage 2	Prior to construction of utility works	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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 04/06/21 Certification of design package, Endeavour, 13/07/18.	The substation was approved by endeavour energy in 2018 prior to its construction (2019).	Compliant	Stage 2	Prior to construction of utility works	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Community Communication Strategy								
B10	A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication between the Applicant, Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction. The Community Communication Strategy must: a) identify people to be consulted during the design and construction phases; b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; d) set out procedures and mechanisms: i. through which the community can discuss or provide feedback to the Applicant; ii. through which the Applicant will respond to enquiries or feedback from the community; and 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. The Community Communication Strategy must be submitted to the Planning Secretary for approval no later than two weeks before the commencement of any work.	Community Communication Strategy Picton High School redevelopment, April 2019 DPIE Approval of Community Communications Strategy 05/04/19	The Strategy has been prepared in accordance with the condition and approved by DPIE.	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
	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.							
Ecologically Sustainable Development								
B11	Prior to the commencement of construction, the Applicant must submit details of all design measures to the satisfaction the Certifier 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.	DPIE approval of initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) CC2 P217_007-3, 15/7/19 Correspondence from CA 04/06/19 Architect design statement 30/05/19. Modification 1	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The architect and Certifier confirm this is compliant following approval of Modification 1.	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Outdoor Lighting								
B12	Prior to commencement of construction, all outdoor lighting within the site must comply with AS 1158.3.1:2005 Lighting for roads and public spaces- Pedestrian area (Category P) lighting - Performance and design requirements and AS 4282-1997 Control of the obtrusive effects of outdoor lighting. Details demonstrating compliance with these requirements must be submitted to the satisfaction of the Certifier	DPIE approval of initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) Northrop design statement 10/05/19. 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 Certifier have verified this as being compliant	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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 Certifier 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 initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) Design compliance statement 05/04/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The architect and Certifier have verified this as compliant	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
		CC2 P217_007-3, 15/7/19						
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 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, 16/05/18. (BfMP)</p> <p>Waste Management Plan Picton High School Redevelopment, SMEC, 27/02/19 (CWMSP)</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	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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; 	<p>Construction Environmental Management Plan Picton High School, SMEC, 05/04/19 (CEMP), and updates 20/01/20 and 02/03/20.</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</p>	<p>The CEMP has been prepared and approved by the Certifier.</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	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
	<ul style="list-style-type: none"> 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>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, 16/05/18. (BfMP)</p> <p>Waste Management Plan Picton High School Redevelopment, SMEC, 27/02/19 (CWMSP)</p>						
B16	The Applicant must not commence construction of the development until the CEMP is approved by the Certifier and a copy submitted to the Planning Secretary.	<p>CC1 P217_007-2, 16/4/19</p> <p>Submission of CEMP to Planning Secretary 16/4/19</p> <p>Submission of updated CEMP to Planning Secretary 10/03/20 and PCA on 12/06/20</p>	<p>The Certifier approved the CEMP and it was submitted to DPIE on 16/04/19.</p> <p>Construction commenced 10/05/19.</p>	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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 Reports 1, 2 and 3 regarding the adequacy and development of the plan.</p>	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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; 	<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 Reports 1, 2 and 3 regarding the adequacy and development of the plan.</p>	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
	<ul style="list-style-type: none"> 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. 							
B19	<p>The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; (b) removal of hazardous materials including asbestos, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works. 	<p>Waste Management Plan Picton High School Redevelopment, SMEC, 27/02/19 (CWMSP)</p> <p>Project waste register</p> <p>ACM Blacktown Waste EPL11497, dial a dump EPL 13426, Wallan truck dockets and waste tracking forms 01/06/19, Genesis Eastern Creek tip dockets 01/06/19.</p>	<p>The CWMSP has been prepared and approved by the PCA.</p> <p>Refer to Independent Audit Reports 1, 2 and 3 regarding the adequacy and development of the plan.</p>	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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 Reports 1, 2 and 3 regarding the adequacy and development of the plan.</p>	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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 Reports 1, 2 and 3 regarding the adequacy and development of the plan.</p>	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Construction Parking								
B22	<p>Prior to the commencement of construction, the Applicant must provide sufficient parking facilities for heavy vehicles on-site (unless alternative parking is agreed to in writing from the relevant road authority) and ensure that construction traffic associated with the development minimises on-street parking or the use of public parking facilities.</p>	<p>Construction Traffic and Pedestrian Management Plan, Stantec, V1, 04/04/19, and V3 18/11/19 (CTPMSP)</p> <p>Waste Management Plan Picton High School Redevelopment, SMEC, 27/02/19 (CWMSP)</p> <p>Site inspection 04/06/21</p>	<p>The project contains sufficient space for HV parking and movements internal to the site, or at the contractor car park.</p>	Compliant	Stage 2	Throughout	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Road Design and Traffic Facilities								
B23	<p>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.</p>	<p>Interview with Auditees 04/06/21</p> <p>Site inspection 04/06/21</p> <p>S138 201.2019.00000024.001 (Wonga Rd)</p>	<p>The Project obtained the necessary road works permits (S138) from Council for works on Wonga Road and Argyle Street prior to their commencement. The s138 refers to the approved design plans to be constructed. ROLs were also obtained to enable the works to be constructed.</p>	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation

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		S138 201.2020.00000068.001 (Argyle St) ROL 1545920, 1545928 Certificate of Completion, Council, 201.2020.00000068.001 (Argyle St) Certificate of Completion, Council, 201.2019.00000024.001 (Wonga Rd)	Completion certificates were issued by Council.					applied to the entire development
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 Certifier. The system must: (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 initial Staging Report 07/05/19. Initial Staging Report 18/4/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) Design statement 29/03/19 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 Certifier have verified this as compliant	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Operational Noise-Design of Mechanical Plant and Equipment								
B25	Prior to commencement of construction, the Applicant must incorporate the noise mitigation recommendations in the <i>Acoustic Assessment Report 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 Certifier 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 initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) 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 Certifier have verified this as being compliant	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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 it 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 2019. 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	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development

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					Stage	Phase	Action	Comment
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	Stage 2	Throughout	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Operational Waste Storage and Processing								
B28	Prior to the commencement of construction, the Applicant must obtain agreement from Council for the design of the operational waste storage area where waste removal is undertaken by Council.	DPIE approval of initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) Correspondence from Council on operational waste management plan 22/03/19	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	Stage 2	Throughout	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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 Certifier prior to the commencement of construction.	DPIE approval of initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) Mechanical services design statement 03/04/19 CC2 P217_007-3, 15/07/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The mechanical engineer and Certifier have verified this as being compliant	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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 initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval)	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The hydraulic engineer and Certifier have verified this as being compliant	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
		Hydraulic Services Statement of Compliance 03/04/19 CC2 P217_007-3, 15/07/19						
Roadworks and Access								
B31	Prior to the commencement of construction, the Applicant must submit design plans to the satisfaction of the Certifier 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 initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) Statement from bushfire consultant 18/01/19	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	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
B32	Prior to the commencement of construction, the Applicant must prepare plans in consultation with Council to include: (a) a plan (including swept path analysis) for the Argyle Street bus bay that allows for buses to 'leap frog', avoid conflict with other buses and prevent queuing on Argyle Street; (b) signage and line-markings for the proposed changes to the Argyle Street kerb-side parking restrictions; and (c) design details for the Wonga Road extension including bus bays. The Applicant must obtain approval for the works under section 138 of the Roads Act 1993. Plans must be submitted to the satisfaction of Planning Secretary.	DPIE approval of initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) DPIE letter of approval of plans for Argyle Street and Wonga Road, 23/08/19 Swept Path analysis 29/03/19 Leap frog analysis 05/04/19 Sign post plan, May 2019 Wonga Road Sign Post, Oct 2018.	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The plans with accompanying information were submitted to DPIE for approval. They were approved on 23/08/19. Refer also response to CoC B23. Note that additional works in relation to these matters are being requested by Council, however these proposed works do not form part of the SSD.	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
B33	Prior to the commencement of construction, the Applicant must prepare an updated Road Safety Evaluation (RSE) as per the NSW Centre for Road Safety Guidelines for Road Safety Audit Practices and Austroads Guide to Road Safety Part 6: Road Safety Audit) for all relevant sections of road utilised for bus and private vehicle pick-up and drop-off in consultation with Council. The Applicant must submit the plans to Planning Secretary for information.	DPIE approval of initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Road Safety Evaluation Report, TTP, 05/06/19. Submission to DPIE 05/07/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The evaluation was undertaken and submitted to DPIE for information on 05/07/19. Refer response to CoC D11.	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Car Parking and Service Vehicle Layout								
B34	Compliance with the following requirements must be submitted to the satisfaction of the Planning Secretary prior to the commencement of construction: (a) all vehicles must enter and leave the Site in a forward direction;	DPIE approval of initial Staging Report 07/05/19. Initial Staging Report 18/04/19	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	Stage 2	Throughout	Note	This condition has been satisfied prior to any staging and the submitted

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
	(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	Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) DPIE Letter of approval 05/09/19						documentation applied to the entire development
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 Certifier prior to the commencement of construction: <ol style="list-style-type: none"> the provision of a minimum 27 bicycle parking spaces; the provision of 4 motorcycle parking spaces; 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; the provision of end-of-trip facilities for staff in accordance with the ESD Design & As Built rating tool; appropriate pedestrian and cyclist advisory signs are to be provided; and all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority. 	DPIE approval of initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) Arcadia end of trip plans 17-424 CC2 P217_007-3, 15/07/19	The Project is currently planned to be delivered in two stages. The condition applies to Stage 2. The Certifier has verified this as being compliant.	Compliant	Stage 2	Pre-commencement	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Public Domain Works								
B36	Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifier 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 Certifier.	Site inspection 04/06/21 Stamped plans for Wonga Road 190529 Consultation records with Council 28/11/18 – 29/05/19 CC1 P217_007-2, 16/04/19 CA email dated 15/07/19 CA email dated 19/12/19	Sighted design and consultation records for Wonga Road works. The Certifier has provided satisfaction.	Compliant	Stage 2	During Construction	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
Compliance Reporting								
B37	No later than two weeks before the date notified for the commencement of construction, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department and the Certifier. Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018). The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the Certifier in writing at least seven days before this is done.	Compliance program 09/04/19 and submission correspondence 16/04/19 CCR3, October 2020 DPIE post approval portal 06/11/20 (CCR3 submission) CCR4, March 2021 DPIE post approval portal 15/04/21 (CCR4 submission) Pre-Ops CR1, 16/04/21 Pre-Ops CR2, 16/04/21	The program was submitted >2 weeks prior to construction. CCR3, CCR4, Pre-Ops CR1 and Pre-Ops CR2 were prepared and addressed the requirements of the CRPAR. The submission to the Department included notice that these would be published on the Project website. Non-compliance: CCR3 had not been published on the Project website until after the Independent Audit site inspection. The Certifier was not notified of the publication of CCR3, CCR4, Pre-Ops CR1 and Pre-Ops CR2 until after the Independent Audit site inspection.	Non-compliant	All	Operation	Note	The Compliance Monitoring and Reporting Program was submitted prior to staging and compliance reporting will be carried out in accordance with the PARs 2018 and each compliance report will be made publicly available

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
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		DPIE post approval portal 19/04/21 (Pre-Ops CR1 and CR2 submission) Email Mace to Certifier 21/06/21 (publication of CCR3, CCR4, Pre-Ops CR1 and Pre-Ops CR2).						60 days after submission to DPIE.
B38	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance	Site inspection 04/06/21	The project is in construction	Not triggered	All	Operation	Note	Not triggered until all Stages operational
Sydney Water Approval								
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 Certifier prior to works commencing. Please refer to the Sydney Water Tap in™ website for details.	DPIE approval of initial Staging Report 07/05/19. Initial Staging Report 18/04/19 Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval) Interview with Auditees 02/06/20 Sec73 permit for OSD TIR669118. Sydney Water approval to build over asset dated 21/04/20.	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	Stage 2	During Construction	Note	This condition has been satisfied prior to any staging and the submitted documentation applied to the entire development
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 Certifier.	Site inspection 04/06/21 Aconex file (plans available).	All certified plans and documents were readily available on site. Aconex used for storage of documentation.	Compliant	All	Construction	Note	Applies to all stages of construction.
Site Notice								
C2	A site notice(s): (a) must be prominently displayed at the boundaries of the site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifier and Structural Engineer. (b) is to satisfy all but not be limited to, the following requirements: i. minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size; ii. the notice is to be durable and weatherproof and is to be displayed throughout the works period; iii. the approved hours of work, the name of the site/ project manager, the responsible managing company (if any), its address and 24-hour contact	Site inspection 04/06/21	Sighted site notices. They satisfied the requirements of this condition	Compliant	All	Construction	Note	Applies to all stages of construction.

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	iv. phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and 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.							
Operation of Plant and Equipment								
C3	All plant and equipment used on site, or to monitor the performance of the development must be: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner	Mobile plant inspection checklists Kubota 8t excavator, Liebherr 50tonne crane, including risk assessments and service records Driver induction records including licence and ticket check. Hammertech equipment induction system. SWMS Asbestos removal 03/06/21, demolition 17/04/21	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. 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	All	Construction	Note	Applies to all stages of construction.
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 Certifier before the commencement of works.	Demolition SWMS 6767 Demolition sequence 181019 Walan demolition works plan 08/04/19 PJA demolition works SWMS, 17/04/21 Tree removal plans 190404 AA020001 CC1 P217_007-2, 16/04/19 CC2 P217_007-3, 15/07/19 (construction of Milestone 2 and 3)	The demolition works plan are prepared by the demolition contractor WHS Manager details compliance with AS2601. It is complemented by safe work method statements. CC1 and CC2 issued by CA	Compliant	All	Construction	Note	Applies to all stages of construction.
Construction Hours								
C5	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7:00 am and 6:00 pm, Mondays to Fridays inclusive; and (b) between 8:00 am and 1:00 pm, Saturdays. No work may be carried out on Sundays or public holidays.	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP) Present in subcontracts. Present in the SE-F-20 induction forms Weekly subcontractor meeting 06/07/20, 21/12/20, 22/02/21, 01/03/21 Complaints register current to May 2021	The hours are regularly communicated to personnel and are present in project documentation. Subcontract meeting minutes include storage of fuels, labelling, noise control, hours of work, cleaning of departing trucks, subcontractor parking. 2 x complaints received during the audit period relating to construction hours. This related to workers arriving at site (rather than undertaking works) and extended days being used pursuant to the COVID work days order.	Compliant	All	Construction	Note	Applies to all stages of construction.

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
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 04/06/21</p> <p>Night works permit on Argyle Road (drainage, line marking and island construction), relating to S138 201.2020.00000068.001 (Argyle St)</p> <p>https://www.schoolinfrastructure.nsw.gov.au/projects/p/picton-high-school.html#category-works-notifications</p>	<p>Non-compliance: OOHW was completed during April as part of Argyle Street upgrade works. It is understood that drainage, line marking and construction of the island were all approved by Council to occur during the evening and night time periods; however, only line marking went ahead during the OOH period (up to approx. 10pm). It is the Auditor's opinion that these works would not be inaudible at the nearest receiver and the works do not conform to the requirements of C6 a) – d). That being said, notification was provided to potentially affected residents prior.</p> <p>No other out of hours works have occurred, other than additional day time works under the COVID Order.</p>	Non-compliant	All	Construction	Note	Applies to all stages of construction.
C7	<p>Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:</p> <ul style="list-style-type: none"> (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. 	<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 the SE-F-20 induction forms</p> <p>Interview with auditees 04/06/21</p>	<p>The intra-day respite periods have been communicated to personnel and are present in project documentation.</p> <p>No high impact noise activities have been undertaken.</p>	Compliant	All	Construction	Note	Applies to all stages of construction.
Implementation of Management Plans								
C8	<p>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>	<p>Documents referred to elsewhere in this Audit Table</p> <p>Site inspection 04/06/21</p> <p>CEMP, 05/04/19, (inc Taylor PEMP, E-PLAN-03 (Rev. April 2019)) and updates 20/01/20 and 02/03/20</p> <p>HSE inspection checklists 03/06/21, 31/03/21, 03/03/21, 13/01/21, 18/12/20</p> <p>WHS site inspection 28/04/21</p> <p>PHS internal audit record, 01/06/21</p> <p>Incident Register 24/10/19 – current</p> <p>Taylor site induction checklist</p> <p>Taylor Traffic Control Plan – stage 3 round about works May 2019.</p> <p>Pre & Post Rain Event Inspection List, 16/03/21 and 25/03/21</p>	<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.</p> <p>Inspection regime checks items relating to housekeeping, soil and water, waste, security, operation of plant and equipment, etc.</p> <p>Incidents are identified, investigated and actioned.</p>	Compliant	All	Construction	Note	Applies to all stages of construction.
Construction Traffic								
C9	<p>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>	<p>Construction Traffic and Pedestrian Management Plan,</p>	<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.</p>	Compliant	All	Construction	Note	Applies to all stages of construction.

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		Stantec, V1, 04/04/19, and V3 18/11/19 (CTPMSP) Waste Management Plan Picton High School Redevelopment, SMEC, 27/02/19 (CWMSP) Site inspection 04/06/21	Worker parking is also available at the contractor car park as shown in the CTPMSP.					
Road Occupancy License								
C10	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	S138 201.2019.00000024.001 (Wonga Rd) S138 201.2020.00000068.001 (Argyle St) ROL 1545920, 1545928 Certificate of Completion, Council, 201.2020.00000068.001 (Argyle St) Certificate of Completion, Council, 201.2019.00000024.001 (Wonga Rd)	A road occupancy licence was obtained by the Project for Wonga Road and Argyle Street works. Works were complete as per Council requirements.	Compliant	All	Construction	Note	Applies to all stages of construction.
SafeWork Requirements								
C11	To protect the safety of work personnel and the public, the work site must be adequately secured to prevent access by unauthorised personnel, and work must be conducted at all times in accordance with relevant SafeWork requirements.	Site inspection 04/06/21 Safework NSW Inspection Report, 18/05/21 SWMS Asbestos removal 03/06/21, demolition 17/04/21 TBT December 20 – June 2021 Weekly subcontractor meeting 06/07/20, 21/12/20, 22/02/21, 01/03/21 PJA Productions notice to SafeWork of removal of non-friable asbestos 28/05/21 – 26/06/21. PJA Asbestos removal licence current 24/10/23	The site is suitably secured to prevent third party access. Project HSE risks are toolboxed, with controls and rules identified for implementation. SafeWork NSW attended the site on 18/05/21. No issues were observed by the inspector. SWMS are prepared and maintained on system. They identify methods and risks (including environmental where relevant) and controls, relevant codes, sign on and authorisation. Subcontract meeting minutes include storage of fuels, labelling, noise control, hours of work, cleaning of departing trucks, subcontractor parking. Toolbox talks include discussion on environmental issues including dewatering, concrete management, traffic and access.	Compliant	All	Construction	Note	Applies to all stages of construction.
Hoarding Requirements								
C12	The following hoarding requirements must be complied with: (a) no third-party advertising is permitted to be displayed on the subject hoarding/fencing; (b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application; and (c) the Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.	Site inspection 04/06/21	No hoarding on third party property. No b class hoarding required. Hoarding was free of advertising and graffiti.	Compliant	All	Construction	Note	Applies to all stages of construction.

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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.	Weekly subcontractor meeting 06/07/20, 21/12/20, 22/02/21, 01/03/21 Site inspection 04/06/21	There were no obstructions to public access observed. The need to maintain access is communicated to workforce. No complaints regarding obstruction of public way.	Compliant	All	Construction	Note	Applies to all stages of construction.
Construction Noise Limits								
C14	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP) Hours of works present in the SE-F-20 induction forms for all staff. Site inspection 04/06/21 Weekly subcontractor meeting 06/07/20, 21/12/20, 22/02/21, 01/03/21 Complaints register current to May 2021	The need to minimise noise impacts is identified in Project documentation and is communicated to the workforce. Hoarding is in place. Signage on site directs people to respect neighbours. Non-tonal beepers are fitted to some long-term plant (where safe to do so). No noise issues have been raised by the school that have required special noise mitigation. Weekly subcontract meeting minutes include storage of fuels, labelling, noise control, hours of work, subcontractor parking. 3 x complaints were received regarding noise (comprising hours, COVID days and new plant). The responses provided by the project to address these matters are considered adequate.	Compliant	All	Construction	Note	Applies to all stages of construction.
C15	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C5.	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP) Hours of works present in the SE-F-20 induction forms for all staff. Weekly subcontractor meeting 06/07/20, 21/12/20, 22/02/21, 01/03/21 Complaints register current to May 2021	The hours are regularly communicated to personnel and are present in project documentation. Weekly subcontract meeting minutes include storage of fuels, labelling, noise control, hours of work, subcontractor parking. 3 x complaints were received regarding noise (comprising hours, COVID days and new plant). The responses provided by the project to address these matters are considered adequate.	Compliant	All	Construction	Note	Applies to all stages of construction.
C16	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use audible movement alarms of a type that would minimise noise impacts on surrounding noise sensitive receivers	Interview with Auditees 04/06/21 Complaints register current to May 2021 Video file 07/06/21	Non-tonal beepers are fitted to long term plant. No complaints regarding this requirement received during the audit period.	Compliant	All	Construction	Note	Applies to all stages of construction.
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	All	Construction	Note	Applies to all stages of construction.
Vibration Criteria								

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C18	Vibration caused by construction at any residence or structure outside the site must be limited to: (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 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 Report, GHD, March 21 and email GHD to Taylor 04/06/21	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. Vibration monitoring has been undertaken on the northern boundary. Monitoring appears to be consistent with the relevant standard. Results satisfactory. Observation: 1 x complaint was received in April 2021 regarding cracks on a resident's property. The complainant attributed this to piling works. The auditees advise that piling works were completed in 2018-19 (i.e. not during the period relating to the complaint) and were at material distance from the property with existing buildings in between the piling and the receiver.	Compliant	All	Construction	Note	Applies to all stages of construction.
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 Report, GHD, March 21 and email GHD to Taylor 04/06/21	Vibration monitoring has been undertaken on the northern boundary despite the fact that vibratory rollers were not used for these works. Monitoring appears to be consistent with the relevant standard. Results satisfactory.	Not triggered	All	Construction	Note	Applies to all stages of construction.
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 B18 of this consent.	Picton High School 480 Argyle Street Picton Construction Noise and Vibration Management Plan, Acoustic Logic, Rev0, 05/03/19, and V2 06/11/19 (CNVMSP) Vibration Monitoring Report, GHD, March 21 and email GHD to Taylor 04/06/21	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	All	Construction	Note	Applies to all stages of construction.
Detailed Site Investigation								
C21	Following the relocation or demolition of any existing structures, infrastructure and in ground utilities, the Applicant is to carry out further investigation of soil contamination (including within the footprint and immediate surrounds of those structures, infrastructures and utilities prior to undertaking any construction) to address any contamination with regard to the following: a. NSW EPA Sampling Design Guidelines; b. Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017; c. Guidelines for Consultants Reporting on Contamination Sites, 2011; and d. The National Environment Protection (Assessment of Contamination) Measure.	Report on building footprint contamination investigation, Douglas Partners, 22/11/19 Douglas Partners in situ waste classification report 21/01/19 and 25/7/19 Stage 3 Preliminary Asbestos Investigation, JBS&G 15/02/21 Investigation summary report, Building K, Douglas Partners, 31/05/21	A Detailed Site Investigation was carried out across the site where the relocation or demolition of any existing structures, infrastructure and in ground utilities. This was coupled with an in-situ waste classification report. The Detailed Site Investigation concluded that with the excavations completed in preparation for works the site is suitable for its intended use as a school. Refer to CoC D33 regarding the need or relevance of that condition. Observation: The contamination investigation reports indicate that sampling was carried out within the footprint and immediate surrounds existing structures, infrastructure and in ground utilities which are subject to demolition / removal. The Auditor observes that, whilst not required by this condition and deemed as low risk by the EIS, no report has been sighted to demonstrate that detailed investigations have been carried out on the open space across Stage 3 (i.e. the playing grounds).	Compliant	All	Construction	Note	Applies to all stages of construction.
Tree Protection								
C22	For the duration of the construction works: (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;	Interview with auditees 04/06/21 Site inspection 04/06/21	No street trees had been pruned or removed. Observation: The arboricultural reports sighted do not appear to have assessed the trees along the eastern	Observation	All	Construction	Note	Applies to all stages of construction.

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
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	<p>(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;</p> <p>(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; as amended by the letter prepared by Horticultural Management Services dated 16 October 2019; and</p> <p>(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>		<p>boundary between the fence line and future playing grounds and, therefore, are not specific on the need for protection of these specimens (or otherwise). During the inspection it was observed that the trees along the eastern boundary of Stage 3 works, between the fence line and future playing grounds are to be retained and are not protected. The Auditor also observes that there were minimal works evident within the area considered to be the tree protection zone (12 x trunk dia. measured at breast height).</p>					
Dust Minimisation								
C23	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	<p>Site inspection 04/06/21</p> <p>SE-F-20 induction forms for all staff.</p> <p>Complaints register current April 2021</p>	<p>To note, the dust risk over the previous year has decreased from previous audit periods due to the type of works being undertaken (structure and fit out of Milestone 2, and investigations for Milestone 3) and weather conditions (the presence of La Nina and increased rainfall).</p> <p>Dust risk and control is communicated to Project personnel.</p> <p>Hoses and sprinklers were available during demolition. Project had a water cart available during dry conditions and earthworks.</p> <p>Prior to completion of Milestone 2 boundary misting was placed along the northern boundary.</p> <p>No complaints received regarding dust during the audit period.</p>	Compliant	All	Construction	Note	Applies to all stages of construction.
C24	<p>During construction, the Applicant must ensure that:</p> <p>(a) exposed surfaces and stockpiles are suppressed by regular watering;</p> <p>(b) all trucks entering or leaving the site with loads have their loads covered;</p> <p>(c) trucks associated with the development do not track dirt onto the public road network;</p> <p>(d) public roads used by these trucks are kept clean; and</p> <p>(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</p>	<p>Site inspection 04/06/21</p> <p>SE-F-20 induction forms for all staff.</p> <p>Complaints register current April 2021</p> <p>JBS&G supervision of stockpile removal 09-1103/21</p> <p>Streetsweeper invoices, 23/02/21, 25/02/21, 26/02/21</p>	<p>To note, the dust risk over the previous year has decreased from previous audit periods due to the type of works being undertaken (structure and fit out of Milestone 2, and investigations for Milestone 3) and weather conditions (the presence of La Nina and increased rainfall).</p> <p>Dust risk and control is communicated to Project personnel.</p> <p>Spoil removal works supervised by JBS&G include photos of trucks fitted with roll-on roll-off covers in use.</p> <p>Hoses and sprinklers were available during demolition. Project had a water cart available during dry conditions and earthworks.</p> <p>Prior to completion of Milestone 2 boundary misting was placed along the northern boundary.</p> <p>Site access and egress is stabilised. No material tracking issues observed. A streetsweeper is engaged to clean streets where required.</p> <p>Land stabilisation works have occurred progressively in accordance with the construction stages.</p>	Compliant	All	Construction	Note	Applies to all stages of construction.
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	All	Construction	Note	Applies to all stages of construction.

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Erosion and Sediment Control								
C26	All erosion and sediment control measures, must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment.	<p>Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP)</p> <p>Site inspection 04/06/21</p> <p>Project ERSED Plan 19/04/21</p> <p>Email Bonacci to Taylor, 16/06/21 (sign off of current ERSED plan)</p> <p>TBT December 20 – June 2021</p> <p>Picton HS Civil Design Intent, 27 Coachwood Crescent, Bonacci, 16/03/21</p>	<p>An erosion and sediment control plan (ERSED 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> <p>Observation: The ERSED plan was updated by Taylor for Stage 3 in April 2021, however this was only signed off by the Project civil engineer as being appropriate after the Independent Audit site inspection.</p> <p>Observation: 3 x complaints were received during the audit period regarding water on an adjacent property. These were received during the large storm events in February and March 2021. The ERSED plan for that time indicates that sediment fence was in place on the boundary and that the operational stormwater network was connected. An investigation was conducted by the Project which indicates that water could have entered the property. SINSW consider the issue closed. No further issues have been raised.</p>	Compliant	All	Construction	Note	Applies to all stages of construction.
Imported Soil								
C27	<p>The Applicant must:</p> <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 Certifier upon request. 	<p>Interview with Auditees 04/06/21</p> <p>Contamination Summary Letter, Douglas Partners, 19/03/21</p> <p>Data Gap assessment, Douglas Partners, 13/04/21</p> <p>Site Audit Report and Site Audit Statement, Stages 1 and 2, Ramboll, 16/04/21</p>	<p>Imported material assessments are summarized in Section 5 of the Douglas Partner's Contamination Summary Letter. It determined that the material imported was considered VENM. Test reports to support the classifications are listed.</p> <p>The Contaminated Site Auditor confirmed Douglas Partners' assessment.</p>	Compliant	All	Construction	Note	Applies to all stages of construction.
Disposal of Seepage and Stormwater								
C28	Any seepage or rainwater collected on-site during construction or groundwater must not be pumped to the street stormwater system unless separate prior approval is given in writing by the EPA in accordance with the Protection of the Environment Operations Act 1997.	<p>Site inspection 04/06/21</p> <p>Construction Soil and Water Management Sub-Plan Picton High School Redevelopment, SMEC, April 2019 (CSWMSP)</p> <p>Interview with Auditees 04/06/21.</p> <p>Suresearch invoice, 08/03/21</p>	The Project has not needed to pump water offsite. The ERSED controls in the ERSED plan are passive. Some dewatering was completed during investigations and the water was disposed by sucker truck to liquid.	Not triggered	All	Construction	Note	Applies to all stages of construction.
Unexpected Finds Protocol – Aboriginal 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	<p>Site inspection 04/06/21</p> <p>Interview with Auditees 04/06/21</p>	There were no unexpected finds reported during the audit period.	Not triggered.	All	Construction	Note	Applies to all stages of construction.

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	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.							
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 04/06/21 Complaints register current to May 2021	Waste is segregated and stored in skip bins. The site is generally tidy, considering that demolition works were in process. No waste beyond the boundary was observed. No complaints regarding this requirement were received during the audit period.	Compliant	All	Construction	Note	Applies to all stages of construction.
C32	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	Waste Management Plan Picton High School Redevelopment, SMEC, 27/02/19 (CWMSP) Interview with Auditees 04/06/21 Site inspection 04/06/21 BINGO monthly waste report, April 20 - May 2021 BINGO Waste Management and Recycling Plan (no date) Stockpile Waste Classification Report, Douglas Partners, 05/03/21 Site Audit Report and Site Audit Statement, Stages 1 and 2, Ramboll, 16/04/21	BINGO monthly waste report identifies the materials collected, the recycling breakdown (>90% recycled). BINGO management plan identifies disposal destination (including EPL) numbers. All material is pre-classified under the Waste Classification Guidelines. Waste classification report for excavated material sighted. The report includes copies of the disposal docketts. The material, GSW, was directed to Brandown quarries in Kemps Creek. Waste classification and disposal for Milestone 1 and 2 was assessed by the Contaminated Sites Auditor in Section 8.4 and 12.4 of the Site Audit Report. The Auditor determined classification and disposal to be adequate.	Compliant	All	Construction	Note	Applies to all stages of construction.
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.	JBS&G supervision of stockpile removal 09-1103/21 Streetsweeper invoices, 23/02/21, 25/02/21, 26/02/21	Spoil removal works supervised by JBS&G include photos of trucks fitted with roll-on roll-off covers in use. Site access and egress is stabilized. No material tracking issues observed. A streetsweeper is engaged to clean streets where required.	Compliant	All	Construction	Note	Applies to all stages of construction.
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 04/06/21 TBT December 20 – June 2021 BINGO monthly waste report, April 20 - May 2021	Negligible concrete waste was generated during the audit period. TBT include discussion on environmental issues including dewatering, concrete management, traffic and access. Concrete was cured within plastic bunded location, placed in skip and disposed of a GSW.	Compliant	All	Construction	Note	Applies to all stages of construction.
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.	Site Audit Report and Site Audit Statement, Stages 1 and 2, Ramboll, 16/04/21 PJA Productions notice to SafeWork of removal of non-friable asbestos 28/05/21 – 26/06/21. PJA Asbestos removal licence current 24/10/23	Waste classification and disposal for Stage 1 and 2 was assessed by the Contaminated Sites Auditor in Section 8.4 and 12.4 of the Site Audit Report. The Auditor determined classification and disposal to be adequate. SafeWork had been notified of ACM removal works for Stage 3. According to the records 2 x loads of ACM were disposed of to the BINGO waste disposal facility at Eastern Creek.	Compliant	All	Construction	Note	Applies to all stages of construction.

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		Tip dockets x 2, BINGO Eastern Creek, 07/06/21						
Incident Notification, Reporting and Response								
C36	<p>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.</p> <p>Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 1.</p> <p>Note: Appendix 1 as provided in SSD 8640 Development Consent</p>	<p>Interview with Auditees 04/06/21</p> <p>Incident Register 24/10/19 – current</p>	No notifiable incidents or non-compliances have been identified by the Project.	Not triggered	All	Construction	Note	Applies to all stages of construction.
Non-Compliance Notification								
C37	<p>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 Certifier must also notify the Department in writing to compliance@planning.nsw.gov.au within seven days after they identify any non-compliance.</p> <p>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.</p> <p>A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p>	<p>Interview with Auditees 02/06/20</p> <p>Letter SINSW to DPIE 09/04/21</p> <p>Letter SINSW to DPIE 26/03/21 (lodged 27/03/21)</p> <p>Letter SINSW to DPIE 08/04/21</p>	<p>No incidents or non-compliances have been identified by the Project other than those identified through the independent audits.</p> <p>CoC D3: Issuing of external walls and cladding certification to the Department did not occur within 7 days of the Certifier accepting it. The relevant information was issued to the Department on 09/04/21 to address the non-compliance. The non-compliance was notified on 09/04/21</p> <p>D36(d): Tree hollows and tree trunks were not able to be retained on the Project in line with the condition. This was notified on 27/03/21. An application to modify condition D36 (mod 3) was lodged on 08/04/21. The application is under assessment by the Department.</p>	Compliant	All	Construction	Note	Applies to all stages of construction.
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	Stage 2	Construction	Audit Program to be confirmed prior to commencing construction	Applies to all stages of construction.
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 Certifier.	<p>Independent Audit Program, WolfPeak 27/05/19</p> <p>Submission of Program to DPIE, 25/06/19</p>	Non-compliance from the second audit: the Audit Program was not submitted until 25/06/19, approximately 6 weeks after commencement of construction. This is now closed.	Compliant	Stage 2	Construction	Audit Program to be confirmed prior to commencing construction	Applies to all stages of construction.
C40	<p>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:</p> <p>(a) an initial construction Independent Audit must be undertaken within 8 weeks of the notified commencement date of construction; and</p>	Picton High School – SSD 8640 Independent Audit Report 03/07/20	The third independent audit report, and the response to the findings was submitted to the Department on 06/07/20. This included notice of the non-compliances and intent to publish the Report and the response.	Compliant	All	Construction	Audit Program to be confirmed prior to	Applies to all stages of construction.

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
	(b) a subsequent Independent Audit of construction must be undertaken no later than 6 months from the date of the initial construction Independent Audit.	Letters SINSW to DPIE 06/07/20					commencing construction	
C41	Independent Audits of the development must be carried out in accordance with: (a) the Independent Audit Program submitted to the Department and the Certifier 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 Third Independent Audit Report WolfPeak, 01/07/20 Email Taylor to Certifier 03/07/20 (submission of third Independent Audit Report). Email SINSW to DPIE 07/07/20 (submission of third Independent Audit Report and response).	This and the third Independent Audit have been conducted in accordance with the Independent Audit Program and the Departments IAPAR.	Compliant	All	Throughout	Audit Program to be confirmed prior to commencing construction	Applies to all stages of construction.
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 Certifier; 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 Certifier in writing at least seven days before this is done.	Third Independent Audit Report WolfPeak, 01/07/20 Email Taylor to Certifier 03/07/20 (submission of third Independent Audit Report). Letter SINSW to DPIE 06/07/20 (submission of third Independent Audit Report and response, and notification of publication). Email SINSW to DPIE 07/07/20 (submission of third Independent Audit Report and response). Email Mace to Certifier 21/06/20 (notification of publication of third Independent Audit Report).	The third independent audit report, and the response to the findings was submitted to the Department on 06/07/20. This included notice of the non-compliances and intent to publish the Report and the response. The report (which contains the projects response to the findings within the report) is presented online. Non-compliance: The Certifier was not notified of the publication of the third Independent Audit Report until after the site inspection for the fourth Independent Audit.	Non-compliant	All	Throughout	Audit Program to be confirmed prior to commencing construction	Applies to all stages of construction.
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.	All	Operation	Audit Program to be confirmed prior to commencing construction	Applies to all stages of construction.
Revision of Strategies, Plans and Programs								
C44	Within three months of: (a) the submission of a compliance report under condition B37; (b) the submission of an incident report under condition C36; (c) the submission of an Independent Audit under condition C40; (d) the issue of a direction of the Planning Secretary under condition A2 which requires a review,	CCR3, October 2020 DPIE post approval portal 06/11/20 (CCR3 submission) CCR4, March 2021 DPIE post approval portal 15/04/21 (CCR4 submission)	Non-compliance: A review was not conducted or notified within 3 months of submission of CCR3. The Department was notified of the review of the strategies plans and programs. This was within 3 months of the third Independent Audit.	Non-compliant	All	Throughout	Note	Applies to all stages of construction.

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
	the strategies, plans and programs required under this consent must be reviewed, and the Department and the Certifier must be notified in writing that a review is being carried out.	Pre-Ops CR1, 16/04/21 Pre-Ops CR2, 16/04/21 DPIE post approval portal 19/04/21 (Pre-Ops CR1 and CR2 submission) Letters SINSW to DPIE 06/07/20 (submission of Audit Report) Letter SINSW to DPIE 13/08/20						
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 Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary 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>	Letter SINSW to DPIE 13/08/20	The Department was notified of the review of the strategies plans and programs. Some aspects of the Taylor Project EMP was updated and provided to the Department. The Department had not provided a response.	Compliant	All	Throughout	Note	Applies to all stages of construction.
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.	Site inspection 04/06/21 AMAC work method statement 10/3/19	Non-compliance: The Archaeological Work Method Statement was prepared in 2019, however there was no evidence to demonstrate that it was implemented for works undertaken on the alignment of Hume Highway.	Non-compliant	All	Construction	Note	Applies to all stages of construction.
PART D PRIOR TO OCCUPATION OR COMMENCEMENT OF USE								
Notification of Occupation								
D1	The date of commencement of the occupation of the development must be notified to the Department in writing, at least one month before occupation. If the operation of the development is to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Letter SINSW to DPIE 23/02/21 (notice of stage 2) Letter SINSW to DPIE 09/02/21 (notice of stage 1) and DPIE post approval lodgement record	Notification of Stage 1 operations was made on 09/04/21. Notification of Stage 2 operations was made on 23/02/21. Both stages commenced operations on 19/04/21.	Compliant	1, 2 and 3	Pre-Occupation	Note	Letter to be issues to DPIE minimum one month prior to occupation of each stage
External Walls and Cladding								
D2	Prior to the occupation of the building, the Applicant must provide the Certifier 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.	Emails x2 Taylor to Certifier, 19/03/21 (Stage 1 and Stage 2 submission) Emails x 2 Certifier to Taylor, 23/03/21 (Stage 1 and Stage 2 acceptance). Crown Completion Certificate, P217_007, 16/04/21	The evidence was submitted to the Certifier who provided acceptance by email. This was further verified as complete through issue of the Crown Completion Certificate.	Compliant	1, 2 and 3	Pre-Occupation	Note	Contractor to provide compliance documentation prior to the operation of each stage
D3	The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it	Letter SINSW to DPIE 09/04/21	Non-compliance: Issuing of external walls and cladding certification to the Department did not occur within 7 days of the Certifier accepting it. The relevant information was issued to the Department on 09/04/21 to address the non-	Non-compliant	1, 2 and 3	Pre-Occupation	Note	Letter to be issued to DPIE within 7 days of PCA acceptance prior

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			compliance. The non-compliance was notified on 09/04/21 in accordance with CoC C37.					to the operation of each stage.
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"> (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and (b) 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>	Interview with auditees 07/06/21	No damage has been identified to date.	Not triggered	All	Pre-Occupation	Note	Contractor to confirm with relevant authority that repairs/ relocations to public infrastructure have been completed and paid. To be finalized for all stages prior to the occupation of the last stage to be completed (Stage 3) as heavy vehicles associated with the construction of Stage 3 will be utilizing public roads until the operation of Stage 3.
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 Certifier. In ascertaining whether adverse structural damage has occurred to adjoining buildings or infrastructure, the Certifier 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. 	<p>Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20</p> <p>Letter DPIE to SINSW, 16/12/20 (Staging Report approval)</p>	The Staging Report has this condition staged to the end of Stage 3.	Not triggered	Stage 3	Pre-Occupation	Note	To be finalized for all stages prior to the occupation of the last stage to be completed (Stage 3) as heavy vehicles associated with the construction of Stage 3 will be utilizing public roads until the operation of Stage 3
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.	<p>Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20</p> <p>Letter DPIE to SINSW, 16/12/20 (Staging Report approval)</p>	The Staging Report has this condition staged to prior to the occupation of Stage 3.	Not triggered	Stage 3	Pre-Occupation	Note	Contractor to provide documentation for dedication to Wollondilly Shire Council. Prior to the occupation of Stage 3. Stage 1 works are only a minor portion of

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
								the development and are completely internal to the school boundary, there are no interface works with external roads for stage 1. The Wonga Road extension works are programmed for Stage 2.
Roadworks and Access								
D7	Prior to the commencement of operation of the development, the Applicant must complete the construction of the Wonga Road extension including roundabout to the satisfaction of Council.	Certificate of Completion, Council, 201.2019.00000024.001 (Wonga Rd)	The completion certificate was issued by Council on 17/07/20, evidencing completion of these works prior to Stage 2 (which commenced on 19/04/21).	Compliant	Stage 2	Pre-Occupation	Note	Contractor to provide compliance documentation. Prior to the occupation of Stage 2. Stage 1 works are only a minor portion of the development and are completely internal to the school boundary, there are no interface works with external roads for Stage 1. The Wonga Road extension works are programmed for Stage 2.
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.	DPIE letter of approval of plans for Argyle Street and Wonga Road, 23/08/19 Sign post plan, May 2019 Wonga Road Sign Post, Oct 2018. Certification of Practical Completion, Council, 201.2020.00000068.001 (Argyle Street) Certificate of Completion, Council, 201.2019.00000024.001 (Wonga Rd)	Council issued completion certificates for the practical completion of works on Wonga Road and Argyle Street (which include signage and line marking). Non-compliance: Whilst Council issued a certificate of practical completion, the Auditor understands that negotiations with Council over the last 2 years may have resulted in changes to the original design of the works on Wonga Road and Argyle Street. The Auditor requested that the auditees provide evidence to demonstrate that the signage and line-marking align with that set out in the plans prepared under CoC B32. No evidence was provided.	Non-compliant	Stage 2 and 3	Pre-Occupation	Note	Stage 1 incorporates no road access works. Relevant works on Argyle Street are completed as part of Stage 2 (line marking, northern pedestrian crossing and footpaths) and 3 (proposed southern pedestrian crossing) works. D8 works are not associated with other stages and are not required to

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
								allow stages 1 and 2 to operate.
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 Certifier.	<p>Work as Executed Plans, Stormwater 08/04/21</p> <p>Work as Executed Plans, Finished levels 09/04/21</p> <p>Work as Executed Plans, OSD and stormwater finished levels (drawing 181880-2 and -3 OSD WAE)</p> <p>Email Taylor to Certifier, 15/04/21 (submission)</p> <p>Crown Completion Certificate, P217_007, 16/04/21</p>	Work as executed plans were prepared for stormwater and finished levels and were submitted to the Certifier. Acceptance evidenced through issue of the Crown Completion Certificate.	Compliant	1,2 and 3	Pre-Occupation	Note	Contractor to provide compliance documentation. Prior to the occupation of all Stages.
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> .	Section 73 Compliance Certificate, 04/12/29	The Section 73 Compliance Certificate was approved by Sydney Water 04/12/29 well before operations.	Compliant	Stage 2	Pre-Occupation	Note	Not relevant to Stage 1 or 3. There are no water and sewerage infrastructure works within these stages
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.	<p>Road Safety Evaluation Report, TTP, 05/06/19.</p> <p>Letter Taylor to Mace, 16/04/21</p>	<p>Observation: The Road Safety Evaluation made 22 x findings, some of which relate to assets surrounding / adjacent to / interfacing with areas used for bus and private vehicle drop off. None strictly related to bus and private vehicle drop-off and pick-up facilities themselves. According to a statement provided by Taylor</p> <ul style="list-style-type: none"> - All findings regarding the Wonga Road works have been implemented and works achieved completion as per attached completion certification issued by Wollondilly Shire Council - Findings regarding Argyle Street have only been partially implemented due to Council requirements having deviated from the original design. Findings regarding Argyle Street are currently being negotiated and consulted with Council, Transport for NSW and affected neighbouring properties to reach a revised and final design - Several findings will be reviewed as a new Road Safety Evaluation is proposed to be completed to reflect final approved design. 	Observation	Stage 2 and 3	Pre-Occupation	Note	Not relevant to Stage 1 or 3. There are no water and sewerage infrastructure works within these Stages.

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
			The Auditor notes that bus and private vehicle drop-off and pick-up are currently in operations.					
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. 	<p>DPIE post approval portal lodgement 15/04/21</p> <p>Green Travel Plan, Stantec, 14/04/21</p> <p>Email TfNSW to Mace, 29/03/21</p> <p>Email Mace to Council, 30/03/21 (meeting notes)</p> <p>CV Chris Carlaw (Stantec)</p>	<p>The GTP was prepared by a traffic engineer</p> <p>The GTP prepared in consultation with Council and TfNSW. Their comments were incorporated.</p> <p>Objectives and mode share targets included section 2, 3 and 4.</p> <p>Specific tools and actions are identified in section 5 and 6.</p> <p>Methodology and monitoring review program is in section 6.</p>	Compliant	Stage 2	Pre-Occupation	Note	<p>Contractor to provide compliance documentation. Documentation to be provided prior to the occupation of the new school at the completion of Stage 2. Stage 1 is only minor works and temporary school and associated infrastructure will still be utilized. The school capacity will not be increased in Stage 1 and the associated traffic impacts of the school would therefore be consistent with the existing situation.</p>
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 ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish; b) the location of all car parking spaces on the school campuses and their allocation (i.e. staff, visitor, accessible, emergency, etc.); c) the location and operational management procedures of the pick-up and drop-off parking, including staff management/traffic controller arrangements; d) the location and operational management procedures for the pick-up and drop-off of students by buses and coaches for excursions and sporting activities during the hours of bus lane operations, including staff management/traffic controller arrangements; e) delivery and services vehicle and bus access and management arrangements; f) management of approved access arrangements; g) potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing pick-up and drop-off parking; h) car parking arrangements and management associated with the proposed use of school facilities by community members; and i) a monitoring and review program. <p>The OTAMP(s) must be submitted to the Secretary for approval prior to operation of the development.</p>	<p>Operational Transport Access Management Plan, Stantec, 24/03/21</p> <p>Letter DPIE to SINSW 08/04/21</p>	<p>The OTAMP was prepared and submitted to the Department prior to operations. It was prepared in consultation with the identified stakeholders and addresses the requirements a) – i) of this condition.</p> <p>On 08/04/21 the Department approved the OTAMP on the basis that it satisfied this condition.</p>	Compliant	Stage 2	Pre-Occupation	Note	<p>Contractor to provide compliance documentation. Documentation to be provided prior to the occupation of the new school at the completion of Stage 2. Stage 1 is only minor works and temporary school and associated infrastructure will still be utilized. The school capacity will not be increased in Stage 1 and the associated traffic impacts of the school would therefore be</p>

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
	The OTAMP(s) (as revised from time to time) must be implemented by the Applicant for the life of the development							consistent with the existing situation.
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.	Bush Fire Emergency Management and Evacuation Plan, Peterson Bushfire, 26/02/21	The Bush Fire Emergency Management and Evacuation Plan was prepared by the bushfire consultant. It states that it was prepared in accordance with the relevant guideline.	Compliant	Stage 2	Pre-Occupation	Note	Contractor to provide compliance documentation. Documentation to be provided prior to the occupation of the new school at the completion of Stage 2. Stage 1 is only minor works and temporary school and associated infrastructure will still be utilized. The school capacity will not be increased in Stage 1 and the associated traffic impacts of the school would therefore be consistent with the existing situation. The temporary school will still be operational during stage 1.
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>	Plangrid Photo Report, 12/03/21 (school zone markings report) Interview with auditees 07/06/21	Evidence shows that the school zone markings were installed on Wonga Road on 17/07/20, well before operations. The existing school zone markings on Argyle Street were not altered by the works.	Compliant	Stage 2 and 3	Pre-Occupation	Note	Stage 1 incorporates no road and access works. All School Zone signage is currently installed. Contractor to provide compliance documentation. Relevant works on Argyle Street are completed as a part of stage 2 (line marking, northern pedestrian crossing and footpaths) and 3

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
								(proposed southern pedestrian crossing) works.
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.	Certificate of Completion, Council, 201.2019.00000024.001 (Wonga Rd) Interview with auditees 07/06/21	Council issued completion certificates for the practical completion of works on Wonga Road (which include signage and line marking). The existing school zone markings on Argyle Street were not altered by the works. Non-compliance: Wonga Road is classified as a local road and Council is the Road Authority, however the Auditor is of the understanding that Transport for NSW is responsible for School Zone signage. There was no evidence provided to demonstrate that Transport had not inspected the signs, nor had those assets handed over.	Non-compliant	Stage 2 and 3	Pre-Occupation	Note	Stage 1 incorporates no road and access works. All School Zone signage is currently installed. Contractor to provide compliance documentation. Relevant works on Argyle Street are completed as a part of stage 2 (line marking, northern pedestrian crossing and footpaths) and 3 (proposed southern pedestrian crossing) works. Contractor to arrange an inspection with relevant authority for formal handover of assets in Stage 2 and 3.
D17	The Applicant must maintain records of all dates in relation to installing, altering and removing traffic control devices related to speed.	Plangrid Photo Report, 12/03/21 (school zone markings report) Interview with auditees 07/06/21	For Wonga Road, the dates of installation of traffic control devices were recorded. The auditees advise that no traffic control devices were altered or removed as part of the works. No additions, alterations or removal of traffic control devices occurred on Argyle Street.	Compliant	Stage 2 and 3	Pre-Occupation	Note	Contractor to provide compliance documentation if required. Stage 1 and the associated traffic impacts of the school would therefore be consistent with the existing situation. The temporary school will still be operational during stage 1.
Mechanical Ventilation								

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D18	<p>Following completion, installation and testing of all mechanical ventilation systems, the Applicant must provide evidence to the satisfaction of the Certifier, prior to the final occupation, that the installation and performance of the mechanical systems complies with:</p> <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. 	<p>Installation Certificate, New Edge Group, 22/03/21 (stage 1)</p> <p>Email Certifier to Taylor 07/04/21 (acceptance of stage 1)</p> <p>Installation Certificate, New Edge Group, 22/03/21 (stage 2)</p> <p>Email Certifier to Taylor 13/04/21 (acceptance of stage 2)</p> <p>Crown Completion Certificate, P217_007, 16/04/21</p>	<p>Installation certificates were issued by the installing contractor and accepted by the Certifier prior to operations.</p>	Compliant	Stage 2 and 3	Pre-Occupation	Note	Contractor to provide compliance documentation at completion of Stages 2 and 3. No mechanical ventilation systems included in Stage 1 works.
Road Damage								
D19	<p>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.</p>	<p>Interview with auditees 07/06/21</p> <p>Certification of Practical Completion, Council, 201.2020.00000068.001 (Argyle Street)</p> <p>Certificate of Completion, Council, 201.2019.00000024.001 (Wonga Rd)</p>	<p>No damage has been identified by the Project.</p>	Not triggered	Stages 1,2 and 3	Pre-Occupation	Note	This condition applies to any damage to Council and other public authority assets at all stages.
Fire Safety Certification								
D20	<p>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.</p>	<p>Fire Safety Certificate 14/04/21 (Stages 1 and 2)</p> <p>Photo of Fire Safety Certificate installed next to FIP dated 19/04/21</p> <p>Email Mace to Council, 14/04/21</p> <p>Email Mace to FRNSW, 16/04/21</p> <p>Email Taylor to Certifier, 14/04/21</p>	<p>The Fire Safety Certificate was obtained and posted prominently. The Certificate was issued to the identified stakeholders.</p>	Compliant	Stages 1,2 and 3	Pre-Occupation	Note	Contractor to provide compliance documentation for all buildings to be occupied.
Structural Inspection Certificate								
D21	<p>A Structural Inspection Certificate or a Compliance Certificate must be submitted to the satisfaction of the Certifier 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 Certifier is satisfied that the structural works is deemed to comply with the final design drawings; and 	<p>Structural Inspection Certificate Meinhardt Bonacci, 12/03/21 (stage 1)</p> <p>Structural Inspection Certificate Meinhardt Bonacci, 12/03/21 (stage 2)</p>	<p>Structural Inspections were completed by the structural engineer prior to operations.</p> <p>The inspection statements and final drawings were submitted to Council and the Certifier.</p> <p>This was verified as adequate by the Certifier through issue of the Crown Completion Certificate.</p>	Compliant	Stages 1,2 and 3	Pre-Occupation	Note	Contractor to provide compliance documentation for all buildings to be occupied.

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	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	Final Inspection close out statement Certificate Meinhardt Bonacci, 13/04/21 (stage 2), Email Mace to Council, 10/04/21 (stage 1 submission) Email Mace to Council, 14/04/21 (stage 2 submission) Crown Completion Certificate, P217_007, 16/04/21						
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 Certifier prior to occupation.	Installation Certificate, Alpha Catering Equipment, 20/03/21 Email Taylor to and from Certifier, 13/04/21 Crown Completion Certificate, P217_007, 16/04/21	The kitchen installer confirmed compliance with AS4674 and this condition. The Certifier confirmed acceptance through both email and issue of the Crown Completion Certificate.	Compliant	Stages 1 and 2	Pre-Occupation	Note	Contractor to provide compliance documentation. No kitchen facilities included within Stage 3 works.
Stormwater Quality Management Plan								
D23	Prior to occupation of the building, an Operation and Maintenance Plan (OMP) is to be prepared to ensure proposed stormwater quality measures remain effective. The OMP must contain the following: <ul style="list-style-type: none"> a) maintenance schedule of all stormwater quality treatment devices; b) record and reporting details; c) relevant contact information; and d) Work Health and Safety requirements 	Letter Taylor to Mace, 24/03/21 Operation and maintenance manual, Spel Stormwater (no date / rev).	The OMP was prepared. It includes maintenance schedules, and the work health and safety requirements are included. Non-compliance: The record and reporting details, relevant contact details, are not identified in the OMP.	Non-compliant	Stage 2	Pre-Occupation	Note	Contractor to provide compliance documentation. All stormwater management works completed within Stage 2.
Rainwater Harvesting								
D25	A signed works-as-executed Rainwater Re-use Plan must be provided to the Certifier prior to occupation of the building.	Work as Executed Plans, OSD and stormwater finished levels (drawing 181880-2 and -3 OSD WAE) Email Taylor to Certifier, 15/04/21 (submission) Crown Completion Certificate, P217_007, 16/04/21	Work as executed plans were prepared for rainwater / OSD and were submitted to the Certifier. Acceptance evidenced through issue of the Crown Completion Certificate.	Compliant	Stage 2	Pre-Occupation	Note	Contractor to provide compliance documentation. All rainwater harvesting works to be completed within Stage 2.
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> , <i>Public Health Regulation 2012</i> 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.	Letter New Edge Group to Taylor, 15/03/21 Crown Completion Certificate, P217_007, 16/04/21	The HVAC contractor provided a written statement that no warm water systems and water cooling systems are installed. This was accepted by the Certifier through issue of the Crown Completion Certificate	Not triggered	Stages 1, 2 and 3	Pre-Occupation	Note	Contractor to provide compliance documentation.

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Outdoor Lighting								
D27	<p>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:</p> <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. <p>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.</p>	<p>Installation Certificate, Pro Electrical, 24/03/21</p> <p>Email Certifier to Taylor, 07/04/21</p> <p>Crown Completion Certificate, P217_007, 16/04/21</p>	<p>The installation certificate states that the lighting complies with this requirement.</p> <p>This was accepted by the Certifier via email and through issue of the Crown Completion Certificate</p>	Compliant	Stages 1,2 and 3	Pre-Occupation	Note	Contractor to provide compliance documentation for all external lighting works included within Stage 1, 2, and 3.
Signage								
D28	Way-finding signage and signage identifying the location of staff car parking must be installed prior to occupation.	Site photos 19/04/21, IMG 4537, IMG 4536.	Evidence shows that the signage for the staff car park was installed prior to operations.	Compliant	Stages 2 and 3	Pre-Occupation	Note	Existing signage is retained for Stage 1. Contractor to provide compliance documentation. Stage 1 is a minor portion of development and the temporary school will be operational. Final signage to be implemented in Stage 2 and 3 as all footpaths, parking and road works are completed.
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.	Site photos 19/04/21, IMG 4537, IMG 4536.	Evidence shows that the signage for no access was installed prior to operations.	Compliant	Stage 3	Pre-Occupation	Note	Stage 1 is a minor portion of development and the temporary school will be operational. Final signage to be implemented in Stage 3 as this is when southern car park works will be completed.
D30	Bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas prior to occupation.	Site photos 19/04/21, IMG 4537, IMG 4536.	Evidence shows that the signage for the cyclists was installed prior to operations.	Compliant	Stage 2	Pre-Occupation	Note	Stage 1 is a minor portion of development and the temporary school will be operational. Final signage to be completed in Stage 2 as this is

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								when bicycle parking will be occupied.
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.	Site photos 25/03/21	Evidence shows that the signage for do not drink was installed prior to operations.	Compliant	Stages 2 and 3	Pre-Occupation	Note	Contractor to provide compliance documentation. No works related to non potable water will be undertaken in stage 1.
Operational Waste Management Plan								
D32	<p>Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Department/Certifier. The Waste Management Plan must:</p> <ul style="list-style-type: none"> a) detail the type and quantity of waste to be generated during operation of the development; b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); c) detail the materials to be reused or recycled, either on or off site; and d) include the Management and Mitigation Measures included in EIS. 	<p>Operational Waste Management Plan, SMEC, 13/04/21</p> <p>DPIE post approval portal lodgement 15/04/21</p> <p>Email Taylor to Certifier, 13/04/21</p>	<p>The OWMP was prepared. It addresses the type and quantities of waste, handling, storage and disposal, the materials for reuse and recycling, mitigation measures are included in section 4 and 5 of the OWMP (noting that the ESI does not include operational waste management and mitigation measures).</p> <p>The OWMP was submitted to the identified stakeholders.</p> <p>Observation: The Operational Waste Management Plan identifies collection (i.e. commercial waste transporter collection), not disposal at destination. The hours for collection do not align with the hours specified in CoC E9.</p>	Compliant	Stage 2	Pre-Occupation		<p>Waste management plan to be in place prior to occupation at the completion of Stage 2 which addresses the operation of the entire development. Minor portion of development will be completed in Stage 1 and temporary school is still in operation at this stage and will continue to utilise the existing operational waste management plan. Therefore, D32 not required for Stage 1.</p>
Validation Report								
D33	<p>The Applicant must prepare submit 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 consultants certified under either the Environmental Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) Scheme (CEnvP(SC)) or the Soil Science; b) be submitted to EPA, the Planning Secretary and the Certifier 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 (OEH, 2014) Consultants Reporting on Contaminated Land: Contaminated Land Guidelines (EPA, 2020) 	<p>Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20</p> <p>Letter DPIE to SINSW, 16/12/20 (Staging Report approval)</p>	The Staging Report has this condition staged to prior to the occupation of Stage 3.	Not triggered	Stage 3	Pre-Occupation	Note	To be finalised prior to the occupation of the last stage (Stage 3) as there will still be earthworks completed (a) be prepared by an EPA accredited Site Auditor; at Stage 3.

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	<p>and relevant guidelines made or approved under section 105 of the Contaminated Land Management Act 1997:</p> <p>d) include, but not be limited to:</p> <ul style="list-style-type: none"> (i) comment on the extent and nature of the remediation undertaken, if applicable; (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, if applicable; (v) details of the volume of treated material emplaced within the containment cell and its location, if applicable; (vi) results of any validation sampling, compared to relevant guidelines/criteria; (vii) discussion of the suitability the remediated areas of the land for the intended land use; and (viii) any other requirement relevant to the project. 							
Site Audit Report and Site Audit Statement								
D34	<p>Prior to occupation of the building, the Applicant must obtain from an EPA accredited Site Auditor a, Site Audit Statement and a Site Audit Report which demonstrates that the site is suitable for its intended use(s) Section A1 or Section A2 Site Audit Statement accompanied by an Environmental Management Plan, if required, that is prepared in accordance with The Guidelines for Consultants reporting on contaminated Land: Contaminated land guideline (NSW EPA 2020) and its accompanying Site Audit Report, which states that the land has been made suitable for the intended land use.</p>	<p>Site Audit Report, Ramboll 16/04/21</p> <p>Site Audit Statement (Appendix B), Ramboll 16/04/21</p>	<p>The Stage 1 and Stage 2 SAR and SAS was prepared prior to occupation. It was prepared in accordance with the relevant guideline and confirms the Project to be suitable for its use.</p>	Compliant	Stages 1,2 and 3	Pre-Occupation	Note	Contractor to provide compliance documentation prior to the operation of all stages.
D35	<p>Within three months of submission of the Validation Report required by condition D26, the Applicant must demonstrate to the satisfaction of the Certifier 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) (EPA, 2017).</p>	<p>Site Audit Report, Ramboll 16/04/21</p> <p>Site Audit Statement (Appendix B), Ramboll 16/04/21</p> <p>Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20</p> <p>Letter DPIE to SINSW, 16/12/20 (Staging Report approval)</p>	<p>The Stage 1 and Stage 2 SAR and SAS was prepared prior to occupation. It was prepared in accordance with the relevant guideline and confirms the Project to be suitable for its use.</p> <p>The Staging Report has this condition staged to prior to the occupation of Stage 3.</p>	Not triggered	Stage 3	Pre-Occupation	Note	To be finalised prior to the occupation of the last stage (Stage 3) as all earthworks will be complete at Stage 3.
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) (Issue C) prepared by Arcadia Landscape Architecture dated March 2019 November 202 and at least 14 additional canopy trees; b) detail the species to be planted on-site; c) include details of the area surrounding the education trail is to be s to be rehabilitated with local native plants; d) include details that the native trees to be removed from the site are to be salvaged, including tree hollows and tree trunks (greater than 25cm in diameter and 3m in length) and used to enhance habitat at the site; 	<p>Landscape Management Plan, Arcadis, April 2021</p> <p>DPIE post approval lodgement record 27/03/21 (initial submission)</p> <p>Letter DPIE to SINSW, 10/05/21 (approval letter)</p> <p>Letter SINSW to DPIE 08/04/21 (non-compliance notice)</p>	<p>The Landscape Management Plan was prepared and submitted to the Department prior to operations. The Department provided comments back on 09/04/21 stating that updates were required to address requirements a), b), g), i) of this condition.</p> <p>The Landscape Management Plan was updated to address all requirements of this condition other than item (d). The Landscape Management Plan was approved by the Department on 10/05/21.</p> <p>Non-compliance: Tree hollows and tree trunks were not able to be retained on the Project in line with the condition. This was notified on 27/03/21. An application to modify condition</p>	Non-compliant	Stage 2	Pre-Occupation	Note	Contractor to provide compliance documentation. Management plan in place prior to occupation of the new School at completion of Stage 2 which will address the entire development.

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	<ul style="list-style-type: none"> 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>. 		<p>D36 (mod 3) was lodged on 08/04/21. The application is under assessment by the Department.</p> <p>Non-compliance: The Landscape Management Plan was not approved prior to occupation of Stage 2.</p>					
D37	The Applicant must not commence operation until the Landscape Management Plan is submitted to the Certifier.	Email Certifier to Taylor, 06/04/21	The Landscape Management Plan was accepted prior to operations.	Compliant	Stage 2	Pre-Occupation	Note	Contractor to provide compliance documentation. Management plan in place prior to occupation of the new School at completion of Stage 2 which will address the entire development.
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.	<p>Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20</p> <p>Letter DPIE to SINSW, 16/12/20 (Staging Report approval)</p>	The Staging Report has this condition staged to prior to the occupation of Stage 3.	Not triggered	Stage 3	Pre-Occupation	Note	Contractor to provide compliance documentation. Cannot be completed until completion of Stage 3 due to the Temporary School removal, the current Temporary School location is within the asset protection zone of the new buildings, due to this the project will continue to function under the Temporary School asset protection zone until the completion of Stage 3.
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; 	<p>Certificate of Completion, Council, 201.2019.00000024.001 (Wonga Rd)</p> <p>Interview with auditees 07/06/21</p>	<p>Council issued completion certificates for the practical completion of works on Wonga Road (which include signage and line marking).</p> <p>The existing school zone markings on Argyle Street were not altered by the works.</p> <p>Non-compliance: Wonga Road is classified as a local road and Council is the Road Authority, however the Auditor is of the understanding that Transport for NSW is responsible for School Zone signage. There was no evidence provided to</p>	Non-compliant	Stages 2 and 3	Pre-Occupation	Note	Stage 1 incorporates no road and access works. All School Zone signage is currently installed. Contractor to provide compliance documentation. Relevant works on Argyle Street are completed as part of Stage 2 (line

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	(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.		demonstrate that the information specified by this condition had been provided to Transport.					marking, northern pedestrian crossing and footpaths) and 3 (proposed southern pedestrian crossing) works. Contractor to arrange an inspection with relevant authority for formal handover of assets in Stage 2 and 3.
PART E POST OCCUPATION								
Out of Hours Event Management Plan								
E1	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: 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. 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.	Interview with auditees 07/06/21 OOHEMP, Stantec, 02/06/21 Email, Council to Mace, up to and including 11/05/21 DPIE post approval portal lodgement 03/06/21	An OOHEMP has been developed in consultation with Council. Council provided comment and these were incorporated. The OOHEMP identifies: <ul style="list-style-type: none"> the number of attendees, time and duration; arrival and departure times and modes of transport; where relevant, a schedule of all annual events; demonstrate measures to encourage non-vehicular measures to minimise localised traffic and parking impacts; and measures to minimise noise impacts on any sensitive residential receivers, including an acoustic management plan. A copy was provided to Council and Department. It is understood that no triggering events have occurred.	Compliant	Stage 2	Occupation	Note	To be completed prior to occupation of the new School at completion of Stage 2. Stage 1 is a minor portion of the development. During Stage 1, temporary school and associated infrastructure is still utilised.
E2	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: 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. 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.	Interview with auditees 07/06/21 OOHEMP, Stantec, 02/06/21 Email, Council to Mace, up to and including 11/05/21 DPIE post approval portal lodgement 03/06/21	An OOHEMP has been developed in consultation with Council. Council provided comment and these were incorporated. The OOHEMP identifies: <ul style="list-style-type: none"> the number of attendees, time and duration; arrival and departure times and modes of transport; where relevant, a schedule of all annual events; demonstrate measures to encourage non-vehicular measures to minimise localised traffic and parking impacts; and measures to minimise noise impacts on any sensitive residential receivers, including an acoustic management plan. A copy was provided to Council and Department. It is understood that no triggering events have occurred.	Compliant	Stage 2	Occupation	Note	To be completed prior to occupation of the new School at completion of Stage 2. Stage 1 is a minor portion of the development. During Stage 1, temporary school and associated infrastructure is still utilised.
Operation of Plant and Equipment								

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E3	All plant and equipment used on site, or to monitor the performance of the development must be: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Interview with auditees 07/06/21 Evidence referred to elsewhere in this Audit Table	Refer to other conditions regarding installation certificates. All equipment is only recently installed and remains in the defects period.	Compliant	All	Occupation	Note	Applicable to all stages
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.	https://www.schoolinfrastructure.nsw.gov.au/projects/p/picton-high-school.html#category-reports	The website includes information demonstrating ongoing implementation of the CCS	Compliant	All	Occupation	Note	Applicable to all stages
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 Acoustic Assessment report prepared by GHD dated January 2019.	Interview with auditees 07/06/21 Evidence referred to elsewhere in this Audit Table Complaints register current to May 2021	Refer to other conditions regarding installation certificates. All equipment is only recently installed and remains in the defects period. No operational noise complaints received.	Compliant	All	Occupation	Note	Applicable to all stages
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.	Interview with auditees 07/06/21 Evidence referred to elsewhere in this Audit Table Complaints register current to May 2021	Refer to other conditions regarding installation certificates. All equipment is only recently installed and remains in the defects period. No operational noise complaints received.	Compliant	All	Occupation	Note	Applicable to all stages
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.	Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval)	The Staging Report has this condition staged to during operations of all stages.	Not triggered	3	Occupation	Note	Noise monitoring to commence at completion of final stage (Stage 3) as this will be a true reflection of full capacity and intensity of use i.e. noise monitoring is measured off background noise. Background noise monitored will be adversely affected from Construction noise in Stage 1 and 2 rendering test results invalid. Completion of Stage 1 and Stage 3 is a only 6 month period.
E8	Use of the school hall, performance, fitness and music facilities are not to be used between 10.00 pm and 8:00 am.	Interview with auditees 07/06/21 Complaints register current to May 2021	No OOH events have occurred. No operational noise complaints received.	Compliant	All	Occupation	Note	Applicable to all stages

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E9	The waste collection services are not to be undertaken outside the hours of 7:30 am to 6:00 pm Monday to Friday.	Interview with auditees 07/06/21 Operational Waste Management Plan, SMEC, 13/04/21 Complaints register current to May 2021 Email chain Suez and SINSW, 17/06/21	Hours have been communicated to the waste service provider. No operational noise complaints received.	Compliant	All	Occupation	Note	Applicable to all stages
E10	The sports field and outdoor sports courts are not made available for community use a) During weekday mornings; b) Later than 6:00 pm on weeknights; and c) Other than between the hours of 8:00 am and 6:00 pm on Saturdays; and during Sundays and public holidays.	Interview with auditees 07/06/21	No facilities have been made available to the public as yet.	Not triggered	All	Occupation	Note	Applicable to all stages
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.	Site inspection 04/06/21	No obstructions observed	Compliant	All	Occupation	Note	Applicable to all stages
Green Travel Plan								
E12	The Green Travel Plan required by condition D12 of this consent must be updated annually and implemented.	Site inspection 04/06/21 Crown Completion Certificate P217_007-3, 16/04/21 (completion of Milestone 1 and 2)	Operations commenced 19/04/21	Not triggered	Stage 2	Occupation	Note	Applicable to all stages
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.	Complaints register current to May 2021	No complaints have been received regarding operational lighting. 1 x complaint regarding light spill was received prior to operations. The Project addressed the matter. No further complaints received.	Not triggered	All	Occupation	Note	Applicable to all stages
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.	Site inspection 04/06/21 Crown Completion Certificate P217_007-3, 16/04/21 (completion of Milestone 1 and 2)	Operations commenced 19/04/21	Not triggered	All	Occupation	Note	Applicable to all stages
Landscaping								
E15	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition D36 for the duration of occupation of the development.	Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20	The Staging Report has this condition staged to operations of Stage 3.	Not triggered	Stage 3	Occupation	Note	To commence at completion of final stage (Stage 3) as the landscaping works will not be

Unique ID	Compliance Requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status	Staging as per Revised Staging Report, approved 19/03/21			
					Stage	Phase	Action	Comment
		Letter DPIE to SINSW, 16/12/20 (Staging Report approval)						finalised until the completion of Stage 3.
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.	Site inspection 04/06/21	The eastern side of the site is stage 3 and is still under construction	Not triggered	All	Occupation	Note	Applicable to all stages
Asset Protection Zones								
E17	The asset protection zones required by condition D38 shall be maintained for the duration of occupation of the development.	Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval)	The Staging Report has this condition staged to during operations of Stage 3.	Not triggered	Stage 3	Occupation	Note	To commence at completion of final stage (Stage 3) as the asset protection zone in its permanent state will not be in place until the removal of the Temporary school and the completion of Stage 3. The project will continue to function under the Temporary School asset protection zone.
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	Staging Report, Picton High School, SSD 8640, SINSW, 14/12/20 Letter DPIE to SINSW, 16/12/20 (Staging Report approval)	The Staging Report has this condition staged to during operations of Stage 3.	Not triggered	Stage 3	Occupation	Note	To commence at completion of final stage (Stage 3) as all ESD related works will be complete prior to operation of Stage 3.
Environmental Management Plan								
E19	<u>The Applicant must manage the site in accordance with any Environmental Management Plan approved by the Site Auditor (if any) under condition D34 and any on-going maintenance of remediation notice issued by EPA under the Contaminated Land Management Act 1997.</u>	Environmental Management Plan, Douglas Partners, April 2021	An EMP was prepared and formed part of the Site Audit Report prepared by the Contaminated Sites Auditor. It identifies actions to be undertaken to in the event of excavation within certain impacted areas, and in the event of unexpected finds.	Compliant				

APPENDIX B – PLANNING SECRETARY AGREEMENT OF INDEPENDENT AUDITORS



**Planning &
Environment**

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

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

Dear Mr Kavanagh

**Picton High School Redevelopment (SSD 8640)
Condition C38**

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

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

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

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

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

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

Yours sincerely



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

APPENDIX C – CONSULTATION RECORDS

Derek Low

From: Laura Papoulias <Laura.Papoulias@planning.nsw.gov.au>
Sent: Tuesday, 25 May 2021 4:07 PM
To: Derek Low
Subject: RE: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi Derek,

Thank you for your email regarding the project's upcoming independent audit. The Department requests that in addition to reviewing all required conditions of the Approval, you focus on the following matters:

- Check and confirm whether all plans and documents have been submitted to the relevant agencies including the Department before occupation and operation of the school. The audit report must describe if there is evidence of submission and/or approval, as per the issued consent, is not provided by the auditee;
- Notifications of such things as non-compliances and reviews of project documents;
- Ensuring the Applicant's website has all the required documentation;
- Administrative conditions more generally;
- Condition C31 regarding waste storage.

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

Kind regards,

Laura Papoulias
Compliance Officer

Planning & Assessment | Department of Planning, Industry and Environment
T 02 8289 6879 | **M** 0477 977 069 | **E** Laura.Papoulias@planning.nsw.gov.au
Locked Bag 5022 | PARRAMATTA NSW 2124
Please direct all email correspondence to compliance@planning.nsw.gov.au
www.dpie.nsw.gov.au



**Planning,
Industry &
Environment**

If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au.

The Department has recently upgraded the Major Projects Website to improve the timeliness and transparency of its post approval and compliance functions. As part of this upgrade, proponents are now requested to submit all post approval and compliance documents online, via the Major Projects Website. To do this, please refer to the instructions available [here](#).

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

From: Derek Low <dlow@wolfpeak.com.au>
Sent: Friday, 21 May 2021 11:18 AM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)

Hi there,

I am one of the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

We are currently preparing to undertake the fourth 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/-](https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf)

[/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf](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 4 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.

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

Kind regards

Derek Low | Principal Environmental Consultant

General Manager



E: dlow@wolfpeak.com.au

P: 1800 979 716

M: 0402 403 716

A: Suite 2, Level 10, 82 Elizabeth St, Sydney NSW 2000

www.wolfpeak.com.au



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Derek Low

From: Wollondilly Shire Council <council@wollondilly.nsw.gov.au>
Sent: Friday, 21 May 2021 11:19 AM
To: Derek Low
Subject: Wollondilly Shire Council Acknowledgement - PLEASE DO NOT REPLY TO THIS EMAIL Independent Audit of Picton High School Redevelopment (SSD 8640)

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

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For emergency enquiries: Please call 02 4677 1100 - 24 hours link service. PLEASE DO NOT REPLY TO THIS EMAIL

Phone: 02 4677 1100

PICTON.



From: dlow@wolfpeak.com.au
Sent: 21/05/2021 11:19:01 AM +10:00
To: council@wollondilly.nsw.gov.au
Subject: Independent Audit of Picton High School Redevelopment (SSD 8640)
Hi there,

I am one of the approved independent auditors on the Picton High School Redevelopment (SSD 8640).

We are currently preparing to undertake the fourth 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/-](https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf)

[/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf](https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf)

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The purpose of this email is to consult with the 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 the Council confirm any key issues it would like examined relating to post-approval requirements and compliance, that are not already called up by the IAPAR.

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

Kind regards

Derek Low | Principal Environmental Consultant
General Manager



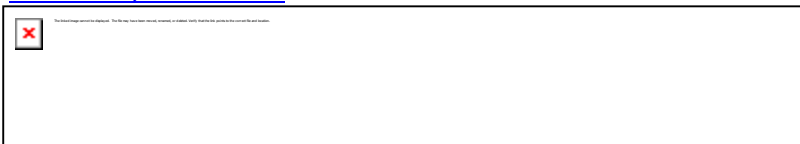
E: dlow@wolfpeak.com.au

P: 1800 979 716

M: 0402 403 716

A: Suite 2, Level 10, 82 Elizabeth St, Sydney NSW 2000

www.wolfpeak.com.au

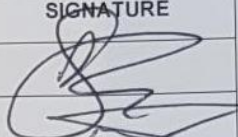
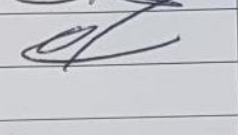

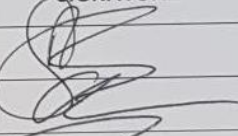
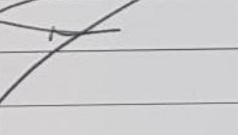
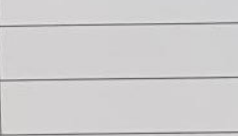


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APPENDIX D – MEETING SIGN ON SHEET

INDEPENDENT AUDIT MEETING ATTENDANCE RECORD

PROJECT (NAME AND APPROVAL NUMBER)		Pictou	
DATE		4/6/21	
LOCATION		Pictou	
OPENING MEETING			
NAME	POSITION / TITLE	ORGANISATION	SIGNATURE
DEBBIE LA	ANALYST	WOLFPEAK	
Moustafa Ibrahim	Project Manager	Taylor	
GORDON BARLOW	ASSISTANT PROJECT MANAGER	MACE	
CLOSING MEETING			
NAME	POSITION / TITLE	ORGANISATION	SIGNATURE
DEBBIE LA	ANALYST	WOLFPEAK	
GORDON BARLOW	ASSISTANT PM	MACE	
Moustafa Ibrahim	Project Manager	Taylor	

APPENDIX E - SITE INSPECTION PHOTOGRAPHS



Photo 1: Landscaping and kiss and drop.



Photo 2: New school main entrance with kiss and drop and signage installed.



Photo 3: Spill kit.



Photo 4: Identification of asbestos conduit.



Photo 5: Stage 3 construction occurring adjacent operations of new school.



Photo 6: Clear, grub and investigations on Stage 3.



Photo 7: Tree protection not in place.



Photo 8: Wonga Road works complete.

APPENDIX F – DECLARATIONS

Independent Audit Declaration Form

Independent Audit Declaration Form

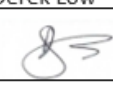
Project name	Picton High School Redevelopment
Consent Number	SSD 8640
Description of Project	Redevelopment of Picton High School including demolition of buildings, excavation, refurbishment of existing buildings, construction of a new two and three storey building connecting to existing buildings, reconfiguration of car and bus drop/off pick up area and access and parking arrangements, boundary adjustments, removal of trees and associated landscaping works.
Project Address	480 Argyle Street, Picton 2571
Proponent	NSW Department of Education (Infrastructure Projects)
Title of Audit	Independent Audit
Date	02/07/2021

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 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

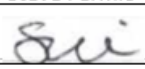
Project name	Picton High School Redevelopment
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Project Address	480 Argyle Street, Picton 2571
Proponent	NSW Department of Education (Infrastructure Projects)
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Date	02/07/21

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- 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 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

Wolfpeak Audit - 4th & 7th June 2021

SSDA 8640 - Picton High School

Based upon Wolfpeak Draft Audit Report dated 05/07/2021

Dated 7/07/2021

Owner Gordon Barlow (Mace)



#	Condition	Type	Description	Action	Response	Owner	Status	Date Closed
1	A22	Non compliance	<p>CoC A22 requires that certain information be made publicly available on the Project website, including a complaints register updated monthly.</p> <p>The website contains the information identified in CoC A22 a)(i)-(x) with the exception of the current complaints register.</p>	Update the Project website to include the current complaints register.	<p>May complaints register is now available on the project website, as of 06/07/2021.</p> <p>A non compliance letter will be forthcoming, and submitted to DPIE.</p>	Mace	Closed	6/07/2021
2	C6	Non compliance	<p>CoC C6 requires that activities may be undertaken outside of the hours in condition C5 if required</p> <p>a) by the Police or a public authority for the delivery of vehicles, plant or materials; or b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or c) where the works are inaudible at the nearest sensitive receivers; or d) where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works. Notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards.</p> <p>Out of Hours Works were completed during April as part of Argyle Street upgrade works. It is understood that drainage, line marking and construction of the island was all approved by Council to occur during the evening and night time periods, however only line marking went ahead during the Out of Hours period (up to approx. 10pm). It is the Auditors opinion that these works would not be inaudible at the nearest receiver and the works do not conform to the requirements of C6 a) – d). That being said, notification was provided to potentially affected residents prior.</p>	Ensure any further Out of Hours Works are only undertaken where compliant with CoC C6.	A non compliance letter will be forthcoming, and submitted to DPIE.	Mace	Closed	6/07/2021
3	C8	Non compliance	<p>CoC C8 requires that 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> <p>The CEMP includes commitments to undertake pre and post-rain site inspections. There was no evidence available to demonstrate that pre and post-rain site inspections had occurred prior to and after the 18/03/21 storm event.</p>	Review the commitments from the CEMP and sub-plans and implement in full for remainder of construction.	<p>This non-compliance is based on a draft report provided by the Independent Environmental Auditor.</p> <p>TCG (the Contractor) have provided evidence to the auditor that inspections were undertaken in accordance with the condition, with particular reference to the storm event on 18/03/2021.</p> <p>This evidence was provided on 5/07/2021 (<i>QSE-F-14.2 WHS Pre and Post Rain Event Inspection Checklist</i>)</p> <p>This matter is therefore no longer a non-compliance.</p>	Taylor	Closed	5/07/2021

4	C18	Observation	<p>CoC C18 requires that vibration caused by construction at any residence or structure outside the site must be limited to:</p> <p>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</p> <p>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).</p> <p>1 x complaint was received in April 2021 regarding cracks on a resident's property. The complainant attributed this to piling works. The auditees advise that piling works were completed in 2018-19 (i.e.: not during the period relating to the complaint) and were at material distance from the property with existing buildings in between the piling and the receiver.</p>	<p>SINSW has attempted to contact resident to inspect and address concern and the complaint remains open. Investigation into the complaint is to be completed.</p>	<p>Investigations ongoing.</p> <p>A desktop assessment of dilapidation report dated 31/03/2021 is being undertaken.</p> <p>Project team have undertaken several site visits of neighbouring property.</p> <p>Project team has requested a building inspection report prepared by a suitably qualified professional, that outlines the summary of recent works undertaken on the property.</p> <p>This information has not been provided by the home owner, and as such this item remains unresolved.</p> <p>SINSW will follow up on the matter with the objective to resolve the issue.</p>	Taylor	Open	
5	C22	Non compliance	<p>CoC C22(c) requires that 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; as amended by the letter prepared by Horticultural Management Services dated 16 October 2019.</p> <p>Trees along the eastern boundary of Stage 3 works are to be retained and are not protected. The Auditor observes that there were minimal works evident within the zones requiring protection.</p>	<p>Erect Tree Protection Zones in accordance with the arboricultural reports.</p>	<p>Review of all aboricultural reports and addendums will be undertaken, to ensure that suitable tree protection measures are afforded to the development site in accordance with this condition.</p> <p>Where recommendations have not been implemented, non compliances will be submitted to DPIE.</p> <p>The applicant notes that the following report specifically excludes the requirement for the trees in question to have a tree protection zone (refer to table in section 10.0 of <i>Hort Management - Arborist Assessment - Picton HS 24.7.2018</i>)</p>	Taylor	Open	
6	C26	Observation	<p>CoC C26 requires that 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> <p>The Erosion and Sediment Control Plan was updated by Taylor for Stage 3 in April 2021, however this was only signed off by the Project civil engineer as being appropriate after the Independent Audit site inspection.</p> <p>3 x complaints were received during the audit period regarding water on the yard of an adjacent property. These were received during the large storm events in February and March 2021. The Erosion and Sediment Control Plan for that time indicates that sediment fence was in place on the boundary and that the operational stormwater network was connected. An investigation was conducted by the Project which indicates that water could have entered the property during the large rain events in February and March 2021, but that the wider area was also affected. The complaints register indicates that Taylor would assist with a clean-up in response to one of the complaints. The Auditor is not aware of the status of this commitment. SINSW consider the issue closed. No further issues have been raised.</p>	<p>Confirm that the clean-up of the 30/03/21 complainant's yard is complete, if not undertake that clean-up.</p>	<p>The project confirms that a clean was undertaken to the neighbouring property on 13/05/2021.</p>	Taylor	Closed	13/05/2021

7	C46	Non compliance	<p>CoC C46 requires that an Archaeological Work Method Statement for the works on the alignment of the Hume Highway (Argyle Street) is to be prepared by a qualified archaeologist and be in place at the site for the duration of excavation works.</p> <p>The Archaeological Work Method Statement was prepared in 2019, however there was no evidence to demonstrate that it was implemented for works undertaken on the alignment of Hume Highway.</p>	Investigate, with the Project archaeologist, whether any impacts to archaeological heritage items had occurred as a result of the Argyle Street works and actions to address / rectify those impacts (if any).	<p>A letter from AMAC Archaeological confirms no impacts to archaeological heritage as a result of the Argyle St works (dated 29/06/2021).</p> <p>This letter has been provided to the Independent Environmental Auditor on 05/07/2021.</p> <p>This matter is therefore no longer a non-compliance.</p>	Taylor	Closed	5/07/2021
8	D8	Non compliance	<p>CoC D8 requires that prior to the commencement of operation of the development, the Applicant must implement detailed signage and line-marking plan in accordance with condition B32.</p> <p>Council issued completion certificates for the practical completion of works on Wonga Road and Argyle Street (which include signage and line marking).</p> <p>Whilst Council issued a certificate of practical completion, the Auditor understands that negotiations with Council over the last 2 years may have resulted in changes to the original design of the works on Wonga Road and Argyle Street. The Auditor requested that the auditees provide evidence to demonstrate that the signage and line-marking align with that set out in the plans prepared under CoC B32. No evidence was provided.</p>	Confirm whether the signage and line-marking comply with the plan within B32.	<p>Review of Signage and Line Marking plans will be undertaken, to ensure that works are consistent with these plans, in accordance with this condition.</p> <p>Where plans have not been implemented, non compliances will be submitted to DPIE.</p>	Taylor	Open	
9	D11	Non compliance	<p>CoC D11 requires that any recommendations of the Road Safety Evaluation 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.</p> <p>The Road Safety Evaluation made 22 x findings. According to a statement provided by Taylor</p> <ul style="list-style-type: none"> -All findings regarding the Wonga Road works have been implemented and works achieved completion as per attached completion certification issued by Wollondilly Shire Council - Findings regarding Argyle Street have only been partially implemented due to Council requirements having deviated from the original design. Findings regarding Argyle Street are currently being negotiated and consulted with Council, Transport for NSW and affected neighbouring properties to reach a revised and final design - Several findings will be reviewed as a new Road Safety Evaluation is proposed to be completed to reflect final approved design. <p>The Auditor notes that bus and private vehicle drop-off and pick-up are currently in operations.</p>	Complete updated Road Safety Evaluation on current as built design.	<p>The RSE was undertaken in accordance with Condition B33, and does not contain explicit recommendations relating to relevant sections of Argyle St and Wonga Rd utilised for bus and private vehicle drop off and pick up.</p> <p>Refer to Section 1.5 of the RSE, in accordance with the NSW Center for Road Safety Guidelines.</p> <p>This matter is therefore no longer a non-compliance, and will be discussed further with the Independent Environmental Auditor.</p>	Mace	Open	
10	D16	Non compliance	<p>CoC D16 requires that 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 (Transport for NSW) for formal handover of assets. The handover of assets must occur prior to commencement of use of the development.</p> <p>Council issued completion certificates for the practical completion of works on Wonga Road (which include signage and line marking). The existing school zone markings on Argyle Street were not altered by the works.</p> <p>Wonga Road is classified as a local road and Council is the Road Authority, however the Auditor is of the understanding that Transport for NSW is responsible for School Zone signage. There was no evidence provided to demonstrate that Transport had not inspected the signs, nor had those assets handed over.</p>	Arrange an inspection of School Zone signage, speed management signage and associated pavement markings with Transport for NSW for formal handover of assets.	<p>The Project has arranged inspection for formal handover of assets with the relevant road authority Wollondilly Shire Council.</p> <p>Please refer to Transport for NSW Response to Submission for the Development proposal.</p> <p>https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-436%2120190224T142015.697%20GMT</p> <p>Therefore, this condition should considered not triggered, and therefore in compliance. This will be discussed further with the Independent Environmental Auditor.</p>	Mace	Open	

			CoC D23 requires that 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: 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.						
11	D23	Non compliance	The record and reporting details, relevant contact details, are not identified in the OMP.	Update the OMP to include the required information	Revised OMP issued to Independent Environmental Auditor. A non compliance letter will be forthcoming, and submitted to DPIE.	Mace	Closed	6/07/2021	
12	D32	Observation	CoC D32 requires that prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Department/Certifier. The Waste Management Plan must: a) detail the type and quantity of waste to be generated during operation of the development; b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); c) detail the materials to be reused or recycled, either on or off site; and d) include the Management and Mitigation Measures included in EIS. The Operational Waste Management Plan identifies collection (i.e.: commercial waste transporter collection), not disposal at destination. The Auditor considers this to be reasonable as the destinations may vary over time depending on the waste service provider. The hours for collection do not align with the hours specified in CoC E9.	Update the Operational Waste Management Plan to capture the hours specified in CoC E9.	An updated OWMP to align collection hours with CoC E9 is to be prepared. This will be discussed further with the Independent Environmental Auditor.	Taylor	Open		
13	C36	Non compliance	CoC D36(d) requires that prior to the 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 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. Tree hollows and tree trunks were not able to be retained on the Project in line with the condition. This was notified on 27/03/21. An application to modify condition D36 (Modification 3) was lodged on 08/04/21. The application is under assessment by the Department. The Landscape Management Plan was not approved prior to occupation of Stage 2.	Comply with the Department's requirements through the assessment and approval (if granted) of Modification 3.	A non compliance letter will be forthcoming, and submitted to DPIE.	Mace	Open		
14	D39	Non compliance	CoC D39 requires that the Applicant must submit certain information to RMS (Transport for NSW), 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. This finding relates to the same issue as that identified against CoC D16. Council issued completion certificates for the practical completion of works on Wonga Road (which include signage and line marking). The existing school zone markings on Argyle Street were not altered by the works. Wonga Road is classified as a local road and Council is the Road Authority, however the Auditor is of the understanding that Transport for NSW is responsible for School Zone signage. There was no evidence provided to demonstrate that the information specified by this condition had been provided to Transport, nor had Transport for NSW authorisation been granted.	Provide the relevant information to Transport for NSW and obtain their authorisation.	As per Condition D16 outlined above, the Project has obtained authorisation to install school zone signs and associated pavement markings from the relevant road authority Wollondilly Shire Council. Please refer to Transport for NSW Response to Submission for the Development proposal. https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-436%2120190224T142015.697%20GMT Therefore, this condition should be considered not triggered, and therefore in compliance. This will be discussed further with the Independent Environmental Auditor.		Open		