INDEPENDENT ENVIRONMENTAL AUDIT
ULTIMO PYRMONT PUBLIC SCHOOL
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ULTIMO PYRMONT PUBLIC SCHOOL

Revision 1
Date 11 March 2019
Made by Emily Rowe and David Ford
Checked by Victoria Sedwick
Approved by Victoria Sedwick
Description Independent Environmental Audit of Ultimo Pyrmont Public School
Ref: 318000619

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# GLOSSARY

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<tr>
<td>ARI</td>
<td>Average Recurrence Interval</td>
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<td>CEMP</td>
<td>Construction Environmental Management Plan</td>
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<td>CCS</td>
<td>Community Communications Strategy</td>
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<td>CNVMP</td>
<td>Construction Noise and Vibration Management Plan</td>
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<td>CSWMP</td>
<td>Construction Soil and Water Management Plan</td>
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<td>CTPMP</td>
<td>Construction Traffic and Pedestrian Management Plan</td>
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<td>CWMP</td>
<td>Construction Waste Management Plan</td>
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<td>DoE</td>
<td>NSW Department of Education</td>
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<td>DPE</td>
<td>NSW Department of Planning &amp; Environment</td>
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<td>Environmental Impact Statement</td>
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<td>Environmental Management System</td>
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<td>Excavated Natural Material</td>
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<td>NSW Environment Protection Authority</td>
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<td>Environment Protection Licence</td>
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<td>ESCP</td>
<td>Erosion and Sediment Control Plan</td>
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<td>Interim Construction Noise Guideline</td>
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<td>IEA</td>
<td>Independent Environmental Audit</td>
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<td>ISO</td>
<td>International Organisation for Standardisation</td>
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<td>MRF</td>
<td>Materials Recycling Facility</td>
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<td>NSW</td>
<td>New South Wales</td>
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<td>POEO</td>
<td>Protection of the Environment Operations (Act or Regulation)</td>
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<td>RAP</td>
<td>Remedial Action Plan</td>
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<td>RTS</td>
<td>Response to Submissions Report</td>
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<td>SINSW</td>
<td>School Infrastructure NSW</td>
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<td>SSD</td>
<td>State Significant Development</td>
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<td>VENM</td>
<td>Virgin Excavated Natural Material</td>
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<td>WMP</td>
<td>Water Management Plan</td>
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<td>Water Management System</td>
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1. **EXECUTIVE SUMMARY**

The Department of Education (DoE) engaged Ramboll Australia Pty Ltd (Ramboll) to conduct a program of Independent Environmental Audits for the construction and operation of the new Ultimo Pyrmont Public School, herein referred to as Ultimo Public School. DoE is constructing the school at 47-53 Jones Street, Ultimo, New South Wales (NSW) on the location of the previous school. When operational, the school will have capacity for up to 800 students from Kindergarten through to Year 6 as well as a 40-space child care centre. The development was approved by the Planning Assessment Commission of New South Wales as State Significant Development under Development Consent SSD 7503, dated 13 July 2018. The DoE is the “Applicant” for the purpose of SSD 7503. The Independent Environmental Audit (IEA) program is required under Conditions B54 to B56 of SSD 7503.

An Audit Program for the conduct of the IEAs was prepared for the Applicant by Ramboll and submitted to the Department of Planning and Environment (DPE) on 29 November 2018. The Audit Program was divided into three audits targeting the three phases of the development: 1) Prior to commencement of works; 2) During construction; and 3) Occupation. At the time of preparing the Audit Program and commencing this first audit (the Audit), construction had already commenced. The Audit Program and scope of this first Audit were revised on 25 January 2019 following discussions with the DPE to ensure that all Part A and Part B conditions and relevant Part C conditions were audited.

The Auditors assessed the development to be generally compliant with the conditions of Development Consent SSD 7503, with the exception of:

- Non-compliances relating to meeting timeframes under Conditions A7, B7, B17, B18, B38, B51, B52 and B54. These non-compliances are considered to be administrative in nature and most had been addressed prior to commencing the Audit. As such, no recommendations are made in relation to these conditions; and

- Three additional non-compliances with Conditions A18, B37 and C18, two of which have recommended actions. The details are provided as follows:
  - **Condition A18** - The accidental removal of a small street tree without Council approval was reported to Council and corrective action agreed. As the matter was resolved, it was not included in the incident register. The Auditors consider this to be a non-compliance with Condition A18, as an incident (as defined in SSD 7503) should have been notified to the DPE. The Auditors have made recommendations in relation to the definition of an incident and notification requirements to be included in documentation.
  - **Condition B37** – The Construction Traffic and Pedestrian Management Plan (CTPMP) had been prepared and submitted to Council and accepted by the Certifying Authority. However, the Auditors consider that the plan does not adequately address all requirements of Condition B37 and have made recommendations.
  - **Condition C18(a)** - Council had approved removal of two large street trees on Wattle Street; however, a small tree that had not been approved was also removed. Council was notified and an agreement has been reached with Council for replacement of the tree at the completion of construction. No Audit recommendation is made in this regard.

The Auditors consider management of the project by the Construction Contractor to be of a generally good standard, despite the aforementioned non-compliances. Management systems and environmental performance of the development are considered to be adequate for the stage of development. A number of opportunities for improvement were also identified.
2. INTRODUCTION

2.1 Background
The Department of Education (DoE) engaged Ramboll Australia Pty Ltd (Ramboll) to conduct a program of Independent Environmental Audits for the construction and operation of the new Ultimo Pyrmont Public School, herein referred to as Ultimo Public School. DoE is constructing the school at 47-53 Jones Street, Ultimo, New South Wales (NSW) on the location of the previous school. When operational, the school will have capacity for up to 800 students from Kindergarten through to Year 6 as well as a 40-space child care centre. The development was approved by the Planning Assessment Commission of New South Wales as State Significant Development under Development Consent SSD 7503, dated 13 July 2018. The DoE is the “Applicant” for the purpose of SSD 7503. The Independent Environmental Audit (IEA) program is required under Conditions B54 to B56 of SSD 7503.

Under Schedule 2 of SSD 7503, the Conditions are divided into five parts as follows:

- Part A Administrative Conditions
- Part B Prior to Commencement of Works
- Part C During Construction
- Part D Prior to Occupation or Commencement of Use
- Part E Post Occupation

At the time of the first IEA (this Audit), the previous school had already been demolished and an environmental site investigation undertaken. The site is subject to an Environmental Site Assessment and Remediation Action Plan (Environmental Investigation Services, 31 May 2018) and must be remediated accordingly under SSD 7503 Conditions B42 to B47.

An Audit Program for the conduct of the IEAs was prepared for the Applicant by Ramboll and submitted to the Department of Planning and Environment (DPE) on 29 November 2018. The Audit Program was divided into three audits targeting the three phases of the development: 1) Prior to commencement of works; 2) During construction; and 3) Occupation. At the time of preparing the Audit Program and commencing this first audit (the Audit), construction had already commenced. The Audit Program and scope of this first Audit were revised on 25 January 2019 following discussions with the DPE to ensure that all Part A and Part B conditions and relevant Part C conditions were audited.

The following parties are relevant to the development and compliance with the conditions of consent:

- DoE School Infrastructure (the Applicant).
- HKA (Project Manager on behalf of the Applicant).
- Hindmarsh Constructions Australia (Construction Contractor).
- BCA Logic (Certifying Authority)

2.2 Audit Team
The Audit Team comprised Victoria Sedwick (Lead Auditor), David Ford (Auditor) and Emily Rowe (Auditor) of Ramboll. The Audit Report was prepared by the Auditors and reviewed and authorised by the Lead Auditor.

2.3 Audit Objectives
The objective of the Audit was to independently and objectively assess the environmental performance and compliance status of the development during the Audit Period.
2.4 Audit Scope

The scope for the Audit is taken from the Audit Program, which was based on SSD 7503 Condition 55, as follows:

“This audit will:

a) Assess the documentation prepared prior to commencement of construction to ensure the environmental performance of the development and to manage its effects on the surrounding environment, including the community;

b) Assess whether the development is complying with the terms of the consent as they apply at the time of the audit;

c) Assess the environmental performance of the development, including compliance with construction environmental management plans; and

d) Recommend measures or actions to improve the environmental performance of the development, and improvements to relevant documents required under the consent.”

The Audit assessed the following SSD 7503 Conditions in accordance with the Audit Program:

- "All Part A conditions of consent (Administrative Conditions);
- All Part B conditions of consent (Prior to Commencement of Works);
- All Part C conditions of consent (During Construction) – noting that some Part C conditions may not have been triggered at the time of this audit;
- All Part D conditions of consent (Prior to Occupation or Commencement of Use) – it is anticipated that most Part D conditions will be reported as "Not triggered" at the time of this audit; and
- All Part E conditions of consent (Post Occupation) – it is anticipated that all Part E conditions will be reported as "Not triggered" at the time of this audit.”

2.5 Audit Period

This is the first Independent Environmental Audit for this development. The Audit Period is from the issue of Development Consent SSD 7503 on 13 July 2018 to the date of the Audit site visit on 1 February 2019.

3. AUDIT METHODOLOGY

3.1 Selection and Endorsement of Audit Team

All of the Ramboll Auditors referred to in Section 2.2 have training and extensive experience in conducting environmental compliance audits and are independent from the Department of Education. Victoria Sedwick is a certified Lead Auditor with Exemplar Global (Certificate No. 13180). A declaration of the independence of the Audit Team was submitted to the NSW Department of Planning and Environment (DPE) in a letter dated 6 December 2018 (Appendix B).

3.2 Independent Audit Scope Development

As discussed in Section 2.1, the scope for the Audit was developed to assess the development’s environmental performance in relation to pre-construction conditions of Development Consent SSD 7503, which included all post approval documents prepared to satisfy the conditions relevant to the pre-construction stage of development and the construction stage.

3.3 Compliance Evaluation

The following forms of evidence were gathered during the conduct of the Audit:

- Site inspection of 47-53 Jones Street, Ultimo, which included the taking of photographs;
- Review of documents, reports and other records including approvals, licences, reports prepared to satisfy the conditions, site inspection checklists, site plans and drawings, as well as correspondence between the DoE or its various agents with authorities including, but not limited to, the DPE, City of Sydney (Council); and Roads and Maritime Services (RMS).
• Interviews with project personnel (refer Section 3.4);
• Review of documents available on the internet including DoE and DPE websites.

3.4 Site Inspection and Interviews
The development at 47-53 Jones Street, Ultimo was inspected by the Auditor, David Ford, on 1 February 2019. There were no inaccessible areas. The following personnel were interviewed on the same day:

• Michael Howell, Construction Project Manager, Hindmarsh Constructions.
• Suzana Cosic, Project Manager, HKA.

A second interview with these personnel was undertaken by the Auditors, David Ford and Emily Rowe, on 26 February 2019. A third interview was undertaken with a representative of the Applicant, David Spare, Project Director, the HKA Project Manager and all Auditors on 6 March 2019.

3.5 Consultation
The DPE was consulted concerning the scope of this first Audit and on the interpretation of the definitions of “Construction” and “Building works” in the consent.

The DPE was also asked if there were any specific concerns with the development. The DPE had written to the Applicant on 3 December 2019 raising concerns over the timing and standard of the Pre-construction Compliance Report (Conditions B52 and B53) and the timing of satisfying Conditions B1 and B54. Other than these issues, no specific concerns were raised.

3.6 Compliance Status Descriptors
Although not specifically referenced in Development Consent SSD 7503, this Audit Report has been prepared generally in accordance with the DPE’s Independent Audit Post Approval Requirements (June 2018). As such, the following compliance status descriptors have been used:

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 have also been made that identify opportunities for improvement.

4. AUDIT FINDINGS

4.1 Approval and Document List
The following documents were provided to the Auditors:

• Email from DesignInc to AMAC Group, 25 January 2018, Re: Ultimo Public School - Aboriginal Cultural Heritage/Archaeology works – fee approval, attached ‘AMAC Group Fee Proposal – Ultimo Pyrmont Public School.
• Development Consent SSD 7503, 13 July 2018
- Modification of Development Consent, SSD 7503 MOD 1: modifications to conditions B5; B11; B13; B16; B42; B44; B45; and B46, 21 September 2018.
- Modification of Development Consent, SSD 7503 MOD 2: modifications to conditions A7; A8; and A9, 23 October 2018.
- Hindmarsh, Environmental Management & Sustainability Plan (EMP), Ultimo Public School, Rev 4, 15 August 2018.
- Email from Hindmarsh to HKA and BCA Logic, 16 August 2018, with two Dilapidation Reports attached:
  - Property Condition Survey, Project: Ultimo Public School, Ultimo, Site Surveyed: Council Assets, Jones Street, Quarry Street, Wattle Street, Ultimo NSW 2037, Inspection Date 10 August 2018, Job Reference: AD2482B, Australian Dilapidations.
- Email from HKA to DPE dated 17 August 2018 with Dilapidation Reports, Parts 1 and 2, attached (as above).
- Email from Hindmarsh to DPE, cc BCA Logic and HKA, dated 22 August 2018 with two Ausgrid documents attached:
  - Ausgrid email, 17 May 2017, addressed to JHA Engineers
  - Ausgrid Design Information, Site Specific Requirements – Complex, 17 May 2017
- ANZ Guarantee No. DG714423418, Date of issue: 10 August 2018, Received by City of Sydney on 24 August 2018.
- ANZ Guarantee No. DG712663418, Date of issue: 10 August 2018, Received by City of Sydney on 24 August 2018.
- Email from Hindmarsh to BCA Logic, 24 August 2018, attached 'Excavation Director letter'.
- Emails between AMAC Group and Hindmarsh Re: Ultimo Public School SSD/DA Conditions, dated between 29 to 30 August 2018.
- Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018.
- Just Skip Bins, Waste Management Plan, Hindmarsh, Ultimo Public School, not dated.
- Email from Hindmarsh to BCA Logic with attached Erosion and Sediment Control Plan, Revision F, 31 August 2018.
- Hindmarsh, Community Communications Strategy, Ultimo Public School, Rev 0, 4 September 2018.
• Hindmarsh, Environmental Management & Sustainability Plan (EMP), Ultimo Public School, Rev 7, 5 September 2018.

• Email from HKA to DPE, RE: SSD 7503 Conditions B28, B29 and B30, 5 September 2018, with the attachment ‘160204 - Ultimo Pyrmont Public School - CNVMP - Rev B.pdf’.

• Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018.

• City of Sydney Approval of Work Zones, 47-53 Jones Street, Ultimo, TRIM Ref: 2018/397783, 2 October 2018.

• Email from City of Sydney to Hindmarsh, Subject: SSD 7503 – Requirement for consultation with the City of Sydney in accordance with conditions of consent for Ultimo School Redevelopment, 5 October 2018.

• Aconex Transmittal note from DesignInc to BCA Logic, 15 October 2018, with attached Aboriginal Cultural Heritage Management Plan (ACHMP), Draft v1 (18/05/2018) and Final v2 (12/10/2018). The attachments were not attached for the Auditors but the latter document was provided separately.

• Archaeological Management & Consulting Group and Streat Archaeological Services Pty Ltd, Aboriginal Cultural Heritage Management Plan, Lot 101 DP 1105527, Ultimo Public School, 189 Jones Street, Ultimo NSW (Sydney LGA), Final (Version 2), 12 October 2018.

• Hindmarsh Site Instruction email (Reference number: Hindmars-GCOR-000307), Re: Asbestos Removal, 24 October 2018.

• Crane Licence – Partial Road/Lane Closure, issued by City of Sydney, 8 November 2018.

• Email from RMS (OPLINC) to Hindmarsh, 16 November 2018, regarding OPLINC Road Occupancy Application Received.

• Email from Hindmarsh to HKA regarding Wattle St Trees, Reference number Hindmars-EW-000011, 12 November 2018.

• Email from Hindmarsh to RMS, 23 November 2018, regarding proposed crane erection.

• Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-1, 23 November 2018.

• Email from HKA to DPE and BCA Logic, RE: SSD 7503 – Condition 52, Attachment: Condt B53 106876-ltr-1 Pre-commencement Conditions 23.11.18 (3).pdf, 27 November 2018.

• Email from DPE to HKA, Subject: Ultimo Public School SSD 7503 – condition B52 & Condition B1, 3 December 2018.

• Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-2, 4 December 2018.

• Road Occupancy Licence, Licence, Transport Management Centre, 5-12 December 2018

• HKA, SSD7503 Consent, Condition B52 – Pre-Commencement Compliance Report, Revision 2, 6 December 2018.

• Hindmarsh, Emergency Management Plan (EMMP), Ultimo Public School, Rev 5, 9 January 2018.

• Email from DPE to HKA, Subject: Ultimo Public School SSD 7503 – condition B52 & Condition B1, 3 December 2018.

• Letter from DoE to DPE Re. Submission of Evidence of Consultant Appointment letter, 10 January 2019, with the following letter attached.
Letter from Hindmarsh to HKA regarding Consultant Appointment, dated 8 January 2019.

- Letter from SINSW to DPE, Ultimo PS Project and SSD 7503: Submission of Ultimo PS SSD 7503 Condition B52 Pre Construction Reporting in accordance with SSD 75036 Condition B52, 11 January 2018, Attachments as follows:
  - Ultimo PS SSD 7503 Pre-Construction Compliance Report Rev 3 (including SSD 7503 Consent Matrix) (Date 10/01/2019)
  - Certifying Authority Letter Endorsing Pre Construction compliance Report 106876-ltr-5 (Date 11/01/2019)


- Hindmarsh Site Induction, Powerpoint slide presentation, not dated.

- Email from HKA to DPE, Re: SSD 7503 – Condition B54, with the attached document, Ultimo PS – Program for IEA_F1, 29 November 2018.

- Email from DPE to HKA, Subject: Ultimo Public School SSD 7503 – condition B52 & Condition B1, 3 December 2018.

- Email from HKA to DPE, 6 December 2018, Re: Ultimo Public School SSD 7503 – Condition B52 & Condition B1, Attachments as follows:
  - Letter from HKA to DPE Re. Ultimo Public School SSD 7503 Consent – Conditions B52 and B1, 7 December 2018
  - SSD 7503 Condition B52 Pre-Commencement Compliance Report, Rev 2, 6 December 2018.
  - Letter from BCA Logic to HKA, 4 December 2018 Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School, Stage 1 works – Structural Works below Ground Floor Slab Level

- School Infrastructure NSW (SINSW), Community Engagement Plan, Ultimo Public School, November 2018.


- Notice of intent to remove non-friable asbestos, notification number 940R-00208234-01, 12 October 2018.

4.2 Compliance Performance

Development Consent SSD 7503 contains conditions which required actions to be undertaken by various development timeframes. For the purpose of assessing compliance against these conditions, the following dates have been used:

- **Commencement of works**: 22 August 2018, as stated in the Pre-Construction Compliance Report (HKA, 10 January 2019) as the “date of commencement of construction” however, the Auditors understand that the works commenced were initial site set up and archaeological testing, which are considered to be ‘early works’ as defined in the consent.
- **Commencement of construction**: 11 September 2018, being the date on which excavation equipment for the cut and fill earthworks arrived at the site. Works prior to this date are considered to be ‘early works’ and therefore not considered to be construction as defined in the consent.
- **Commencement of physical works**: 11 September 2018, as for construction works.
- **Commencement of building works**: 16 October 2018, being the date on which the first Crown Certificate under Section 6.28(2) of the Environmental Planning and Assessment Act 1979 was issued.
- **Commencement of above ground works**: 8 January 2019, being the date on which the second Crown Certificate under Section 6.28(2) of the Environmental Planning and Assessment Act 1979 was issued.

The Auditors assessed the development to be compliant with Development Consent SSD 7503 except as follows in this section. Refer to Section 5.1 for recommended actions. Refer to the Independent Audit Tables (Appendix A) for full details of the identified non-compliances and compliance status of other conditions.

**Non-compliances**

Eight conditions have been assessed as being non-compliant only on the basis that the required timeframe in the condition was not met, for example, submission of a plan or a report to the DPE prior to commencement of construction. Conditions that fall into this category are A7; B7; B17; B18; B38; B51; B52; and B54. In all of these cases, the requirements of the condition were met except for submission within the required timeframe. The Auditors consider that there was no resultant environmental impact. As these non-compliances have been corrected, the Auditors have made no recommendations for further action.

Other non-compliances identified are:

- **Condition A18** - There has been a non-compliance with Condition C18(a) concerning the accidental removal of a small street tree without Council approval. This was reported to Council and corrective action agreed. As the matter was resolved, it was not included on the incident register. The Auditors consider non-compliance to be an incident (as defined in SSD 7503) that should have been notified to the DPE.
- **Condition B37** – The Construction Traffic and Pedestrian Management Plan (CTPMP) had been been prepared and submitted to Council and accepted by the Certifying Authority. However, the Auditors consider that the plan does not adequately address all
requirements of Condition B37 and have made recommendations to adequately address the following requirements of Condition B37:

- distinguish vehicle types for the traffic routes map;
- indicate partial road closure lanes, alternate routes
- include discussion of construction impacts, their nature and duration, on traffic, public transport, pedestrians, cyclists, property access, particularly for example, oversize load movements;
- include discussion of cumulative construction impacts on the surrounding road network, if there are other construction projects in the vicinity of the site;
- include details of measures for how connectivity for cyclists / cycle routes are maintained; and
- include an adaptive response plan to traffic, construction or other incident.

- **Condition C18(a)** – As noted above, Council had approved removal of two large street trees on Wattle Street; however, a small tree that had not been approved was also removed. Council was notified and an agreement has been reached with Council for replacement of the tree at the completion of construction. As such, no Audit recommendation is made in this regard.

### 4.3 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

No Agency Notices, Orders, Penalty Notices or Prosecutions have been issued in relation to the development.

### 4.4 Previous Audit Recommendations

This is the first IEA and, as such, there are no previous audit recommendations for this development.

### 4.5 EMP, Sub-plans and Post Approval Documents

The EMP, sub-plans and post approval documents are considered to be generally adequate. A number of opportunities for improvement are identified in Section 4.14.

### 4.6 EMS

The development is being constructed under the Construction contractor’s management system. Given the stage of development of the site, the Auditors consider the management system to be generally appropriate.

### 4.7 Environmental performance

Management system and environmental performance of the development are considered by the Auditors to be adequate for the stage of development. A number of conditions have been assessed as being non-compliant only on the basis that the required timeframe in the condition was not met and the Auditors note that these non-compliances have been corrected and do not have an ongoing impact on the environmental performance of the development.

The Auditors have identified opportunities to improve the environmental performance of the development. These are outlined in Section 4.14 with recommended actions provided in Section 5.2.

### 4.8 Complaints

Four complaints have been recorded:

- Two noise complaints were received during early works in August 2018 which related to a temporary generator that had been located near the southern site boundary.
- A third noise complaint was recorded in early November 2018. The Construction Project Manager visited the managing agent for the neighbouring building to discuss the permitted working hours and the need, on occasions, to bring plant to site out of normal hours due to traffic restrictions.
Sediment overflowed to an adjoining property during a high rainfall event in late November 2018. The damage to the adjoining property was rectified by the Construction Contractor. No complaints have been recorded since November 2018.

4.9 Incidents
Three environmental incidents are recorded in the Construction Contractor’s Incident Register:
- Concrete spilled from a concrete mixer as it entered the site from Quarry Street on 13 November 2018. The spill was contained and cleaned up.
- Sediment overflowed to an adjoining property during a high rainfall event in late November 2018. The damage to the adjoining property was rectified by the Construction Contractor.
- A suspected gas leak was reported on 12 November 2018.

As noted in Section 4.2, the Auditors consider that another event (a small tree removal) should have been included as an incident and make a recommendation in this regards in Section 5.1.

4.10 Actual Verses Predicted Environmental Impacts
The Auditors have not identified actual environmental impacts that are inconsistent with predicted impacts with the exception of:
- Accidental removal of a small street tree on Wattle Street (which will be replaced).
- Overflow of sediment to an adjoining property during a high rainfall event (which has been rectified).

4.11 Site Inspection
The Auditor, David Ford, carried out a site inspection on 1 February 2019 accompanied by the Construction Project Manager. Photographs taken during the site visit are provided in Appendix D.

4.12 Site interviews
Interviews were conducted in the Hindmarsh project office near the development site on 1 February 2019 and 26 February 2019 with:
- Michael Howell, Construction Project Manager, Hindmarsh Constructions.
- Suzana Cosic, Project Manager, HKA.

4.13 Previous Annual Review or Compliance Report Recommendations
No Annual Reviews have been conducted (and are not required under the conditions of consent). No recommendations were made in the Pre-construction Compliance Report.

The Construction Compliance Report identified four areas of non-compliance (Condition B16) or "partial non-compliance" (Conditions B56, C25 and C26); however, no specific recommendations were made. The Auditors note that these conditions are not considered non-compliant at the time of this Audit.

4.14 Improvement Opportunities
The following area have been identified as opportunities for improvement. Refer to Section 5.2 for recommended actions.
- Site Induction - AMAC Group approved the site induction approach but recommended that the induction presentation be amended to provide more detail about requirements for Aboriginal and non-aboriginal heritage. This change was not made.
- Construction Noise and Vibration Management Plan (CNVMP) - The CNVMP includes a section on complaints which recommends various procedures to be followed. However, the CEMP and CCS do not cross-reference the CNVMP.
• **Erosion and Sediment Control Plan (ESCP)** - It was not clear to the Auditors how the ESCP addresses stormwater flows for small and large sized rain events, including 1 in 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI.

• **Complaints Management System** - The Auditors consider that the Complaint Register referred to in the CCS forms the basis of a Complaints Management System and is broadly complaint with the requirements of the consent; however, neither the CCS nor the CEMP specifically refer to a Complaints Management System.

• **Unexpected Finds** - There are a number of management plans including the CEMP, the Emergency Management Plan (EMMP) and the RAP that contain unexpected finds procedures to varying levels of detail. None of the procedures refer to requirement to submit the disposal location and results of testing to the DPE prior to removal of the material from the site.

4.15 **Key Strengths**

Despite a number of non-compliances, mostly relating to Part B (Prior to Commencement of Works) Conditions, the Auditors consider management of the project by the Construction Contractor to be of a generally good standard. Recommendations have been made in Section 5.2 to further improve management systems and environmental performance.

5. **RECOMMENDATIONS AND OPPORTUNITIES FOR IMPROVEMENT**

5.1 **Recommendations in Relation to Non-compliances**

- **Condition A18** - Management plans, particularly the CEMP and Emergency Management Plan, should be reviewed to clarify sections regarding incident response and notification requirements. The CEMP should define an incident in accordance with the definition in SSD 7503 and make it clear that incidents include non-compliances. The Auditors acknowledge that a number of non-compliances relating to the timing of complying with some Part B (Prior to Commencement of Works) conditions did not warrant inclusion on the incident register; however, moving forward, all non-compliances with Part C (During Construction) conditions should be considered to be incidents.

- **Condition B37** - It is recommended that the CTPMP be updated to:
  - distinguish vehicle types for the traffic routes map;
  - indicate partial road closure lanes, alternate routes
  - include discussion of construction impacts, their nature and duration, on traffic, public transport, pedestrians, cyclists, property access, particularly for example, oversize load movements;
  - include discussion of cumulative construction impacts on the surrounding road network, if there are other construction projects in the vicinity of the site;
  - include details of measures for how connectivity for cyclists / cycle routes are maintained; and
  - include an adaptive response plan to traffic, construction or other incident.

5.2 **Recommendations in Relation to Opportunities for Improvement**

- **Site Induction** - Unless civil works are complete, the site induction presentation for personnel involved in excavation and civil works should be updated to include the amendments recommended by AMAC.
• **Construction Noise and Vibration Management Plan (CNVMP)** - Cross reference the CEMP and CCS with the CNVMP to ensure consistency and that complaints are followed up appropriately as recommended in the CNVMP.

• **Erosion and Sediment Control Plan (ESCP)** - The ESCP (and/or CEMP) be reviewed to clarify measures to manage stormwater flow in small and large sized rain events.

• **Complaints Management System** - The CCS and CEMP should be updated to include reference to a Complaint Management System that describes the Complaint Register and the information it contains, specifically including the information required under Condition B41. A field could be added to the Complaints Register for the nature of the complaint e.g. Noise, Vibration, Air, Water, Traffic.

• **Unexpected Finds** - Prepare a single unexpected finds protocol for contaminated material, including asbestos, that meets all of the requirements of Condition B48, including provision of information to the DPE. The same protocol could be attached to all of the relevant management plans including the CEMP, CWMP, EMMP, AMP and RAP, as considered appropriate, in order to ensure a consistent approach.

6. **CONCLUSIONS**

The Auditors assessed the development to be generally compliant with the conditions of Development Consent SSD 7503 with the exception of:

- Eight non-compliances were identified relating to meeting timeframes in conditions. These non-compliances are considered to be of an administrative nature and have been corrected. As such, no recommendations are made in relation to these conditions; and
- Three additional non-compliances were identified, two of which have recommended actions.

Management systems and environmental performance of the development are considered to be adequate for the stage of development. A number of opportunities for improvement were also identified.
APPENDIX A
INDEPENDENT AUDIT TABLES
### Table A-1: Compliance with Development Consent SSD 7503 Part A Conditions

<table>
<thead>
<tr>
<th>APPROVAL (ID)</th>
<th>REQUIREMENT</th>
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<th>COMPLIANCE STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1</td>
<td>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.</td>
<td>The Auditors have observed no evidence that all reasonable and feasible measures are not being implemented to prevent or minimise material harm to the environment.</td>
<td>Compliant</td>
<td></td>
</tr>
<tr>
<td>A2</td>
<td>The development may only be carried out: a) in compliance with the conditions of this consent; b) in accordance with all written directions of the Planning Secretary; c) in accordance with the EIS and Response to Submissions and RtS Addendum; d) in accordance with the approved plans in the table below: (refer to Table provided in Consent)</td>
<td></td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td>A3</td>
<td>Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and b) the implementation of any actions or measures contained in any such document referred to in (a) above. 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</td>
<td>Email from DPE to HKA, Subject: Ultimo Public School SSD 7503 – condition B52 &amp; Condition B1, 3 December 2018. The DPE provided written directions to HKA on the content of a pre-construction compliance report as well as correspondence for the submission of documents to the Planning Secretary. The Applicant subsequently submitted a revised pre-construction compliance report and correspondence conforming to DPE’s requirements.</td>
<td>Compliant</td>
<td></td>
</tr>
</tbody>
</table>
### Table A-1: Compliance with Development Consent SSD 7503 Part A Conditions

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>A4</td>
<td>If there is any inconsistency between the plans and documentation referred to above the most recent document must prevail to the extent of the inconsistency. However, conditions of this consent prevail to the extent of any inconsistency. Where there is an inconsistency between approved elevations and plans, the elevations prevail.</td>
<td></td>
<td></td>
<td>Noted</td>
</tr>
</tbody>
</table>
| A5            | 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).  
If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required | The Development has not been staged. | Noted             |
### Table A-1: Compliance with Development Consent SSD 7503 Part A Conditions

<table>
<thead>
<tr>
<th>Approval ID</th>
<th>Requirement</th>
<th>Evidence Collected</th>
<th>Independent Audit Findings and Recommendations</th>
<th>Compliance Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>A6</td>
<td>Where conditions of this consent require consultation with an identified party, the Applicant must:</td>
<td>A6 Where conditions of this consent require consultation with an identified party, the Applicant must:</td>
<td>In general, the Applicant undertook consultation as required under a number of the Conditions with exceptions identified in this table specific to the relevant Condition.</td>
<td>Noted</td>
</tr>
<tr>
<td></td>
<td>- a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and</td>
<td>- a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and</td>
<td></td>
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<tr>
<td></td>
<td>- b) provide details of the consultation undertaken including:</td>
<td>- b) provide details of the consultation undertaken including:</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>- i) a description of how matters raised by those consulted have been resolved to the satisfaction of both the Applicant and the party consulted; and</td>
<td>- i) a description of how matters raised by those consulted have been resolved to the satisfaction of both the Applicant and the party consulted; and</td>
<td></td>
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<tr>
<td></td>
<td>- ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</td>
<td>- ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</td>
<td></td>
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</tr>
<tr>
<td>A7 (as modified)</td>
<td>In order to ensure the design quality excellence of the development is retained:</td>
<td>- Letter from School Infrastructure NSW (SINSW) to DPE Re. Submission of Evidence of Consultant Appointment letter, 10 January 2019, following letter attached.</td>
<td>Based on the information provided, the Auditors consider this Condition to be compliant with respect to meeting the requirements of Condition A7 but non-compliant with respect to timing of the submission of evidence to the DPE. No further action is recommended.</td>
<td>Non-compliant</td>
</tr>
<tr>
<td></td>
<td>- a) the design architect (Designinc + LacosteStephenson + bm2) is to have direct involvement in the design documentation and construction of the development;</td>
<td>- b) the design architect is to have full access to the Site and is to be instructed by the Applicant to respond directly to the consent authority where information or clarification is required in the resolution of the design issues throughout the construction of the development; and</td>
<td></td>
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<td></td>
<td>- b) the design architect is to have full access to the Site and is to be instructed by the Applicant to respond directly to the consent authority where information or clarification is required in the resolution of the design issues throughout the construction of the development; and</td>
<td>- c) evidence of the design architect's commission is to be provided to the Planning Secretary prior to</td>
<td></td>
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<td></td>
<td>- c) evidence of the design architect’s commission is to be provided to the Planning Secretary prior to</td>
<td>- c) evidence of the design architect’s commission is to be provided to the Planning Secretary prior to</td>
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<td></td>
<td>- Letter from Hindmarsh to HKA regarding Consultant Appointment, dated 8 January 2019.</td>
<td>- Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental</td>
<td></td>
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<td></td>
<td>- Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental</td>
<td>- Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental</td>
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</table>

Based on the information provided, the Auditors consider this Condition to be compliant with respect to meeting the requirements of Condition A7 but non-compliant with respect to timing of the submission of evidence to the DPE. No further action is recommended. The Hindmarsh letter confirms that architecture firm DesignInc have signed a novation agreement with Hindmarsh. They are acting as the lead architecture firm.
<table>
<thead>
<tr>
<th>APPROVAL (ID)</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>certification of any building works, except for Site preparatory works.</td>
<td>Planning &amp; Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Structural Works Below Ground Floor Slab Level, 16 October 2018. • Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning &amp; Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Main Works, 8 January 2018.</td>
<td>consultant with Lacoste + Stevenson and bm2 as sub consultants. BCA issued a Crown Certificate for the structural works below ground floor slab level on 16 October 2019. BCA issued a Crown Certificate for the main works on 8 January 2019. The Applicant advised DPE of the evidence of appointing the architect on 10 January 2019, which was post commencement of building works (16 October 2018).</td>
<td></td>
</tr>
<tr>
<td>A8 (as modified)</td>
<td>The design architect for the project may only be terminated if the Department of Education has demonstrated to the satisfaction of the Planning Secretary and the Government Architect’s Office that sufficient grounds exist to terminate the contract.</td>
<td>DesignInc is still engaged on the development.</td>
<td>Compliant</td>
<td></td>
</tr>
<tr>
<td>A9 (as modified)</td>
<td>To ensure design integrity is maintained, the opinion of the DIP is to be obtained where any significant design change is required, including substitution of approved materials, or design changes to other elements identified as critical in the DIP reports. A copy of any opinion issued by the DIP must be provided to the satisfaction of the Planning Secretary prior to the finalisation of construction drawings. • Interview with Project Manager and Construction Project Manager.</td>
<td>There have been no significant design changes.</td>
<td>Compliant</td>
<td></td>
</tr>
<tr>
<td>A10</td>
<td>This consent will lapse five years from the date of consent unless the works associated with the development have physically commenced.</td>
<td></td>
<td>Not triggered</td>
<td></td>
</tr>
<tr>
<td>A11</td>
<td>The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&amp;A Regulation. • Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning &amp; Assessment Act, 1979</td>
<td>Crown Certificates issued by the Certifying Authority on the basis of Design Certificates and Statements indicate that the development is being</td>
<td>Compliant</td>
<td></td>
</tr>
<tr>
<td>Approval (ID)</td>
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<td>Independent Audit Findings and Recommendations</td>
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<td>A12</td>
<td>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.</td>
<td>- Interview with Project Manager and Construction Project Manager.</td>
<td>No disputes or other matters have been referred to the DPE.</td>
<td>Compliant</td>
</tr>
<tr>
<td>A13</td>
<td>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.</td>
<td>- Interview with Project Manager and Construction Project Manager.</td>
<td>A Long Service Levy has reportedly been paid.</td>
<td>Compliant</td>
</tr>
<tr>
<td>A14</td>
<td>Any advice or notice to the consent authority must be served on the Planning Secretary.</td>
<td>- Hindmarsh Site Induction presentation</td>
<td>The Auditors understand that the Applicant has not served advice or notices to the Planning Secretary or other parties.</td>
<td>Not triggered</td>
</tr>
<tr>
<td>A15</td>
<td>The Applicant must ensure that all 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.</td>
<td>- Hindmarsh Site Induction presentation</td>
<td>The Hindmarsh Site Specific Induction presentation includes Site Rules including Slide 21 relating to the Development Approval Conditions and a requirement for “all parties ... to manage</td>
<td>Compliant</td>
</tr>
</tbody>
</table>
Table A-1: Compliance with Development Consent SSD 7503 Part A Conditions

<table>
<thead>
<tr>
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</tr>
</thead>
</table>
|               |             |                    | the works that they are responsible for, to meet these Conditions”. Slide 21 refers to conditions relating to site access, traffic management, noise restrictions, tree protection, waste and water containment, Aboriginal and European heritage, compliance with various management plans. “All parties are to manage the works that they are responsible for, to meet these Conditions”. Slide 22 Incident reporting – “All injuries / incidents shall be reported as soon as is practicable after the injury / incident occurring”. “Statutory reporting such as notification to the Regulator of incidents is the Sub-contractor's responsibility and any notifications must be provided to Hindmarsh”. Slide 26 regarding Legislation and codes of practice does not refer to environmental legislation. Slide 38 covers housekeeping focussing on removal of rubbish and cleaning work areas each day. Slide 39 covers "Environmental" requirements including:  
  • Not altering sediment erosion controls  
  • Not pumping contaminated water to sewer or stormwater systems  
  • Immediate reporting of Aboriginal relics |
Table A-1: Compliance with Development Consent SSD 7503 Part A Conditions

<table>
<thead>
<tr>
<th>APPROVAL (ID)</th>
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</tr>
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<tbody>
<tr>
<td></td>
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<td></td>
<td>It is noted that European relics are not referred to in Slide 39, nor unexpected finds of contamination.</td>
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<td></td>
<td>The Auditors consider that the site induction slide presentation adequately makes inductees aware of, and are instructed to comply with, the conditions of SSD 7503.</td>
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<td></td>
<td>Improvement opportunities are as follows:</td>
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<td></td>
<td>• Slide 22 Incident reporting requires statutory reporting of incidents &quot;as soon as is practicable&quot;, which may not meet the immediate reporting requirement for incidents in accordance with Condition A18 or the requirements of the POEO Act 1997, Part 5.7.</td>
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<td></td>
<td>• Slide 26 should include reference to relevant environmental legislation including the EP&amp;A Act 1979 and the POEO Act 1997.</td>
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<td></td>
<td></td>
<td>• Slide 39 should include reference to all unexpected finds protocols including Aboriginal and European relics as well as contamination. Also refer to the Condition B13 recommendation.</td>
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</tr>
<tr>
<td>A16</td>
<td>The strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing that a review is being carried out, within three months of:</td>
<td>Email from HKA to DPE, 6 December 2018, Re: Ultimo Public School SSD 7503 –</td>
<td>SSD 7503 does not require an Annual Review. The Pre-Construction Compliance Report was submitted to DPE on 6 December</td>
<td>Not triggered</td>
</tr>
<tr>
<td>Approval (ID)</td>
<td>Requirement</td>
<td>Evidence Collected</td>
<td>Independent Audit Findings and Recommendations</td>
<td>Compliance Status</td>
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<tr>
<td></td>
<td>a) the submission of an Annual Review under this consent;</td>
<td>Condition B52 &amp; Condition B1, Attachments as follows:</td>
<td>2018 and then re-submitted on 11 January 2019. The applicant will need to notify the Secretary by 11 April 2019 that a review is being undertaken.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>b) the submission of a compliance report under this consent;</td>
<td>1. Letter from HKA to DPE Re. Ultimo Public School SSD 7503 Consent – Conditions B52 and B1, 7 December 2018</td>
<td>SSD 7503 Mod 1 was issued on 21 September 2018 and SSD 7503 Mod 2 was issued on 23 October 2018. The Auditors consider that these modifications did not impact strategies, plans and programs required under the consent and did not rigger a review.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>c) the submission of an incident report under this consent;</td>
<td>2. SSD 7503 Condition B52 Pre-Commencement Compliance Report, Rev 2, 6 December 2018.</td>
<td>The Applicant has not notified DPE of an incident during the Audit Period.</td>
<td></td>
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<tr>
<td></td>
<td>d) the submission of an Independent Environmental Audit under this consent;</td>
<td>3. Letter from BCA Logic to HKA, 4 December 2018 Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School, Stage 1 works – Structural Works below Ground Floor Slab Level</td>
<td></td>
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<tr>
<td></td>
<td>e) the approval of any modification to the conditions of this consent; or</td>
<td>4. Ramboll letter to SINSW Re: Independent Environmental Audit - Ultimo Public School (SSD 7503), 6 December 2018</td>
<td></td>
<td></td>
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<td></td>
<td>f) the issue of a direction of the Planning Secretary under Condition A2.</td>
<td>• Email from SINSW to DPE, 11 January 2019, Fw: Ultimo PS SSD 7503 – Condition B52 &amp; Condition B53, Attachments as follows:</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>1. Post Approval SSD 7503 Compliance cover letter DPE_Submitting Information for Conditions B52 and B53;</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>2. Certifying Authority Letter Endorsing Pre-Construction</td>
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</tbody>
</table>
Table A-1: Compliance with Development Consent SSD 7503 Part A Conditions

<table>
<thead>
<tr>
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</tr>
</thead>
</table>
| A17           | If necessary to either improve the environmental performance of the development, cater for a modification of comply with a direction, the strategies, plans and programs required under this consent must be revised and submitted: a) to the Planning Secretary’s satisfaction if previously approved by the Planning Secretary; or b) to the Planning Secretary for information. Where revisions are required, the revised document must be submitted to the Planning Secretary within six weeks of the review.  

*Note: this is to ensure the strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.*  

- Email from the SINSW to the DPE, FW: SSD 7503 – Condition B54 – Ultimo PS Independent Environmental Audit Program update, 29 January 2019.  
- Interview with Project Manager and Construction Project Manager.  

The Audit Program was revised on 25 January 2019 following discussion with the DPE concerning the scope of this first Audit. The revised Audit Program was submitted to the DPE on 29 January 2019. | Compliant |

A18 | The Planning Secretary 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.  

a) A written incident notification must also be emailed to the Planning Secretary at the following address: compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant forms the view that an incident has not occurred.  

**Written notification** of an incident must:  

- ‘Early Warning’ Email from Hindmarsh to HKA regarding Wattle St Trees, Reference number Hindmars-EW-000011, 12 November 2018.  
- Interview with Project Manager and Construction Project Manager.  

This Condition is considered by the Auditors to be non-compliant as an incident, being a non-compliance, was not notified to the DPE.  

The Applicant has not notified the DPE of any incidents, including non-compliances, with SSD 7503. The Auditors understand that no event has occurred that caused or threatened to cause material harm to the environment but there has been a non-compliance with Condition C18(a) concerning the accidental removal of a small street tree without Council approval. This was reported to Council and corrective action | Non-compliant |
### Table A-1: Compliance with Development Consent SSD 7503 Part A Conditions

<table>
<thead>
<tr>
<th>APPROVAL (ID)</th>
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</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>i) identify the development and application number;</td>
<td></td>
<td>agreed. As the matter was resolved, it was not included on the incident register. The Auditors consider non-compliance with Condition C18(a) to be an incident (as defined in SSD 7503) that should have been notified to the DPE.</td>
<td></td>
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<tr>
<td></td>
<td>ii) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);</td>
<td></td>
<td>The Auditors recommend that the management plans, particularly the CEMP and Emergency Management Plan, be reviewed to clarify sections regarding incident response and notification requirements. The CEMP Should define an incident in accordance with the definition in SSD 7503 and make it clear that incidents include non-compliances. The Auditors acknowledge that a number of non-compliances relating to the timing of complying with some Part B (Prior to Commencement of Works) conditions did not warrant inclusion on the incident register; however, moving forward all non-compliances with Part C (During Construction) conditions should be considered to be incidents.</td>
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<td></td>
<td>iii) identify how the incident was detected;</td>
<td></td>
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<td></td>
<td>iv) identify when the Applicant became aware of the incident;</td>
<td></td>
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<td></td>
<td>v) identify any actual or potential non-compliance with conditions of consent;</td>
<td></td>
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<tr>
<td></td>
<td>vi) describe what immediate steps were taken in relation to the incident;</td>
<td></td>
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<tr>
<td></td>
<td>vii) identify further action(s) that will be taken in relation to the incident;</td>
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<tr>
<td></td>
<td>viii) identify a project contact for further communication regarding the incident.</td>
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</tbody>
</table>

b) Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements for such reporting set out in this condition, and such further reports as may be requested.

The **Incident Report** must include:

i) a summary of the incident;

ii) outcomes of an incident investigation, including identification of the cause/s of the incident;

iii) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and

iv) details of any communication with other stakeholders regarding the incident.
<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>A19</td>
<td>The Planning Secretary must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Planning Secretary in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after they identify any noncompliance.</td>
<td></td>
<td>The Auditors note that this condition overlaps with Condition A18 as non-compliances are incidents as defined in SSD 703.</td>
<td>Noted</td>
</tr>
<tr>
<td>A20</td>
<td>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.</td>
<td>Letter from HKA to DPE Re. Ultimo Public School SSD 7503 Consent – Conditions B52 and B1, 7 December 2018, with Pre-Commencement Compliance Report attached, Revision 2, 6 December 2018.</td>
<td>The letter from HKA to DPE regarding the late submission of the Pre-Construction Compliance Report and the Independent Audit Program clearly identified the development and the application number, as well as the relevant condition(s) from SSD 7503 that were non-compliant. Reasons were provided for why the non-compliances had occurred and the appropriate follow-up action was stated and carried out.</td>
<td>Compliant</td>
</tr>
<tr>
<td>A21</td>
<td>Any written requirements of the Planning Secretary or relevant public authority (as determined by the Planning Secretary) which may be given at any point in time, to address the cause or impact of an incident must be complied with and within any timeframe specified by the Planning Secretary or relevant public authority.</td>
<td></td>
<td>It is understood that no written requirements have been received from the DPE addressing the cause or impact of an incident. However, DPE sent an email to HKA on 3 December 2018 in relation to Conditions B52 and B1. The DPE’s directions were complied with, as discussed above in relation to Condition A3.</td>
<td>Compliant</td>
</tr>
<tr>
<td>A22</td>
<td>If statutory notification is provided to the EPA as required under the POEO Act in relation to the project, such notification must also be provided to the Planning Secretary within 24 hours after the notification was provided to the EPA.</td>
<td></td>
<td>No incidents have occurred requiring statutory notification to the EPA (i.e. an event that causes or threatens to cause material harm to the environment) and therefore the DPE.</td>
<td>Not triggered</td>
</tr>
</tbody>
</table>
### Table A-1: Compliance with Development Consent SSD 7503 Part A Conditions

<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>A23</td>
<td>Incidents are to be notified as part of monitoring the carrying out of the Development to provide data on compliance with this consent or the environmental impact of the Development. Accordingly, Division 9.4 of the EP&amp;A Act applies.</td>
<td>Please refer to A18 findings in relation to the removal of the tree that was not notified to DPE.</td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td>A24</td>
<td>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 the EP&amp;A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification and independent environmental auditing.</td>
<td></td>
<td>Noted</td>
<td></td>
</tr>
<tr>
<td>A25</td>
<td>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</td>
<td>Email from DPE to HKA, Subject: Ultimo Public School SSD 7503 – condition B52 &amp; Condition B1, 3 December 2018.</td>
<td>Compliant</td>
<td></td>
</tr>
</tbody>
</table>

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.
Table A-1: Compliance with Development Consent SSD 7503 Part A Conditions

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</thead>
<tbody>
<tr>
<td></td>
<td>a guideline, protocol, Standard or policy, or a replacement of them.</td>
<td></td>
<td>Therefore, this is taken to represent a direction on the part of DPE to prepare required compliance reports in accordance with Compliance Reporting Post Approval Requirements.</td>
<td></td>
</tr>
<tr>
<td>A26</td>
<td>Building identification signage is not approved as part of this consent.</td>
<td></td>
<td>Noted.</td>
<td>Not triggered</td>
</tr>
</tbody>
</table>
### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>Part B – Prior to Commencement of Works</strong></td>
<td></td>
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</tr>
<tr>
<td>B1</td>
<td>The Planning Secretary, Certifying Authority and Council 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 Planning Secretary, Certifying Authority and Council 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.</td>
<td>- HKA email to DPE, RE: SSD 7503 Condition B1, 21 August 2018, Attachment as follows: 1. Letter from Hindmarsh to HKA Re. Ultimo PS - Commencement, 21 August 2018. 2. HKA email to BCA Logic RE: SSD 7503 Condition B1, 21 August 2018, with the Above Hindmarsh letter attached. 3. Hindmarsh email to City of Sydney, 20 August 2018. 4. Letter from HKA to DPE Re. Ultimo Public School SSD 7503 Consent – Conditions B52 and B1, 7 December 2018. 5. Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018.</td>
<td>HKA notified DPE and the Certifying Authority on 21 August 2018 that works onsite, comprising “initial set up and archaeological testing”, were intended to commence “on or after 23 August 2018”. Hindmarsh emailed Council on 20 August 2018 advising the expected commencement date. HKA advised that works commenced on site from 22 August 2018 comprising site preparation works, archaeological test pit investigations and other works fitting within the early works definition. The City of Sydney email dated 13 September 2018 indicates that the Council had received information relating to “Condition B1 - Notice of commencement of works. It is your responsibility to ensure that all relevant conditions are satisfied prior to works commencing.” Based on the correspondence, notification of commencement of construction was provided more than 48 hours prior to commencement of construction (11 September 2018).</td>
<td>Compliant</td>
</tr>
<tr>
<td>B2</td>
<td>Plans certified in accordance with section 6.28(2) of the EP&amp;A Act must be submitted to the Certifying Authority and the Planning Secretary prior to commencement of each stage of the construction works and must include</td>
<td>- New Ultimo Public School Structural Design Certificate, Taylor Thomson Whitting, Certificate 151959, 12 April 2018.</td>
<td>Based on the information provided, the Auditors consider this Condition to be generally compliant with respect to the provision of plans to the Certifying Authority and the DPE. The Auditors note that plans have been presented in stages to enable Crown Certificates to be issued for:</td>
<td>Compliant</td>
</tr>
</tbody>
</table>
### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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</table>
| B3          | Unless otherwise agreed to by the Planning Secretary, a Community Communication Strategy must be prepared to provide mechanisms to facilitate communication between the Applicant, the relevant 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 | • Community Communications Strategy, Ultimo Public School, Rev 0, Hindmarsh, 4 September 2018  
• Environmental Management & Sustainability Plan (EMP), Ultimo Public School, Rev 4, Hindmarsh, 15 August 2018  
• Community Engagement Plan, Ultimo Public School, | The Hindmarsh Community Communications Strategy was prepared and refers to Section 10 of the CEMP so the two documents have to be read in conjunction. It provides mechanisms for communication between stakeholders.  
The SINSW Community Engagement Plan and the SINSW Community Communication Strategy provide a more comprehensive description of the mechanisms intended to be used to facilitate | Compliant |

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<thead>
<tr>
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|    | details as required by any of the following conditions. | • Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning & Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Structural Works Below Ground Floor Slab Level, 16 October 2018.  
• Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning & Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Main Works, 8 January 2018.  
• Ultimo PS SSD 7503 Construction Compliance Matrix 2019.01.10 Rev 4.xlsx | 1. Structural Works Below Ground Floor Slab Level; and  
2. Main Works.  
The Structural Design Certificate was dated 12 April 2018 and referenced by the Certifying Authority on their Crown Certificate for Structural Works Below Ground Floor Slab Level dated 16 October 2018. HKA emailed the Crown Certificate for the Structural Works Below Ground Floor Slab Level to DPE on 1 November 2018 (reference Ultimo PS SSD 7503 Construction Compliance Matrix 2019.01.10 Rev 4.xlsx).  
Other Design Certificates referenced on the Crown Certificate for Main Works, dated between 26 April 2018 and 8 January 2019 were referenced by the Certifying Authority on their Crown Certificate for Main Works dated 8 January 2019. HKA emailed the Crown Certificate for Main Works to DPE on 10 January 2019 (reference Ultimo PS SSD 7503 Construction Compliance Matrix 2019.01.10 Rev 4.xlsx). | |
<table>
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<tbody>
<tr>
<td>B4</td>
<td>for a minimum of 12 months following the completion of construction.</td>
<td>School Infrastructure NSW (SINSW), November 2018. • Community Communication Strategy, Ultimo Public School – new school development, SINSW, January 2019.</td>
<td>communication between the Applicant and stakeholders.</td>
<td>Compliant</td>
</tr>
<tr>
<td></td>
<td>The Community Communication Strategy must:</td>
<td>Community Communications Strategy, Ultimo Public School, Rev 0, Hindmarsh, 4 September 2018 • Environmental Management &amp; Sustainability Plan (EMP), Ultimo Public School, Rev 4, Hindmarsh, 15 August 2018. • Email from Hindmarsh to HKA and BCA Logic, regarding Community Consultation Strategy / Complaints Procedure Conditions B3/4 and B40/41, 4 September 2018. • Community Communication Strategy, Ultimo Public School – new school development, SINSW, January 2019. • Interview with Project Manager and Construction Project Manager.</td>
<td>The Hindmarsh CCS did not meet all of the requirements of the condition; however, subsequent addition of the SINSW Community Engagement Plan, which HKA advised is supplementary to the Hindmarsh CCS, provides a comprehensive description of the stakeholders as well as the procedures and mechanisms for the engagement of the community as required by the Condition. HKA advised that a Project Reference Group (PRG) comprising representatives from the school community and the broader community has been meeting on a regular basis.</td>
<td>Compliant</td>
</tr>
</tbody>
</table>
## Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

<table>
<thead>
<tr>
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</tr>
</thead>
</table>
| B5 (as modified) | Prior to the commencement of construction, the Applicant must submit details of all design measures to the satisfaction Certifying Authority demonstrating the proposal incorporates ecologically sustainable development initiatives as outlined in the New Ultimo Pyrmont Public School - State Significant Development DA - ESD Services report (Appendix N, EIS) prepared by JHA Consulting Engineers dated 20 October 2017. | • Certificate of Design – ESD services, Subject Premises: Ultimo Primary School Redevelopment, JHA, 26 April 2018.  
• Email from Hindmarsh to HKA and BCA Logic, Attachments: 160204 Ultimo Pyrmont Public School - Ecologically Sustainable Development Statement RevA.pdf, 22 August 2018.  
• Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning & Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Structural Works Below Ground Floor Slab Level, 16 October 2018.  
• Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-1, 23 November 2018. | An ecological sustainable development (ESD) Certificate of Design was submitted to the Certifying Authority on 22 August 2018, prior to commencement of construction (11 September 2018).  
The Certifying Authority issued on 23 November 2018 evidence of their satisfaction with the Conditions requiring their approval that related to Stage 1 works, including Condition B5 and the ESD statement.  
As the design statement was submitted the Certifying Authority prior to commencement of construction, the Auditors consider this Condition to be compliant. | Compliant |
### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<tr>
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<tbody>
<tr>
<td>B6</td>
<td>Prior to commencement of building works, all outdoor lighting within the Subject Site must comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-1997 Control of the obtrusive effects of outdoor lighting. Details demonstrating compliance with these requirements must be submitted to the satisfaction of the Certifying Authority.</td>
<td>• Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-2, 4 December 2018. • Certificate of Design Electrical Services, Subject Premises: Ultimo Primary School Redevelopment, JHA, 13 August 2018. • Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning &amp; Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Main Works, 8 January 2018. • Hindmarsh email to BCA Logic, 13 August 2018, sighted by the Auditors on 26 February 2019.</td>
<td>The Crown Certificate issued by BCA Logic on 8 January 2018 indicates that a Design Statement for Electrical Services was prepared by JHA dated 29 August 2018. However, the JHA Certificate was dated 13 August 2018. Hindmarsh emailed it to the Certifying Authority on 13 August 2018. The Certifying Authority subsequently issued on 23 November 2018 evidence of their satisfaction with the Conditions requiring their approval that related to Stage 1 works, including Condition B6 and the Certificate of Design Electrical Services. The Crown Certificate for the Main Works also confirmed the Certifying Authority’s satisfaction with the electrical services. As the design statement was submitted the Certifying Authority prior to commencement of building works (16 October 2018), the Auditors consider this Condition to be compliant.</td>
<td>Compliant</td>
</tr>
<tr>
<td>B7</td>
<td>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 any work, the Certifying Authority must be satisfied that the works comply with these requirements.</td>
<td>• Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works –</td>
<td>Based on the information provided, the Auditors consider this Condition to be compliant with respect to access and evidence of such on the Crown Certificate for Main Works but non-compliant with</td>
<td>Non-compliant</td>
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### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<tr>
<td></td>
<td>Authority must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.</td>
<td>Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-1, 23 November 2018.</td>
<td>respect to timing of the provision of that evidence. No further action is recommended.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning &amp; Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Main Works, 8 January 2018.</td>
<td></td>
<td>The Certifying Authority, BCA Logic, issued an Access Assessment Report to accompany the Crown Certificate for the Main Works, both issued on 8 January 2019. The report states that &quot;it is considered [by BCA Logic] that [the design documentation] complies or is capable of complying with those documents subject to compliance with the matters detailed in Part 4 of this report&quot;. The matters detailed in Part 4 of the report are reflected in Attachment C – Conditions of Approval of the Crown Certificate.</td>
<td></td>
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<tr>
<td></td>
<td>B8 Soil erosion and sediment control measures must be designed in accordance with Managing Urban Stormwater – Soils &amp; Construction Volume 1 (2004) by Landcom. Details must be submitted to the satisfaction of the Certifying Authority prior to the commencement of any building works.</td>
<td>Email from Hindmarsh to BCA Logic with attached Erosion and Sediment Control Plan, Revision F, 31 August 2018.</td>
<td>The Erosion and Sediment Control Plan (ESCP) was sent to the Certifying Authority prior to commencement of building works (16 October 2018).</td>
<td>Compliant</td>
</tr>
<tr>
<td></td>
<td>• Email from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level,</td>
<td></td>
<td>The Certifying Authority subsequently issued evidence of their satisfaction with Condition B8 on 23 November 2018.</td>
<td></td>
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<td></td>
<td>As the ESCP was submitted the Certifying Authority prior to commencement of building works, the Auditors consider this Condition to be compliant.</td>
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### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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| B9          | Prior to the commencement of any work, the Applicant is to engage a suitably qualified person to prepare a Pre-Construction Dilapidation Report detailing the current structural condition of all retained existing and adjoining buildings within the site, infrastructure and roads within the ‘zone of influence’. Any entry into private land is subject to the consent of the owner(s) and any inspection of buildings on privately affected land must include details of the whole building where only part of the building falls within the ‘zone of influence’. The report must be submitted to the Certifying Authority, Council and Planning Secretary prior to the commencement of any building works. A copy of the report is to be forwarded to Council. In the event that access for undertaking a Pre-Construction Dilapidation Report is denied by an adjoining owner, the Applicant must demonstrate, in writing, to the Certifying Authority, Council and Planning Secretary that... | • Email from Hindmarsh to HKA and BCA Logic, 16 August 2018, with two Dilapidation Reports attached.  
• Hindmarsh email to City of Sydney, 20 August 2018, sighted by the Auditors on 26 February 2019.  
• Email from HKA to DPE dated 17 August 2018 with Dilapidation Reports, Parts 1 and 2, attached.  
• Property Condition Survey, Project: Ultimo Public School, Ultimo, Site Surveyed: Ultimo Public School, 177 Wattle Street, Ultimo NSW 2037, Inspection Date 10 August 2018, Job Reference: AD2482A, Australian Dilapidations. The dilapidation inspections were carried out by Australian Dilapidations on 10 August 2018, which was prior to commencement of any work. The two dilapidation reports were emailed to the Certifying Authority and DPE on the 16 and 17 August 2018, respectively, and Council on 20 August 2018, which was prior to commencement of building works (16 October 2018). The reports indicate that there was “Restricted visibility and access to west wall of the building”. However, no areas were noted in the reports that were “considered to be High Risk that were Not Inspected / Not Accessible or Inspection Impaired and where access should be gained”. The City of Sydney email dated 13 September 2018 indicates that the Council had received information relating to “B9 – Submission of Pre-Construction Dilapidation Reports”. | Compliant |
<table>
<thead>
<tr>
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</thead>
</table>
|              | all reasonable steps have been taken to obtain access and advise the affected property owner of the reason for the report and that these steps have failed. | • Property Condition Survey, Project: Ultimo Public School, Ultimo, Site Surveyed: Council Assets, Jones Street, Quarry Street, Wattle Street, Ultimo NSW 2037, Inspection Date 10 August 2018, Job Reference: AD2482B, Australian Dilapidations.  
• Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018. | | |
| B10          | Prior to the commencement of building works and to ensure that Aboriginal cultural heritage is appropriately managed across the Site and impacts are avoided, the Applicant must prepare an Aboriginal Archaeological Management Plan (AAMP) outlining how the construction works, including the removal of fill from the site, will be managed, to the satisfaction of the Certifying Authority. The AAMP must:  
a) be prepared to address all recommendations of the Heritage Impact Statement and Archaeological Assessment – Ultimo Pyrmont Public School report (Appendix J of the EIS dated October 2017) prepared by Urbis;  
b) describe the procedures for the investigation of areas of Aboriginal archaeological sensitivity | • Aconex Transmittal note from DesignInc to BCA Logic, 15 October 2018, with attached Aboriginal Cultural Heritage Management Plan (ACHMP), Draft v1 (18/05/2018) and Final v2 (12/10/2018)  
• Archaeological Management & Consulting Group and Streat Archaeological Services Pty Ltd, Aboriginal Cultural Heritage Management Plan, Lot 101 DP 1105527, Ultimo Public School, 189 Jones Street, Ultimo NSW (Sydney LGA), An Aboriginal Cultural Heritage Management Plan (ACHMP) was prepared by AMAC to meet the requirements of the AAMP. The Auditors consider that the ACHMP meets the requirements of Condition B10.  
The Auditors note that the ACHMP addresses Recommendation 4 of the Heritage Impact Statement to carry out test excavations is only addressed to the extent of stating that based on a “review of the proposed development impacts and geotechnical investigations [that] indicate that natural [intact soils] will not be impacted on during this project ... [AMAC considered that] the recommendations for test excavation do not appear necessary.” However, the Auditors understand that archaeological test excavations were subsequently conducted during early works onsite. | Compliant |
### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<tr>
<td></td>
<td>as identified and outlined in the Heritage Impact Statement and Archaeological Assessment – Ultimo Pyrmont Public School report (Appendix J of the EIS dated October 2017) prepared by Urbis; c) describe the procedures for management of artefacts retrieved, if required, including details of ongoing consultation with Registered Aboriginal Parties; d) describe the measures to manage and/or protect any relics/items identified during construction of the development; and e) provide the scope of a Subject Site induction program for all Subject Site employees, contractors and subcontractors outlining responsibilities under the National Parks and NSW Government Department of Planning and Environment 12 Wildlife Act 1974 and incorporate into any other relevant management plan or procedure as required.</td>
<td>Final (Version 2), 12 October 2018. • Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning &amp; Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Structural Works Below Ground Floor Slab Level, 16 October 2018. • Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-1, 23 November 2018. • Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-2, 4 December 2018.</td>
<td>The ACHMP was sent to the Certifying Authority on 15 October 2018, which was prior to commencement of building works (16 October 2018). The Certifying Authority subsequently issued evidence of their satisfaction with Condition B10 on 23 November 2018, post-commencement of building works (16 October 2018). However, the Auditors consider that the issue of the Crown Certificate for Stage 1 works on 16 October 2018 infers that the Certifying Authority was satisfied with the ACHMP on that date and effectively prior to commencement of any building works.</td>
<td></td>
</tr>
<tr>
<td>B11 (as modified)</td>
<td>The Applicant must engage a suitably qualified and experienced Aboriginal heritage expert to supervise excavation and civil works in Benjamin Street as the project’s Director Aboriginal Heritage Archaeologist, with 19 years of experience</td>
<td>• Email from DesignInnc to AMAC Group, 25 January 2018, Re: Ultimo Public</td>
<td>The approved AMAC Group fee proposal nominated Benjamin Street as the project’s Director Aboriginal Heritage Archaeologist, with 19 years of experience</td>
<td>Compliant</td>
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</table>
### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<thead>
<tr>
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<td></td>
<td>accordance with the Aboriginal Archaeological Management Plan to be prepared in accordance with Condition B13.</td>
<td>School - Aboriginal Cultural Heritage/Archaeology works – fee approval, attached 'AMAC Group Fee Proposal – Ultimo Pyrmont Public School. 1. AMAC Group Fee Proposal – Ultimo Pyrmont Public School, Historical Archaeological Research Design &amp; Methodology and Aboriginal Cultural Heritage Management Plan and test excavation, 17 November 2017.</td>
<td>working in Aboriginal archaeology including supervising excavations.</td>
<td></td>
</tr>
<tr>
<td>B12</td>
<td>An excavation director must be nominated to direct the archaeological program for the development. The excavation director must have appropriate qualification and experience commensurate with the scope of the development.</td>
<td>Email from DesignInc to AMAC Group, 25 January 2018, Re: Ultimo Public School - Aboriginal Cultural Heritage/Archaeology works – fee approval, attached 'AMAC Group Fee Proposal – Ultimo Pyrmont Public School. 1. AMAC Group Fee Proposal – Ultimo Pyrmont Public School, Historical Archaeological Research Design &amp; Methodology and Aboriginal Cultural Heritage Management Plan and test excavation, 17 November 2017.</td>
<td>The approved AMAC Group fee proposal, 17 November 2017, nominated Ivana Vetta as the Excavation Director / Senior Archaeologist for the project, with 3 years project experience as an excavation director. A later AMAC Group fee proposal, 6 June 2018, did not include Ivana Vetta and it is understood that Martin Carney, AMAC’s Principal Director, would be the Excavation Director. He has more than 140 archaeological sites in Australia based on the fee proposal. An email from Ivana Vetta, AMAC Group, to the Hindmarsh Project Manager, Mike Howell, dated 30 August 2018, confirmed that Martin Carney was to be the Excavation Director.</td>
<td>Compliant</td>
</tr>
<tr>
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</table>
| B13 (as modified) | All construction contractors, subcontractors and personnel involved in excavation and civil works are to be inducted and informed by the approved excavation director prior to commencing works at the Site, as to their obligations and requirements under the Aboriginal Archaeological Management Plan and Heritage Impact Statement and Archaeological Assessment in relation to historical archaeological sites and 'relics'. | • Hindmarsh 'Site Induction Powerpoint' slide presentation  
• Emails between AMAC Group and Hindmarsh Re: Ultimo Public School SSD/DA Conditions, dated between 29 to 30 August 2018. | The Hindmarsh Site Specific Induction presentation addresses Site Rules including Slide 21 relating to the Development Approval Conditions and including conditions relating to Aboriginal and European heritage awareness and a requirement for all parties to manage the works that they are responsible for, to meet these Conditions.  
Slide 39 covers "Environmental" requirements including "Aboriginal relics identified during excavations are to be reported immediately to Site Management and works are to cease until instructed further".  
AMAC Group approved the induction approach but noted slide 39 only referred to Aboriginal heritage and was missing the potential to encounter relics of | Compliant |

Plan and test excavation, 17 November 2017.  
• Email from Hindmarsh to BCA Logic, 24 August 2018, attached 'Excavation Director letter'.  
• Emails between AMAC Group and Hindmarsh Re: Ultimo Public School SSD/DA Conditions, dated between 29 to 30 August 2018. |  |  |  |
### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<td>B14</td>
<td>During excavation works archaeological monitoring must be undertaken in accordance with the Site in with the <em>Heritage Impact and Archaeological Assessment</em> dated October 2017 and prepared by Urbis.</td>
<td>Excavation at the site was not complete at the time of the Audit. A final excavation report will be submitted when excavation at the site is complete.</td>
<td>Not Triggered</td>
<td></td>
</tr>
<tr>
<td>B15</td>
<td>All affected historical archaeological relics and/or deposits of Local heritage significance are to be subject to professional archaeological excavation and/or recording before construction works commence which would impact those relics. A Research Design, including an Archaeological Excavation Methodology, must be prepared, in accordance with the Heritage Council’s guidelines, by the approved excavation director.</td>
<td>- AMAC Group letter to NSW Department of Education, Re. Ultimo Public School (SSD 7503) – Archaeological Work Method Statement (Research Design and Excavation Methodology), 19 March 2018.</td>
<td>Compliant</td>
<td></td>
</tr>
</tbody>
</table>

European origin. AMAC asked for the slide be amended to reflect:
- Aboriginal objects and items of aboriginal heritage are protected by the NPW Act 1974. If you find any suspected aboriginal artefacts, works should cease and we should be notified.
- Historical relics are protected by the Heritage Act 1977. Such discoveries may be wells, cess pits, drains, industrial infrastructure, artefacts, footings, foundations (brick, stone, cement, concrete) that are unrelated to the recently demolished buildings. For finds of this type, works should cease and we should be notified.

This change was not made. The Auditors recommend that, unless civil works are complete, the site induction presentation for personnel involved in excavation and civil works be updated to include the amendments recommended by AMAC.
## Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<tr>
<td>B16 (as modified)</td>
<td>After any archaeological works have been undertaken, a copy of the final excavation report(s) shall be prepared and lodged with the Heritage Council of NSW, Council and the Planning Secretary. The Applicant shall also be required to nominate a repository for any relics salvaged from any historical archaeological excavations.</td>
<td>Excavation at the site was not complete at the time of the Audit. A final excavation report will be submitted when excavation at the site is complete.</td>
<td>Not Triggered</td>
<td></td>
</tr>
<tr>
<td>B17</td>
<td>Prior to the commencement of construction, the Applicant must provide evidence to the Certifying Authority that the recommendations listed in Section 11 of the Heritage Impact Statement and Archaeological Assessment (Appendix J, EIS) prepared by Urbis have been complied with. This should include the results of the test excavations and evidence of consultation with the Office of Environment and Heritage, the Heritage Division and the Aboriginal Community.</td>
<td>• Aconex Transmittal note from DesignInc to BCA Logic, 15 October 2018, with attached Aboriginal Cultural Heritage Management Plan (ACHMP), Draft v1 (18/05/2018) and Final v2 (12/10/2018).&lt;br&gt;• Archaeological Management &amp; Consulting Group and Streat Archaeological Services Pty Ltd, Aboriginal Cultural Heritage Management Plan, Lot 101 DP 1105527, Ultimo Public School, 189 Jones Street, Ultimo NSW (Sydney LGA), Final (Version 2), 12 October 2018.&lt;br&gt;• Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning &amp; Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo.</td>
<td>Based on the information provided, the Auditors consider this Condition to be compliant with respect to implementing the requirements of Condition B17 but non-compliant with respect to timing of the provision of evidence to the Certifying Authority. No further action is recommended. The ACHMP prepared to meet the requirements on Condition B10 addresses the recommendations in Section 11 of the Heritage Impact Statement and Archaeological Assessment, including consultation with the Office of Environment and Heritage, the Heritage Division and the Aboriginal Community. The ACHMP indicates that it was prepared to manage unexpected finds. The Auditors understand that AMAC have been monitoring the archaeological test excavations and ongoing excavation work, effectively comprising a ‘watching brief’. On this basis, the Auditors consider this Condition to be compliant in relation to implementation. However, the ACHMP was not transmitted to the Certifying Authority until post commencement of construction (11 September 2018), which represents a non-compliance with SSD 7503 in relation to timing. No further action is recommended.</td>
<td>Non-Compliant</td>
</tr>
<tr>
<td>APPROVAL (ID)</td>
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| B18 | Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifying Authority structural drawings prepared and signed by a suitably qualified practicing Structural Engineer that demonstrates compliance with: a) the relevant clauses of the BCA; and b) the development consent. | Pyrmont Public School, Structural Works Below Ground Floor Slab Level, 16 October 2018.  
- Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-1, 23 November 2018.  
- Email from AMAC Group to DesignInc, RE: Ultimo PS - AMAC fees, 14 November 2018.  
- Letter from BCA Logic to DesignInc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning & Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Structural Works Below Ground Floor Slab Level, 16 October 2018. | Based on the information provided, the Auditors consider this Condition to be compliant with respect to the provision of structural drawings that demonstrate compliance with the BCA and SSD 7503 but non-compliant with respect to timing of the provision of the drawings to the Certifying Authority. No further action is recommended.  
The Structural Design Certificate dated 12 April 2018 and associated structural drawings were referenced on BCA Logic letters dated 16 October 2018 (Crown Certification for Structural Works Below Ground Floor Slab Level) and 23 November 2018 (Pre-commencement Conditions), which was post-commencement of construction (11 September 2018). | Non-compliant |
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| B19          | All mechanical ventilation systems must be installed in accordance with Part F4.5 of the BCA and must comply with the AS 1668.2-2012 *The use of air-conditioning in buildings* – Mechanical ventilation in buildings and AS/NZS 3666.1:2011 *Air handling and water systems of buildings–Microbial control* to ensure adequate levels of health and amenity to the occupants of the building and to ensure environment protection. Details must be submitted to the satisfaction of the Certifying Authority prior to the commencement of building works. | • Certificate of Design – Mechanical Services, Subject Premises: Ultimo Primary School Redevelopment, JHA, 26 April 2018.  
• Hindmarsh email to BCA Logic, 16 August 2018, sighted by the Auditors on 26 February 2019.  
• Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning & Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Main Works, 8 January 2018. | The JHA Certificate of Design – Mechanical Services states that design is in accordance with AS 1668.2-2012 but reference to AS/NZS 3666.1:2011 is missing.  
The Certifying Authority issued on 23 November 2018 evidence of their satisfaction with the Conditions requiring their approval that related to Stage 1 works, including Condition B19 and the JHA Mechanical Services Design Certificate, dated 15 August 2018. Similarly, the Crown Certificate issued by BCA Logic on 8 January 2018 refers to the JHA Design Statement for Mechanical Services, dated 15 August 2018. The Auditors observe that the date quoted by BCA Logic is different to the date on the JHA certificate.  
The Auditors cannot verify that the mechanical ventilation systems will comply with AS/NZS 3666.1:2011 *Air handling and water systems of buildings–Microbial control*.  
Based on the information provided, the Auditors consider this Condition to be compliant on the basis that the Certifying Authority has verified their | Compliant |

The Crown Certificate is evidence that the structural drawings were compliant with relevant clauses of the BCA. The Certifying Authority issued evidence of their satisfaction with the structural drawings and their compliance with SSD 7503 on 23 November 2018.
## Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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| B20      | Prior to the commencement of building works, final drainage design plans of the stormwater drainage management system must be prepared by a suitably qualified engineer generally in accordance with the stormwater drainage drawings prepared by *Taylor Thomson Whitting* (as listed under Condition A2). The drainage design plans must be submitted to the Certifying Authority prior to the commencement of building works. | • Design Statement – Hydraulic Services, Subject Premises: Ultimo Primary School Redevelopment, JHA, 26 April 2018.  
• Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning & Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Main Works, 8 January 2018. | The Certifying Authority issued evidence of their satisfaction with Condition B20 and the JHA “Hydraulic Services design certificate with reference to certified plans” dated 26 April 2018 on 23 November 2018. Similarly, the Crown Certificate issued by BCA Logic on 8 January 2018 refers to the same JHA Design Statement for Hydraulic Services. The Auditors have not been provided with evidence that the Hydraulic Services Design Statement was submitted to the Certifying Authority prior to the commencement of building works (16 October 2018); however, the Auditors have no reason to believe the condition was not complied with. | Compliant |
| B21      | The building plans and specifications accompanying the relevant plans submitted to the Certifying Authority prior to the commencement of building works associated with this consent must demonstrate that an appropriate area will be provided within the premises for the storage of garbage bins and recycling containers and all waste and recyclable material generated by the School. Requirements of these storage areas must be designed in consultation with Council, evidence of which must be supplied to the Certifying Authority, and must: a) ensure all internal walls of the storage area are rendered to a smooth surface, coved at the floor/wall intersection, graded, appropriately drained with a tap in proximity to facilitate | • Foresight Environmental, Waste – Construction and Operational Waste Management Plan, 24 October 2017.  
• Certificate issued by Foresight Environmental, dated 28 August 2018 (referenced in BCA Logic letter, 23 November 2018).  
• Hindmarsh email to BCA Logic, document reference Hindmars-GCOR-000099, 29 August 2018, sighted by the Auditors on 26 February 2019. | Foresight Environmental (FE) prepared a Construction and Operational Waste Management Plan in 2017 and then issued a Certificate in August 2018, as indicated in the BCA Logic dated 23 November 2018 and the Project's SSD 7503 Conditions matrix. Hindmarsh emailed the FE Certificate to BCA Logic on 29 August 2018. The email from Council dated 5 October 2018 indicates that Council was consulted in relation to waste storage. The BCA Logic letters dated 23 November 2018 indicate that the Council email was provided to them as evidence that consultation had occurred. The ‘Waste – Construction and Operational Waste Management Plan’ does not address all of the | Compliant |
Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<td>cleaning and drained to sewer via an approved treatment device;</td>
<td>• Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-1, 23 November 2018.</td>
<td>requirements of Condition B21 in relation to drainage to sewer with pre-treatment for the waste storage area or provision for organic/food waste collection. The Auditors have not reviewed all of the Construction drawings but Drawing No. AR-A-02200, which is listed on the Crown Certificate for the Main Works, indicates that the car park area where waste will be stored drains to sewer. On the basis that the FE Waste – Construction and Operational Waste Management Plan was reviewed by Council and the Certifying Authority and they evidenced their satisfaction with the management plan, and additionally the Certifying Authority also reviewed and approved the drawing plans and the FE Certificate, the Auditors consider this Condition to be compliant.</td>
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<td>b) include provision for the separation and storage, in appropriate categories, of material suitable for recycling; and</td>
<td>• Email from City of Sydney to Hindmarsh, Subject: SSD 7503 – Requirement for consultation with the City of Sydney in accordance with conditions of consent for Ultimo School Redevelopment, 5 October 2018.</td>
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<td>• Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning &amp; Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Main Works, 8 January 2018.</td>
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| B22         | Plans demonstrating compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the satisfaction of the Certifying Authority: a) the provision of a minimum 4 staff and 16 student bicycle parking spaces; b) the layout, design and security of bicycle facilities must comply with the minimum requirements of AS 2890.3:2015 Parking facilities - Bicycle parking, and be located in easy to access, well-lit areas that incorporate passive surveillance; c) the provision of end-of-trip facilities for staff in accordance with the ESD Design & As Built rating tool; d) appropriate pedestrian and cyclist advisory signs are to be provided; and e) all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority. | • ARUP, Ultimo Public School Redevelopment, Traffic Engineering Design Certification, Ref. 255340, 27 April 2018.  
• Drawing No. AR-06006, Rev A, 4 July 2018, not signed.  
• Hindmarsh letter to BCA Logic, Subject: SD 7503, 47-53 Jones St, Ultimo, Lot 101 in DP1105527, Conditions B22, B23 & B24, 24 August 2018, sighted by the Auditors on 26 February 2019.  
• Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-1, 23 November 2018.  
• Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning & Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo | The ARUP Traffic Engineering Design Certification was submitted to the Certifying Authority on 24 August 2018. It broadly states that “The vehicle access, loading area and car park have been designed in accordance with normal engineering practice and relevant Australian Standards”, including “AS 2890.3-2015 Bicycle parking”.  
The Auditors observe that the ARUP Ultimo Public School Redevelopment, Traffic Engineering Design Certification provided to Ramboll is dated 27 April 2018. Yet references to the certification in the BCA Logic letters dated 23 November 2018 and 8 January 2019, as well as the Project’s SSD 7503 Conditions matrix indicate that the certification was dated 21 August 2018.  
The Certifying Authority subsequently issued on 23 November 2018 evidence of their satisfaction with Condition B22. The Crown Certificate for the Main Works listed Drawing No. AR-06006, Rev A.  
The ARUP Traffic Engineering Design Certification itself does not reference specific plans but indicates that the bicycle parking had been designed in accordance with AS 2890.3:2015. Drawing No. AR-06006, details the construction details for the carpark bike cage and bike racks and provides for 4 staff and 16 student bike spaces as required. The Auditors have not verified compliance with Condition B22 b) in relation to access, lighting and surveillance or | Compliant
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| B23           | Prior to commencement of building works, plans demonstrating compliance with the following traffic and parking requirements must be submitted to the satisfaction of the Certifying Authority:  
   - a) all vehicles must enter and leave the site in a forward direction;  
   - b) a minimum of 3 on-site car parking spaces as shown in the plans listed in Condition A2 and constructed in accordance with the latest version of AS2890.1-1993;  
   - c) the largest vehicle entering the site should be wholly contained on site before being required to stop;  
   - d) appropriate pedestrian advisory signs are to be provided at the egress point of the car park;  
   - e) the safety measures detained in the Ultimo Pyrmont Public School Vehicle Access Road Safety Audit prepared by AMWC and dated 23 February 2018;  
   - f) all works/ regulatory signposting associated with the proposed development shall be at no cost to the relevant roads authority;  
   - g) the swept path of the longest vehicle entering and exiting the school site in association with the new work, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS. In this regard, a plan shall be submitted to RMS for approval, |  
|               |             | Pyrmont Public School, Main Works, 8 January 2018.  
   • Ultimo PS SSD 7503 Pre Construction Compliance Matrix 2019.01.10 Rev 3. | Condition B22 c), d) and e) and we rely on BCA Logic review. | Compliant |
|               |             | ARUP, Ultimo Public School Redevelopment, Traffic Engineering Design Certification, Ref. 255340, 27 April 2018.  
   • Hindmarsh letter to BCA Logic, Subject: SD 7503, 47-53 Jones St, Ultimo, Lot 101 in DP1105527, Conditions B22, B23 & B24, 24 August 2018, sighted by the Auditors on 26 February 2019.  
   • Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-1, 23 November 2018.  
   • Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning & Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo | The ARUP Traffic Engineering Design Certification was submitted to the Certifying Authority on 24 August 2018, pre-commencement of building works (16 October 2018). It broadly states that “The vehicle access, loading area and car park have been designed in accordance with normal engineering practice and relevant Australian Standards”, specifically including:  
   • “AS 2890.1-2004 Off-street car parking  
   • AS 2890.2-2002 Off-street commercial vehicle facilities  
   • AS 2890.3-2015 Bicycle parking  
   • AS 28090.6-2009 Off-street parking for people with disabilities”.  
   The Crown Certificates issued by the Certifying Authority do not reference the ARUP Traffic Engineering Design Certification and make no comment on traffic or car parking arrangement other than reference to architectural plans including car park plans. The Certifying Authority issued evidence of their satisfaction with the Traffic Engineering Design Certification and its compliance with SSD 7503 on 23 November 2018. The Auditors cannot verify that the plans meet the requirements of Condition B23 and we rely on BCA Logic review. |
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<td>which shows that the proposed development complies with this requirement; and h) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed. Plans indicating line marking and signage, of public roads and footways shall be submitted to the relevant roads authority for approval where required.</td>
<td>Pyrmont Public School, Structural Works Below Ground Floor Slab Level, 16 October 2018.</td>
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<td></td>
<td>• Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning &amp; Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Main Works, 8 January 2018.</td>
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<td>• Ultimo PS SSD 7503 Pre Construction Compliance Matrix 2019.01.10 Rev 3.</td>
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<tr>
<td>B24</td>
<td>The works that are the subject of this application must be designed and constructed in accordance with the Development Near Rail Corridors and Busy Roads – Interim Guidelines (2008). Details must be submitted to the satisfaction of the Certifying Authority prior to the commencement of building works.</td>
<td>Hindmarsh letter to BCA Logic, Subject: SD 7503, 47-53 Jones St, Ultimo, Lot 101 in DP1105527, Conditions B22, B23 &amp; B24, 24 August 2018, sighted by the Auditors on 26 February 2019.</td>
<td>The Certifying Authority letter dated 23 November 2018 indicates that they had received a letter from JHA regarding compliance with the Development Near [Rail] Corridors and Busy Roads – Interim Guidelines (2008), dated 24 August 2018 and they were satisfied that the JHA letter met the requirements of Condition B24. The Project’s SSD 7503 Conditions matrix also references the same JHA letter and reference (Hindmarsh-GCOR-000070). The Auditors have not sighted the JHA letter dated 24 August 2018 but assume that it was submitted to the Certifying Authority on 24 August 2018, pre-commencement of building works (16 October 2018), as indicated in the BCA Logic letter and Project’s SSD 7503 Conditions matrix and that therefore, the Condition is compliant.</td>
<td>Compliant</td>
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## Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<tr>
<td>B25</td>
<td>All roads and traffic facilities shall be designed to meet the requirements of Council or Roads and Maritime Services (RMS) (whichever is applicable). The necessary permits and approvals from the relevant road authority shall be obtained prior to the commencement of road or pavement construction works.</td>
<td>Various communications with Council and RMS sighted by the Auditors on 26 February 2019.</td>
<td>The Auditors understand that road and pavement construction works have not been carried out on the development at the time of this audit. Evidence of ongoing communications and consultation with RMS and the Transport Management Centre (TMC) was sighted by the Auditors.</td>
<td>Compliant</td>
</tr>
<tr>
<td>B26</td>
<td>a) Prior to the commencement of building works on the Subject Site, a <strong>Construction Environmental Management Plan (CEMP)</strong> must be prepared for the development and must address, but not be limited to, the following matters where relevant: i) hours of work; ii) 24-hour contact details of site manager; iii) traffic management, prepared in consultation with Council; iv) construction noise and vibration management, prepared by a suitably qualified person; v) management of dust and odour to protect the amenity of the neighbourhood; vi) erosion and sediment control; vii) stormwater control and discharge; viii) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the Subject Site;</td>
<td>Email from HKA to DPE Re: SSD 7503 Condition B26, 22 August 2018. Email from Hindmarsh to Council, 6 September 2018, sighted by the Auditors on 26 February 2019. Environmental Management &amp; Sustainability Plan (EMP), Ultimo Public School Rev 4, Hindmarsh, 15 August 2018. Environmental Management &amp; Sustainability Plan (EMP), Ultimo Public School Rev 7, Hindmarsh, 5 September 2018. Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as</td>
<td>A CEMP was prepared by Hindmarsh and is considered by the Auditors to be generally compliant with Condition B26 requirements. Hours of work are addressed but does not accurately reflect the permitted hours for noisier activities in accordance with Condition C2, nor does it accurately reflect the requirements for deviating from permitted hours of work in accordance with Condition C3 (e.g. approval in writing from DPE, notification of affected residents or that works is permitted if it is inaudible at the nearest sensitive receiver). No evidence has been provided of consultation during the preparation of the CEMP. Hindmarsh advised that Council were generally not receptive to consultation and only responded to a submitted document (e.g. a management plan) or a specific request (e.g. a request for a permit). Hence, consultation with Council in relation to the CEMP comprised submission of the CEMP.</td>
<td>Compliant</td>
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### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<th>APPROVAL ID</th>
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<td></td>
<td>ix) groundwater management plan including measures to prevent groundwater contamination;</td>
<td>of 13/09/18, 13 September 2018.</td>
<td>Section 16.10 states that “Storm water is to include rainwater, surface water, ground water, subsoil water and artesian water. Containment will be provided in accordance with the approved Erosion and Sediment Control Plan”. Hindmarsh advised that aside from seepage following heavy rainfall, groundwater is not intersected and there has been no need to dewater. ‘EIG001 – Soil Erosion, Sediment, Surface Water Run Off’ indicates that surface water quality would be tested “to ensure discharge offsite to waterways complies with contract and regulatory requirements”. Although it is not a requirement of Condition B26, the CEMP does not reflect the requirement of C21 that seepage or rainwater must not be pumped to the street stormwater system without prior approval in writing from the EPA.</td>
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<td>x) external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting;</td>
<td>Emergency Management Plan (EMMP), Ultimo Public School, Rev 5, Hindmarsh, 9 January 2018.</td>
<td>The CEMP does not address external lighting but it is addressed separately as part of the Design Statement for Electrical Services in accordance with Condition B6.</td>
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<td>xi) an unexpected finds protocol for contamination, Aboriginal and non-Aboriginal heritage and associated communications procedure;</td>
<td>Interview with Hindmarsh and HKA Project Managers, 26 February 2019.</td>
<td>Whilst the EIG013 – Land Contamination, attached to the CEMP in Appendix D includes a stop work control measure in the event that land contamination is suspected or encountered, it is considered that this alone would not comprise an unexpected finds protocol for contamination. The CEMP does not reflect the requirement B48 to gain the approval of the DPE and Certifying Authority prior to removal of “any material identified as contaminated”. It does not refer to the Emergency Management Plan that contains two protocols (4 – Environmental Emergencies, 17 – Unexpected Find of Asbestos or</td>
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<td>xii) 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; and</td>
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<td>xiii) waste storage, recycling and litter control.</td>
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b) The **CEMP** must not include works that have not been explicitly approved in the development consent. In the event of any inconsistency between the consent and the **CEMP**, the consent must prevail.

The Applicant must submit a copy of the **CEMP** to the Planning Secretary and Council, prior to commencement of work.
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|              | Known Health Hazard) that address unexpected finds of contamination to a degree. None of the available protocols refer to all of the agencies that may need to be notified including the DPE. Nor does the CEMP refer to the Asbestos Management Plan. However, in the case of asbestos contamination, it is expected potential contamination and therefore, not considered an “unexpected find”.

The CEMP addresses the discovery of artefacts in Section 16.3 but does not provide a protocol, such as the one provided in the Aboriginal Cultural Heritage Management Plan (ACHMP). It stipulates that work cease until continuation has been agreed with the Applicant and the Aboriginal community. It does not include the requirement to consult OEH as required under the ACHMP.

The CEMP addresses waste management in Section 16.12 including waste classification, recycling and waste storage. It indicates that waste will be “managed by mix use skip bins, with sorting off-site by a third party”. It does not reference the CWMP. It is not clear how waste will be managed in accordance with the EPA guidelines if it is carried out off-site. Nor is that compliant with Condition B34 b), which requires that details are to be submitted to the satisfaction of the Certifying Authority prior to removal of hazardous materials, or Condition B48, which requires that details of testing and the disposal location are to be submitted to the DPE prior to removal off-site. Section 16.12 does not address waste validation, nor is it addressed elsewhere in the CEMP. The EIG014 – Visual Amenity, attached to the... |
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<td>CEMP in Appendix D does include a control measure for the prevention of the uncontrolled movement of litter off-site and into waterways although detail on how that is achieved is not provided.</td>
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<td>HKA emailed the CEMP to DPE on 22 August 2018 and Hindmarsh emailed it to Council on 6 September 2018, which was prior to the commencement of building works (16 October 2018).</td>
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<td>The City of Sydney email dated 13 September 2018 indicates that the Council had received information relating to “B26 – Submission of a Construction Environmental Management Plan”.</td>
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<td>The Auditors make the following suggestions for improvement:</td>
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<td>• Ensure hours of operation accurately reflect SSD 7503 requirements.</td>
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<td>• Include reference to the consultation undertaken during preparation of the CEMP.</td>
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<td>• The CEMP should reflect all of the relevant construction requirements, not just those in Condition B26, including for example, B34 and B48 in relation to management of waste and unexpected finds of contaminated material.</td>
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<td>• Include appropriate unexpected finds protocols for contamination and artefacts.</td>
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<td>• Ensure incident reporting and notification requirements are clear and consistent with the relevant conditions of SSD 7503.</td>
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<td>• Ensure that if a requirement is addressed in more than one plan, that the plans cross-reference each other in relation to the specific Condition.</td>
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### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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</thead>
</table>
| B27         | The CEMP (as revised from time to time) must be implemented by the Applicant for the duration of the construction works. | • Construction Noise and Vibration Management Plan, Ultimo Pyrmont Public School, Rev B, JHA Consulting Engineers, 4 September 2018.  
• Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018.  
• Interview with Hindmarsh and HKA Project Managers, 26 February 2019. | The CEMP has been revised a number of times. | Compliant |
| B28         | Prior to the commencement of building works on the Subject Site, a Construction Noise and Vibration Management Plan (CNVMP) must be prepared for the development and must address, but not be limited to, the following matters where relevant: a) be prepared by a suitably qualified expert; b) be prepared in consultation with Council and all noise sensitive receivers where noise levels exceed the construction noise management level, in accordance with EPA guidelines; c) describe the measures that would be implemented to ensure: i) best management practice is being employed; ii) compliance with the relevant conditions of this consent; d) describe the proposed noise and vibration management measures in detail; e) include strategies that have been developed to address impacts to noise sensitive receivers where noise levels exceed the construction noise management level, for managing high noise generating works; f) describe the consultation undertaken to develop the strategies in e) above; g) evaluates and reports on the effectiveness of the noise and vibration management measures;  | The CNVMP was prepared by JHA Consulting Engineers (JHA) who also prepared the noise and vibration impact assessment for the Development Application. It was issued to Hindmarsh on 4 September 2018, which was prior to commencement of building works.  
The CNVMP provides a detailed discussion of noise and vibration controls that may be utilised, including elimination, substitution, engineering and administrative controls, which are considered to reflect best management practice and are aimed to achieve compliance with the relevant conditions of SSD 7503. It addresses measures in the event that noise or vibration levels are exceeded.  
The CNVMP includes a section on complaints in which JHA recommend various procedures to be followed. However, the CEMP and CCS do not cross-reference the CNVMP.  
The Auditors make the following suggestion for improvement: • Cross reference the CEMP and CCS with the CNVMP to ensure consistency and that complaints are followed up appropriately as recommended in the CNVMP. | Compliant |
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<td>h)</td>
<td>h) include a complaints management system that would be implemented for the duration of the project.</td>
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</table>
| B29 | The Applicant must submit a copy of the CNVMP to the Planning Secretary and Council, prior to commencement of work. | • HKA email to DPE, 5 September 2018 with the CNVMP attached.  
• Email from Hindmarsh to Council, 5 September 2018, sighted by the Auditors on 26 February 2019.  
• Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018. | HKA emailed the CNVMP to DPE on 5 September 2018 and Hindmarsh emailed it to Council on 5 September 2018, prior to the commencement of building works, being the timeframe referred to in Condition B28.  
The City of Sydney email dated 13 September 2018 indicates that the Council had received information relating to “B29 – Submission of a Construction Noise and Vibration Management Plan”. | Compliant |
| B30 | The CNVMP (as revised from time to time) must be implemented by the Applicant for the duration of the construction works. | The CNVMP has not been revised to the Auditors’ knowledge. | | Noted |
| B31 | The Applicant must prepare a Construction Soil and Water Management Plan (CSWMP) and the plan must:  
a) be prepared by a suitably qualified expert, in consultation with Council;  
b) be submitted to the approval of the Certifying Authority prior to the commencement of construction;  
c) describe all erosion and sediment controls to be implemented during construction;  
d) 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);  
e) detail all off-Site flows from the Site; and | • Environmental Management & Sustainability Plan (EMP), Ultimo Public School Rev 4, Hindmarsh, 15 August 2018.  
• Email from HKA to DPE Re: SSD 7503 Condition B26, 22 August 2018.  
• Email from City of Sydney to Hindmarsh, Subject: SSD | Based on the information provided, the Auditors consider this Condition to be generally compliant.  
The CSWMP comprises an Erosion and Sediment Control Plan (ESCP), prepared by Taylor Thomson Witting, reference no. C001, revision E. This was included in the CEMP as Appendix C and was reviewed in higher resolution during the site visit.  
The BCA Logic letters dated 23 November and 4 December 2018, indicate that an Erosion and Sediment Control Plan, reference C001, revision F, 19 July 2018, and a Design Certificate dated 16 October 2018 (not sighted by the Auditors), were | Compliant |
Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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|             | f) 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. | 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018.  
- Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-1, 23 November 2018.  
- Letter from BCA Logic to HKA Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School Stage 1 works – Structural Works below Ground Floor Slab Level, Ref: 106876-ltr-2, 4 December 2018  
- Interview with Hindmarsh and HKA Project Managers, 26 February 2019. | submitted to the Certifying Authority (BCA Logic), and that the Certifier was satisfied that the information submitted met the requirements of Condition B31.  
It was not clear to the Auditors how the ESCP addresses measures for small and large sized rain events, including 1 in 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI. The Auditors recommend that the ESCP (and/or CEMP) be reviewed to clarify measures for small and large sized rain events. |  |
| B32         | The Applicant must submit a copy of the CSWMP to Council, prior to commencement of work. | Email from Hindmarsh to Council, 6 September 2018, sighted by the Auditors on 26 February 2019.  
- Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School | Hindmarsh emailed the CEMP containing the ESCP as an Appendix, to Council on 6 September 2018, which was prior to the commencement of construction works (11 September 2018) [timing consistent with B31].  
The City of Sydney email dated 13 September 2018 indicates that the Council had received information relating to "B31 – Submission of a Construction Soil | Compliant |

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Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<tr>
<td>B33</td>
<td>The CSWMP (as revised from time to time) must be implemented by the Applicant for the duration of the construction works.</td>
<td>Redevelopment – update as of 13/09/18, 13 September 2018. and Water Management Plan”. The Auditors interpret this as indicating that Council had received the CSWMP.</td>
<td>The ESCP has not been revised to the Auditors’ knowledge.</td>
<td>Noted</td>
</tr>
<tr>
<td>B34</td>
<td>a) Prior to the commencement of works on the Site, a Construction Waste Management Plan (CWMP), prepared by a suitably qualified person in consultation with the Council. A copy of the CWMP must be provided to the Planning Secretary. The CWMP must address, but not be limited to, the following matters: i) recycling of demolition materials including concrete; and ii) removal of hazardous materials 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. b) Details demonstrating compliance with the relevant legislative requirements, associated with the removal of hazardous waste, particularly the method of containment and control of emission of fibres to the air, are to be submitted to the satisfaction of the Certifying Authority prior to the removal of any hazardous materials. c) The Applicant must submit a copy of the plan to the Planning Secretary and to the Council prior to the commencement of work. d) The Applicant must notify Transport Management Centre (TMC) of the truck route(s).</td>
<td>Hindmarsh, Ultimo Public School Waste Management Plan, Rev A, 30/08/2018. Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018. Email from City of Sydney to Hindmarsh, Subject: SSD 7503 – Requirement for consultation with the City of Sydney in accordance with conditions of consent for Ultimo School Redevelopment, 5 October 2018. Waste Management Plan, Hindmarsh, Ultimo Public School, Just Skip Bins, not dated. Interview with Hindmarsh and HKA Project Managers, 26 February 2019. Hindmarsh ‘Site Instruction’ to ACE Demolition and</td>
<td>The Auditors consider this condition to be generally compliant. The CWMP is a plan for construction of the development and was prepared prior to the start of construction. Asbestos impacted soil was removed from site in November 2018. The presence of asbestos was not considered to be an unexpected find as it was addressed in the Remediation Action Plan (RAP). The Auditors observe that this work appears to have been planned and undertaken in accordance with legislative requirements. The Auditors reviewed the RAP, the Asbestos Management Plan and an Interim Advice letter issues by the Site Auditor. The Auditors sighted evidence of consultation with SafeWork NSW and the EPA and records of waste classification and waste transport to a licensed facility. The Auditors could not verify that relevant information had been provided to Certifying Authority prior to the removal of hazardous materials, in accordance with this Condition. The Auditors consider that appropriate measures were in place and that the omission to notify the Certifying Authority did not cause environmental harm. The Auditors make no recommendation for further action in this regard.</td>
<td>Compliant</td>
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<td>APPROVAL (ID)</td>
<td>REQUIREMENT</td>
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| B35 | The Applicant must submit a copy of the **CWMP** to the Planning Secretary and to the Council, prior to commencement of work. | • Email from HKA to DPE, Re: SSD 7503 Conditions B35, B35 and B36, 7 September 2018.  
• Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018.  
• Email from City of Sydney to Hindmarsh, Subject: SSD 7503 – Requirement for consultation with the City of Sydney in accordance with conditions of consent for Ultimo School Redevelopment, 5 October 2018. | The Auditors consider this condition to be generally compliant. The CWMP is a plan for construction of the development and was submitted prior to the start of construction.  
HKA emailed the CWMP to DPE on 7 September 2018.  
A City of Sydney email dated 5 October 2018 indicated that the CWMP and a Construction and Operational Waste Management Plan were submitted to Council via email on 6 and 7 September 2018. The Council representative states in the email that "the above mentioned documentation has been reviewed and is endorsed for the purposes of the above referenced conditions only". | Compliant |
| B36 | The CWMP (as revised from time to time) must be implemented by the Applicant for the duration of the construction works. | | The CWMP has not been revised to the Auditors’ knowledge. | Noted |
| B37 | a) Prior to the commencement of works on the Subject Site, a Construction Traffic and Pedestrian Management Plan (CTPMP) must be prepared for the development by a suitably qualified expert in consultation with Council, RMS and the CBD Coordination office within TfNSW and submitted for the approval of the Certifying Authority. The CTPMP must specify, but not be limited to, the following: i) identification of construction traffic routes for all required vehicles during construction,  
• Temporary Traffic Management Plan, Ultimo Public School, Rev 2, Hindmarsh, 28 August 2018  
• Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied | | The Auditors understand that Council had accepted the CTPMP and the Certifying Authority was satisfied by the CTPMP. Notwithstanding, the Auditors consider this Condition to be non-compliant as not all of the requirements of Condition B37 have been addressed.  
The CTPMP, Rev 1, was first issued on 13 August 2018, which was prior to commencement of works (22 August 2018), and then submitted to the Certifying Authority on 16 August 2018, also pre-commencement of works. | Non-compliant |
Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<td>inclusive of any crane delivery, including any known road closures and consideration of alternate routes and construction traffic volumes (including heavy vehicle/spoil haulage) on these routes; ii) details of construction vehicle movements including parking, dedicated vehicle turning areas, and ingress and egress points; iii) construction hours and program; iv) discussion of construction impacts that could result in disruption of traffic, public transport, pedestrian and cycle access, access to public land, property access, including details of oversize load movements, and the nature and duration of those impacts; v) discussion of potential cumulative construction impacts on the surrounding road network as a result of the simultaneous construction of adjoining developments, including reference to existing CTPMPs; vi) details of management measures to minimise traffic impacts, including temporary road work traffic control measures and measures to minimise peak period congestion; vii) details of measures to maintain or provide alternative safe and accessible routes for pedestrians throughout the duration of construction; viii) details of measures to maintain connectivity for cyclists, with particular emphasis on providing adequate access between key existing cycle routes for commuter cyclists; requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018.</td>
<td>The Auditors sighted email correspondence between Hindmarsh and the Council during early to late August regarding work zone applications and other matters.</td>
<td>The City of Sydney email dated 13 September 2018 indicates that the Council had received information relating to “B37 – Consultation on Construction Traffic and Pedestrian Management Plan – under review already by Traffic Operational Team at City. Continue to liaise with them directly on this. Send me final copy to satisfy Condition B38 when it is agreed.” This indicates that the Council was consulted in relation to the CTPMP and related matters.</td>
<td>The BCA letters dated 23 November and 4 December 2018 indicate that an email from Council to Hindmarsh dated 18 October 2018 confirmed acceptance of the CTPMP. The letters also indicate that the Certifying Authority was satisfied that the CTPMP, revision 5, met the requirements of Condition B37. However, the Auditors consider that the CTPMP content is non-compliant as it does not adequately address all of the requirements of Condition B37. It is recommended that it be updated to: • distinguish vehicle types for the traffic routes map; • indicate partial road closure lanes, alternate routes • include discussion of construction impacts, their nature and duration, on traffic, public transport,</td>
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### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<td>ix) details of methods to be used to communicate proposed future traffic changes to affected road users, pedestrians and cyclists; x) an adaptive response plan which sets out a process for response to any traffic, construction or other incident; and xi) mechanisms for the monitoring, review and amendment of the <strong>CTPMP</strong>.</td>
<td>regarding Proposed crane erection • Crane Licence – Partial Road/Lane Closure, issued by City of Sydney, 8 November 2018. • Road Occupancy Licence, Licence, Transport Management Centre, 5-12 December 2018 • Hindmarsh email to BCA Logic, Document reference ‘Hindmars-ADVICE-000005’, 16 August 2018, sighted by the Auditors on 26 February 2019.</td>
<td>pedestrians, cyclists, property access, particularly for example, oversize load movements; • include discussion of cumulative construction impacts on the surrounding road network, if there are other construction projects in the vicinity of the site; • include details of measures for how connectivity for cyclists / cycle routes are maintained; and • include an adaptive response plan to traffic, construction or other incident.</td>
<td>Non-compliant</td>
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<tr>
<td>B38</td>
<td>The Applicant must submit a copy of the <strong>CTPMP</strong> to the Planning Secretary and Council, prior to commencement of work.</td>
<td>• Email from HKA to DPE Re: Ultimo PS – SSD conditions B37 and B38, 28 August 2018, with the Attachment as follows: 1 Temporary Traffic Management Plan, Ultimo Public School, Rev 2, Hindmarsh, 28 August 2018. • City of Sydney email to Hindmarsh, 3 September 2018, sighted by the Auditors on 26 February 2019.</td>
<td>HKA emailed the CTPMP, Rev 2, to DPE on 28 August 2018, which was post commencement of works (22 August 2018). No further action is recommended.</td>
<td>Non-compliant</td>
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<tr>
<td>B39</td>
<td>The <strong>CTPMP</strong> (as revised from time to time) must be implemented by the Applicant for the duration of the construction works.</td>
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<td>Compliant</td>
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### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<tr>
<th>APPROVAL (ID)</th>
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</table>
| B40           | Prior to the commencement of construction works, or as otherwise agreed by the Planning Secretary, the following must be made available for community enquiries and complaints for the duration of construction:  
  a) a toll-free 24-hour telephone number(s) on which complaints and enquiries about the carrying out of any works may be registered;  
  b) a postal address to which written complaints and enquiries may be sent; and  
  c) an email address to which electronic complaints and enquiries may be transmitted. | • Community Communications Strategy, Ultimo Public School, Rev 0, Hindmarsh, 4 September 2018  
• Environmental Management & Sustainability Plan (EMP), Ultimo Public School, Rev 4, Hindmarsh, 15 August 2018.  
• Environmental Management & Sustainability Plan (EMP), Ultimo Public School, Rev 7, Hindmarsh, 5 September 2018.  
• Signs at the site gates.  
• NSW Government poster near the gates. | The CCS, CEMP and signage at the site entrances generally meet the requirements of this Condition. | Compliant |
| B41           | A **Complaints Management System** must be prepared prior to the commencement of any construction works and be implemented and maintained for the duration of these works.  
  The **Complaints Management System** must include a **Complaints Register** to be maintained recording information on all complaints received about the development during the carrying out of any works associated with the development. The **Complaints Register** must record the:  
  a) number of complaints received;  
  b) number of people affected in relation to a complaint; and  
  c) nature of the complaint and means by which the complaint was addressed and whether | • Community Communications Strategy, Ultimo Public School, Rev 0, Hindmarsh, 4 September 2018  
• Environmental Management & Sustainability Plan (EMP), Ultimo Public School, Rev 4, Hindmarsh, 15 August 2018.  
• Environmental Management & Sustainability Plan (EMP), Ultimo Public School, Rev 7, Hindmarsh, 5 September 2018. | Neither the CCS nor the CEMP refer to a Complaints Management System. However, the Auditors consider that the Complaint Register referred to in the CCS forms the basis of a Complaints Management System and is broadly compliant with Condition B41 requirements.  
The Auditors make the following suggestions for improvement:  
• That the CCS and CEMP be updated to include reference to a Complaint Management System that describes the Complaint Register and the information it contains, specifically including the information required under this Condition B41.  
• A field be added to the Complaints Register for the nature of the complaint e.g. Noise, Vibration, Air, Water, Traffic. | Compliant |
### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<tr>
<th>Approval (ID)</th>
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<th>Evidence Collected</th>
<th>Independent Audit Findings and Recommendations</th>
<th>Compliance Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>B42</td>
<td>Remediation approved as part of this development consent must be carried out in accordance with the Environmental Site Assessment and Remediation Action Plan prepared by Environmental Investigation Services, dated 31 May 2018.</td>
<td>Remediation is being undertaken under the supervision of Environmental Investigation Services (EIS), who prepared the RAP and Asbestos Management Plan, and is audited by an EPA Accredited Auditor from Senversa. Therefore, the Auditors (Ramboll) have not audited this Condition.</td>
<td>Noted</td>
<td></td>
</tr>
</tbody>
</table>
| B43           | The Applicant must carry out the remediation works using suitably qualified and experienced contractor(s). | • Interview with Project Manager and Construction Project Manager.  
• Letter from Senversa to DesignInc, Re: Interim Audit Advice No. 2 – Review of Asbestos Management Plan for New Ultimo Pyrmont Public School, 20 December 2018. | Remediation is being undertaken under the supervision of EIS, who prepared the RAP and Asbestos Management Plan, and is audited by an EPA Accredited Auditor from Senversa. | Compliant |
| B44           | The Applicant must remediate the Subject Site to meet the remediation goals as agreed to in writing by an EPA accredited Site Auditor. | • Letter from Senversa to DesignInc, Re: Interim Audit Advice No. 2 – Review of Asbestos Management Plan for New Ultimo Pyrmont Public School, 20 December 2018.  
• Ultimo PS SSD 7503 Pre Construction Compliance Matrix 2019.01.10 Rev 3. | The Project’s SSD 7503 Conditions matrix indicates that the Site Auditor issued an Interim Audit Advice – Review of Remediation Action Plan for New Ultimo Public School, on 27 August 2018. The Auditors have not been provided with Interim Audit Advice (IAA) No. 1 but a second IAA was issued by the Site Auditor on 20 December 2018, which confirmed that the first IAA dated 27 August 2018 provided “an initial independent review to confirm the suitability and appropriateness of the Remediation Action Plan (RAP)”. | Compliant |
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| B45          | Prior to the commencement of site preparation works, the Applicant must demonstrate to the satisfaction of the Planning Secretary, that an EPA accredited Site Auditor has approved the amended RAP. | • Email from HKA to DPE, Re: Ultimo PS – SSD conditions B42, B43, B44, B45, Attachments S16717-RPT_Rev1_1AA.pdf, 28 August 2018.  
• Ultimo PS SSD 7503 Pre-Construction Compliance Report Rev 3 (including SSD 7503 Consent Matrix) (Date 10/01/2019) | HKA emailed S16717-RPT_Rev1_1AA to the DPE on 28 August 2018 and the Auditors assume that the attached document was the IAA No.1 that the Site Auditor issued on 27 August 2018 reviewing the RAP. The Auditors have not been provided with IAA No. 1 and cannot therefore, verify that the Site Auditor has approved the RAP but based on the Site Auditor's IAA No. 2, the Auditors see no reason to believe that the Site Auditor did not approve the RAP.  
HKA emailed IAA No.1 to the DPE on 28 August 2018, which was pre-commencement of construction work (11 September 2018), which is taken by the Auditors to be when site preparation works commenced.  
Hence, the Auditors consider this Condition to be compliant. | Compliant |
| B46          | Following the remediation of the Subject Site, the Applicant must submit a Validation Report for the development. The Validation Report must:  
a) be reviewed by an EPA accredited Site Auditor;  
b) be submitted to the Planning Secretary for review at least one month prior to the commencement of operation;  
c) be prepared in accordance with Environmental Site Assessment and Remediation Action Plan prepared by Environmental Investigation Services, dated 31 May 2018 and the Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites (OEH, 2011); | | The Auditors understand that the remediation and validation works are presently ongoing and that the Validation Report will be produced prior to occupation of the site. | Not triggered |
### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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<tr>
<td>B47</td>
<td>The Applicant must submit, to the satisfaction of the EPA and Planning Secretary, a Site Audit Report and Site Audit Statement prepared by an EPA accredited site auditor, prior to occupation of the Subject Site. The Site Audit Report and Site Audit Statement must verify that the land is suitable for the uses proposed as part of this consent.</td>
<td>The Auditors understand that the remediation and validation works are presently ongoing and that the Site Audit Report and Site Audit Statement will be produced prior to occupation of the site.</td>
<td>Not triggered</td>
<td></td>
</tr>
<tr>
<td>B48</td>
<td>Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination finds procedure to ensure that any unexpected potentially contaminated material is appropriately managed. The procedure must form part of the CEMP in accordance with Condition B27 [this should read B26] and must ensure any material identified as • Environmental Management &amp; Sustainability Plan (EMP), ultimo Public School Rev 4, Hindmarsh, 15 August 2018. • Hindmarsh Site Instruction email (Reference number: Hindmars-GCOR-000307),</td>
<td>The Auditors consider this Condition to be generally compliant with respect to the preparation of an unexpected contamination finds procedure and its inclusion in the CEMP. However, the Auditors observe that there are a number of management plans including the CEMP, the Emergency Management Plan (EMMP), as well as the RAP that contain unexpected finds procedures to varying levels of detail. None of</td>
<td>Compliant</td>
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|              | contaminated is appropriately managed and disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site. | Re: Asbestos Removal, 24 October 2018.  
• Letter from Serversa to DesignInc, Re: Interim Audit Advice No. 2 – Review of Asbestos Management Plan for New Ultimo Pyrmont Public School, 20 December 2018. | the procedures refer to requirement to submit the disposal location and results of testing to the DPE prior to removal of the material from the site.  
The Auditors make the following suggestion for improvement:  
• Prepare a single unexpected finds protocol for contaminated material, including asbestos, that meets all of the requirements including Condition B48 and the provision of information to the DPE. The same protocol should be attached to all of the relevant management plans including the CEMP, CWMP, EMMP, AMP and RAP, as considered appropriate, in order to ensure a consistent approach to compliance. | Compliant |

B49 Prior to the commencement of work the Applicant is to negotiate with the utility authorities (e.g. Ausgrid and telecommunication carriers) in connection with the relocation and/or adjustment of the services affected by the construction of the building structure. |  
• Email from Hindmarsh to DPE, cc BCA Logic and HKA, dated 22 August 2018 with two Ausgrid documents attached:  
1. Ausgrid email, 17 May 2017, addressed to JHA Engineers  
2. Ausgrid Design Information, Site Specific Requirements – Complex, 17 May 2017  
• Letter from BCA Logic to HKA, 4 December 2018 Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School, Stage 1 works –  
Hindmarsh emailed correspondence with Ausgrid to DPE, HKA and BCA Logic. It relates to the Electricity Network Application for Ultimo Public School and was sent on 22 August 2018, which was the day that work commenced.  
A letter from the Certifying Authority, BCA Logic, contains an email from DesignInc dated 27 November 2018 that indicates that JHA had liaised with Jemena regarding gas service (5/11/17) and Sydney Water (27/06/17).  
The Project’s SSD 7503 Conditions matrix indicates that written advise relating to:  
• telecommunications will not be available until August / September 2019 as there were no changes to the existing connection point; | Compliant |
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|              | Structural Works below Ground Floor Slab Level  
• Ultimo PS SSD 7503 Pre Construction Compliance Matrix 2019.01.10 Rev 3.  
• Interview with Hindmarsh and HKA Project Managers, 26 February 2019. | • gas supply, being a new application through Jemena, would not be available until September 2019; and  
• Sydney Water services, including water and sewer, would be required before practical completion in October 2019.  
Hindmarsh advised the Auditors that aside from Ausgrid, no other services needed to be relocated or adjusted. On the basis of the available information, the Auditors consider this Condition to be compliant. | | |
| B50          | 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.  
• Email from Hindmarsh to DPE, cc BCA Logic and HKA, dated 22 August 2018 with two Ausgrid documents attached:  
  1. Ausgrid email, 17 May 2017, addressed to JHA Engineers  
• Letter from BCA Logic to Designinc Sydney Re: Crown Certification, Section 6.28(2), Environmental Planning & Assessment Act, 1979 – BCA Compliance Certificate, New Ultimo Pyrmont Public School, Main Works, 8 January 2018. | Written advice was obtained from Ausgrid (electricity supply) prior to commencement of above ground works.  
Jemena (gas) was consulted during preparation of the Services, Infrastructure and Water Management Plan and an Offer Letter for a new connection dated 5 November 2017, was provided.  
JHA Engineering submitted an application for Telstra service on 13 November 2018, which was prior to commencement of aboveground works, as evidenced by the issue of the second Crown Certificate for Main Works (8 January 2019). | Compliant | |
### Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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|               | The external walls of all buildings, including additions to existing buildings, must comply with the relevant requirements of the NCC. Prior to commencement of works, the Applicant must provide the Certifying Authority with documented evidence that the products and systems proposed for use external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the NCC. The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it. | • Ultimo PS SSD 7503 Pre Construction Compliance Matrix 2019.01.10 Rev 3.  
• Offer Letter from Jemena to JHA Engineers, 11 July 2017  
• Email from JHA Consulting Engineers to DesignInc, Hindmarsh and HKA, Attachment: Telstra Smart Community - AFR Preview | Based on the information provided, the Auditors consider this Condition to be compliant with respect to compliance with the relevant requirements of the NCC but non-compliant with respect to timing of the provision of the information to the Certifying Authority. No further action is recommended.  

   The Project’s SSD 7503 Conditions matrix indicates that an email was sent to the DPE on 6 December 2018 "stating Condition B51 status covering Condition B51” and that “evidence of full compliance with NCC for the project was accepted by the Certifier”.  

   Based on the available information, the documented evidence was not provided to the Certifying Authority prior to commencement of works (22 August 2018) and therefore, this Condition is considered non-compliant based on a late submission. | Non-compliant |
# Table A-2: Compliance with Development Consent SSD 7503 Part B Conditions

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| B52           | A Pre-Construction Compliance Report must be prepared for the development and submitted to the Certifying Authority for approval before the commencement of construction works. A copy of the endorsed compliance report must be provided to the Planning Secretary at compliance@planning.nsw.gov.au before the commencement of construction works. | • Email from HKA to DPE and BCA Logic, 27 November 2018, Re: SSD 7503 – Condition 52, Attachment: Condt B53 106876-ltr-1 Pre-commencement Conditions 23.11.18 (3).pdf (refer below).  
• Letter from BCA Logic to HKA, 23 November 2018 Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School, Stage 1 works – Structural Works below Ground Floor Slab Level  
• Email from DPE to HKA, Subject: Ultimo Public School SSD 7503 – condition B52 & Condition B1, 3 December 2018.  
• Email from HKA to DPE, 6 December 2018, Re: Ultimo Public School SSD 7503 – Condition B52 & Condition B1, Attachments as follows:  
  1. Letter from HKA to DPE Re. Ultimo Public School SSD 7503 Consent – | The Auditors consider this condition to be non-compliant as the initial report submitted did not meet the requirements of the DPE and it was submitted to the Certifying Authority after the commencement of construction works. The Auditors do not recommend further action as the report was subsequently revised and resubmitted to DPE.  
HKA emailed to DPE on 27 November 2018 a letter from the Certifying Authority, BCA Logic, in which they indicate that all of the conditions that required the approval of or verification by the Certifier, as listed in a table, were satisfied in that respect. However, the DPE responded via email on 3 December 2018 to advise that the ”The [BCA Logic letter] does not reflect a pre-construction compliance report which has been endorsed by the Certifying Authority”.  
HKA subsequently prepared a Pre-Construction Compliance Report, which HKA refer to as a Pre-Commencement Compliance Report, and submitted it to DPE via email on 6 December 2018 along with a letter responding to the DPE email and a revised letter from the Certifying Authority, BCA Logic, dated 4 December 2018. However, the BCA Logic letter was not substantially different and did not endorse the Pre-Commencement Compliance Report, Rev 2. | Non-compliant |
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<td>Conditions B52 and B1, 7 December 2018</td>
<td>The Applicant reportedly received comments from DPE on the Pre-Construction Compliance Report, Rev 2 at a meeting on 17 December 2018. The Applicant subsequently re-issued the Pre-Construction Compliance Report, Rev 3 on 11 January 2018 to address the DPE’s comments. A letter from the Certifying Authority endorsing the Pre-Construction Compliance Report, Rev 3, was also issued to DPE with the report.</td>
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<td></td>
<td>2. SSD 7503 Condition B52 Pre-Commencement Compliance Report, Rev 2, 6 December 2018.</td>
<td>The Auditors observe that although the Applicant has not specifically acknowledged a non-compliance with this Condition, the Applicant did respond to the DPE’s requirements within a 7 day timeframe in accordance with Condition A19.</td>
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<td></td>
<td>3. Letter from BCA Logic to HKA, 4 December 2018 Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School, Stage 1 works – Structural Works below Ground Floor Slab Level</td>
<td>4. Ramboll letter to SINSW Re: Independent Environmental Audit - Ultimo Public School (SSD 7503), 6 December 2018</td>
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<td></td>
<td>4. Ramboll letter to SINSW Re: Independent Environmental Audit - Ultimo Public School (SSD 7503), 6 December 2018</td>
<td>Letter from SINSW to DPE, Ultimo PS Project and SSD 7503: Submission of Ultimo PS SSD 7503 Condition B52 Pre Construction Reporting in accordance with SSD 75036 Condition B52, 11 January 2018,</td>
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<td></td>
<td>• Letter from SINSW to DPE, Ultimo PS Project and SSD 7503: Submission of Ultimo PS SSD 7503 Condition B52 Pre Construction Reporting in accordance with SSD 75036 Condition B52, 11 January 2018, Attachments as follows:</td>
<td>1. Ultimo PS SSD 7503 Pre-Construction Compliance Report Rev 3 (including SSD 7503 Consent</td>
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| 1.          |             | 1. Ultimo PS SSD 7503 Pre-Construction Compliance Report Rev 3 (including SSD 7503 Consent |                  |                  |
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<tr>
<td>B53</td>
<td>The Pre-Construction Compliance Report must include: a) details of how the terms of this consent that must be addressed before the commencement of construction have been complied with; and b) the expected commencement date for construction.</td>
<td>• Letter from BCA Logic to HKA, 23 November 2018 Re: SSD 7503 – Pre-commencement Conditions for Ultimo Pyrmont Public School, Stage 1 works – Structural Works below Ground Floor Slab Level • Letter from HKA to DPE Re. Ultimo Public School SSD 7503 Consent – Conditions B52 and B1, 7 December 2018 • SSD 7503 Condition B52 Pre-Commencement Compliance Report, Rev 2, 6 December 2018.</td>
<td>The re-submitted Pre-Construction Compliance Report more closely met the requirements outlined in the DPE’s Compliance Reporting, Post Approval Requirements June 2018 (PAR).</td>
<td>Compliant</td>
</tr>
<tr>
<td>B54</td>
<td>No later than one month prior to the commencement of construction works or within another timeframe agreed with the Planning Secretary, a program of independent environmental audits must be prepared for the development in accordance with the latest version of AS/NZS ISO 19011-2014: Guidelines for Auditing Management Systems (Standards Australia, 2014) and submitted to the Planning Secretary for information.</td>
<td>• Email from HKA to DPE, Re: SSD 7503 – Condition B54, 29 November 2018. • Email from DPE to HKA, Subject: Ultimo Public School SSD 7503 – condition B52 &amp; Condition B1, 3 December 2018.</td>
<td>The Auditors consider that this condition was non-compliant on the basis of submission of the Audit Program to the DPE after commencement of construction. The non-compliance has been rectified and the Auditors make no recommendation for further action. The Audit Program was prepared in accordance with the specified guideline and included audit timing, a scope and relevant Conditions and assumptions for</td>
<td>Non-Compliant</td>
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<td>The scope of each audit must be defined in the program. The program must ensure that environmental performance of the development in relation to each compliance requirement that forms the audit scope is assessed at least once in each audit cycle. The environmental audit program prepared and submitted to the Planning Secretary must be implemented and complied with for the duration of the development.</td>
<td></td>
<td>each stage of the development. The Audit Program and scope of this first Audit were revised on 25 January 2019 following discussions with the DPE.</td>
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<tr>
<td>B55</td>
<td>All independent environmental audits of the development must be conducted by a suitably qualified, experienced and independent team of experts and be documented in an audit report which: a) assesses the environmental performance of the development, and its effects on the surrounding environment including the community; b) assesses whether the development is complying with the terms of this consent; c) reviews the adequacy of any document required under this consent; and d) recommends measures or actions to improve the environmental performance of the development, and improvements to any document required under this consent.</td>
<td>Email from HKA to DPE, 6 December 2018, Re: Ultimo Public School SSD 7503 – Condition B52 &amp; Condition B1, Attachments including: - Ramboll letter to SINSW Re: Independent Environmental Audit - Ultimo Public School (SSD 7503), 6 December 2018.</td>
<td>This Audit report has been prepared to meet the requirements of Condition B55.</td>
<td>Compliant</td>
</tr>
<tr>
<td>B56</td>
<td>Within three months of commencing an Independent Environmental Audit, or within another timeframe agreed by the Planning Secretary, a copy of the audit report must be submitted to the Planning Secretary, and any other NSW agency that requests it, together with a response to any recommendations.</td>
<td></td>
<td>The Audit Program and scope of this first Audit were revised on 25 January 2019 following discussions with the DPE.</td>
<td>Not Triggered</td>
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| B57 | Prior to the commencement of works, a photographic recording of public domain site frontages must be prepared and submitted to the satisfaction of Council. | • Property Condition Survey, Project: Ultimo Public School, Ultimo, Site Surveyed: Council Assets, Jones Street, Quarry Street, Wattle Street, Ultimo NSW 2037, Inspection Date 10 August 2018, Job Reference: AD2482B, Australian Dilapidations.  
  • Hindmarsh email to City of Sydney, 20 August 2018, sighted by the Auditors on 26 February 2019.  
  • Email from City of Sydney to Hindmarsh, Subject: SSD 753 – Condition Satisfied requests for Ultimo School Redevelopment – update as of 13/09/18, 13 September 2018. | The Property Condition Survey of Council Assets, Jones Street, Quarry Street, Wattle Street, Ultimo NSW 2037 comprised the photographic record of public domain site frontages. It was submitted to Council on 20 August 2018, which was prior to commencement of works (22 August 2018).  
  The City of Sydney email dated 13 September 2018 indicates that the Council had received information relating to "B57 – Submission of Photographic recording of public domain." Based on the email subject header it is considered Council was satisfied with the record on the basis that no further action was required. | Compliant |
| B58 | Prior to the commencement of works, a Public Domain Damage Deposit calculated on the basis of 70 lineal metres of concrete site frontage must be lodged with Council in accordance with Council’s adopted Schedule of Fees and Charges. The Public Domain Damage Deposit must be submitted as an unconditional bank guarantee in favour of Council as security for | • ANZ Guarantee No. DG714423418, Date of issue: 10 August 2018, Received by City of Sydney on 24 August 2018.  
  • ANZ Guarantee No. DG712663418, Date of issue: 10 August 2018, | Sighted the bank guarantees for the public domain. | Compliant |
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| B59          | Prior to commencement of construction, the Applicant must incorporate the noise mitigation recommendations in the *Noise and Vibration Assessment*, prepared by JHA and dated 15 March 2018, into the detailed design drawings. The Certifying Authority must verify that all reasonable and feasible noise mitigation measures have been incorporated into the design to ensure the development will not exceed the recommended operational noise levels identified in the *Noise and Vibration Assessment*, prepared by JHA and dated 15 March 2018. | • Email from BCA Logic to DesignInc, 9 January 2019.  
• Ultimo PS SSD 7503 Pre Construction Compliance Matrix 2019.01.10 Rev 3. | The Project’s SSD 7503 Conditions matrix indicates that a document was prepared on 30 August 2018 with a document reference of ‘160204-AC_LTR_B59-60 (1)’. The Auditors consider it likely that it is the JHA letter referred to in the matrix in which JHA’s acoustic consultants “outlines mandatory compliance with Noise and Vibration Assessment - as the selected plant equipment will conform to measures outlined in this report”. The Auditors therefore consider that required information was incorporated into the detailed design drawings prior to the commencement of construction (11 September 2018). The BCA Logic email dated 9 January 2019 indicates that the Certifying Authority had verified that the information had been incorporated into the design in accordance with Conditions B59 and B60. | Compliant |
| B60          | Prior to the commencement of construction, the Applicant must engage an appropriately qualified acoustic consultant to verify final mechanical plant and machinery selections will ensure that operational noise limits specified within the *Noise and Vibration Assessment*, prepared by JHA and dated 15 March 2018, will not be exceeded. | • Email from BCA Logic to DesignInc, 9 January 2019.  
• Ultimo PS SSD 7503 Pre Construction Compliance Matrix 2019.01.10 Rev 3. | The Project’s SSD 7503 Conditions matrix indicates that JHA was engaged as the acoustic consultant for the Project throughout the design and construction phases of the development. The Auditors consider this Condition to be compliant. | Compliant |
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<tr>
<td>C1</td>
<td>A copy of the approved and certified plans, specifications and documents incorporating conditions of approval and certification must be kept on the Subject Site at all times and must be readily available for perusal by any officer of the Planning Secretary, Council or the Certifying Authority.</td>
<td>• Site inspection</td>
<td>Certified plans available in site office in hard copy and soft copy.</td>
<td>Compliant</td>
</tr>
<tr>
<td>C2</td>
<td>Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: a) between 7 am and 6 pm, Mondays to Fridays inclusive; b) between 8 am and 1 pm, Saturdays; and c) no work may be carried out on Sundays or public holidays.</td>
<td>• Interview with Project Manager and Construction Project Manager</td>
<td>See Condition C3.</td>
<td>Compliant</td>
</tr>
<tr>
<td>C3</td>
<td>Activities may be undertaken outside of these hours: a) if required by the Police or a public authority for the delivery of vehicles, plant or materials; or b) if required in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or c) works are inaudible at the nearest sensitive receivers; or d) if a variation is approved in advance in writing by the Planning Secretary or her nominee; and e) notification of such activities must be given to affected residents before</td>
<td>• Interview with Project Manager and Construction Project Manager</td>
<td>Deliveries of plant and equipment have occurred outside of the hours specified in Condition C2 at the direction of Roads &amp; Maritime Services.</td>
<td>Compliant</td>
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<td>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</td>
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<td>undertaking the activities or as soon as is practical afterwards.</td>
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<td>C4</td>
<td>Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: 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.</td>
<td>No rock breaking, rock hammering, sheet piling or pile driving activities have occurred.</td>
<td></td>
<td>Not Triggered</td>
</tr>
</tbody>
</table>
| C5          | The development must be constructed with the aim of achieving the construction noise management levels detailed in the Interim Construction Noise Guideline (Department of Environment and Climate Change, 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 CNVMP required under Condition B29. | • Site inspection  
• Complaints Register | No noise complaints have been recorded since early November 2018, indicating that actions taken to address early complaints have been adequate. | Compliant         |
<p>| C6          | If the noise from a construction activity is substantially tonal or impulsive in nature (as described in Fact Sheet C of the Noise Policy for Industry), 5 dB(A) must be added to the measured construction noise level when comparing the measured noise with the construction noise management levels. |                                                        |                                                                       | Not Triggered     |
| C7          | The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the Subject Site or surrounding residential precincts | • Interview with Project Manager and Construction Project Manager | As permitted by Condition C3, deliveries of plant and equipment have occurred outside of the hours specified in Condition C2 at the direction of Roads &amp; Maritime Services. | Compliant         |</p>
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</table>
| C8           | The Applicant must schedule intra-day ‘respite periods’ for construction activities identified in the [Interim Construction Noise Guideline](https://example.com) (Department of Environment and Climate Change, 2009) as being particularly annoying or intrusive to noise sensitive receivers. These activities are to be carried out after 8 am only and over continuous periods no exceeding three hours (with at least a one hour respite every three hours). | Site inspection  
• Interview with Project Manager and Construction Project Manager | Augered piles have been used. | Not Triggered |
| C9           | Wherever practical, and where sensitive receivers may be affected, piling activities are completed using bored piles. If driven piles are required they must only be installed where outlined in a [CNVMP required under Condition B29](https://example.com). | Site inspection  
• Interview with Project Manager and Construction Project Manager | Augered piles have been used. | Compliant |
| C10          | 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. | Site inspection  
• Complaints Register | No noise complaints relating to the use audible movement alarms have been recorded. | Compliant |
| C11          | 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](https://example.com) or exceed approved noise limits for the Subject Site. | Site inspection  
• Complaints Register | No noise monitoring has been conducted to date. Two noise complaints were received during early works which related to a temporary generator that had been located near the southern site boundary. A third noise complaint is recorded in early November. No noise complaints have been recorded since early November 2018. | Compliant |
| C12          | The Applicant must ensure construction of the development is carried out in | Site inspection | | Compliant |
### Table A-3: Compliance with Development Consent SSD 7503 Part C Conditions

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|               | accordance with the recommendations outlined in *Noise and Vibration Assessment*, prepared by JHA and dated 15 March 2018. | • Interview with Project Manager and Construction Project Manager  
• Complaints Register | Vibratory compactors and impulsive construction methods have not been used. All piling has been augered/bored. | Compliant |
| C13           | Vibration caused by the construction works at any residence or structure outside the Subject Site must be limited to:  
a) for structural damage vibration, German Standard DIN 4150 Part 3 *Structural Vibration in Buildings. Effects on Structures*;  
b) for human exposure to vibration, the evaluation criteria presented in British Standard BS 6472 - *Guide to Evaluate Human Exposure to Vibration in Buildings* (1 Hz to 80 Hz) for low probability of adverse comment;  
c) vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified above; and  
d) these limits apply unless otherwise outlined in the CNVMP required under Condition B29 and submitted to the satisfaction of the Certifying Authority. | • Interview with Construction Project Manager | | |
<p>| C14           | All waste generated during construction must be assess, classified and managed in accordance with the <em>Waste Classification Guidelines Part 1: Classifying Waste</em> (EPA, 2014). | • EIAustralia waste classification certificate E24028.E05.003 dated 28/11/18 (sighted) | EIAustralia has undertaken waste classification of excavation spoil stockpiles. Spoils has generally been classified as General Solid Waste in the lower ( western) part of the site or Asbestos Waste/General Solid Waste in the upper (eastern) part of the site. | Compliant |</p>
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<tr>
<td>C15</td>
<td>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.</td>
<td>• Site inspection</td>
<td>No evidence of concrete or rinse water disposal sighted during site inspection. Incident Register records an incident involving a minor spill of concrete from a delivery arriving at the site. The spill was cleaned up immediately.</td>
<td>Compliant</td>
</tr>
</tbody>
</table>
| C16         | The Applicant must ensure that concrete waste and rinse water are not disposed of on the Subject Site and are prevented from entering any natural of artificial watercourse. | • Site inspection  
• Incident Register | SafeWork NSW was notified upon discovery of fibre cement sheet fragments on the ground surface. WorkSafe attended the site. WorkSafe was also informed when the fragments were removed from site for disposal. Asbestos Waste has been disposed of to the Genesis Eastern Creek waste facility which is licensed to accept Asbestos Waste (EPL 13426). | Compliant |
| C17         | 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. | • Interview with Construction Project Manager  
• Genesis Eastern Creek waste docket GEN0057173-1 (sighted)  
• Genesis Eastern Creek waste summary (sighted) | This Condition is considered non-compliant as a tree was removed without Council approval. Council had approved removal of two large street trees on Wattle Street; however, a small tree that had not been approved was also removed in error. Council was notified and an agreement has been reached with Council for replacement of the tree at the completion of construction. No Audit recommendation is made in this regard. Refer to Conditions A18 | Non-compliant |
| C18         | a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; b) all street trees must be protected at all times during construction. Any tree on the footpath, which is damaged or | • Site inspection  
• Incident Register  
• Interview with Construction Project Manager | | |
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<td>removed during construction due to an emergency, must be replaced, to the satisfaction of Council; c) all trees on the Subject Site that are not approved for removal must be suitably protected during construction as per recommendations of the Arboricultural Assessment and Development Impact Report, prepared by Raintree Consulting and dated October 2017; and d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.</td>
<td>and A19 for recommendations concerning notification requirements. Street trees along Jones and Quarry Streets have been fitted with protective barriers certified by an arborist. Provision of the arborist’s certificate to Council was a pre-requisite for issue of a hoarding permit.</td>
<td></td>
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<tr>
<td>C19</td>
<td>Any trees planted (that would reach a height of &gt;8 metres at maturity) as part of the approved Landscape Plan must be a minimum pot size of 100L, be a locally endemic species and be endorsed by a suitably qualified and experienced person(s). The trees are to be staked and regularly maintained for a minimum of 12 months.</td>
<td>Not Triggered</td>
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### Table A-3: Compliance with Development Consent SSD 7503 Part C Conditions

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|               | months. Confirmation that all trees have been planted in accordance with this condition (including number of trees) must be provided to the Certifying Authority prior to operation unless otherwise agreed by the Planning Secretary. | • Site inspection  
• ESCP (TTW, Rev G, 19/9/18)  
• Incident Register  
• Interview with Construction Project Manager | The auditors observed sediment and erosion control measures in place during the site inspection. Heavy rainfall on 28 November 2019 resulted in an overflow of sediment laden water to an adjoining property. The Auditors sighted evidence in the site diary that additional control measures had been put in place in advance of the rain event. Despite the additional measures, there was an escape of sediment to a neighbour, which was remedied by the construction contractor. | Compliant |
| C20           | 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. | • Site inspection  
• Incident Register  
• Interview with Project Manager and Construction Project Manager | | |
|               | C21 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 Environment Protection Authority in accordance with the Protection of the Environment Operations Act 1997. | • Site inspection  
• Incident Register  
• Interview with Project Manager and Construction Project Manager | Site is currently unsealed. Rainwater that does not percolate into the surface flows to the lower (Wattle Street) side of the site and is directed to a sump in the north western corner or to a secondary sump in the south western corner. From there, it is allowed to percolate, evaporate or, if necessary, is pumped out by a waste contractor. | Compliant |
<p>|               | C22 All construction vehicles (excluding worker vehicles) are to be contained wholly within the Site and vehicles must enter the Site before stopping. | • Site inspection | Traffic controllers are employed when works zones and vehicle access gate are in use. No vehicles were observed entering or leaving the site during the site inspection; however, the Auditors have no reason to believe the condition is not be complied with. | Compliant |
|               | C23 A Road Occupancy Licence must be obtained from the Transport Management Centre (TMC) for any works that impact on traffic flows during construction activities. | • RMS licence 1079848 | Current licence valid from 30/11/2018 to 28/02/2019. | Compliant |</p>
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<tr>
<td>C24</td>
<td>a) A site notice(s) must be prominently displayed at the boundaries of the Subject Site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifying Authority and Structural Engineer. b) The site notice(s) is to satisfy all but not be limited to, the following requirements: i) minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size; ii) the notice is to be durable and weatherproof and is to be displayed throughout the works period; iii) the approved hours of work, the name of the site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and iv) the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the Subject Site is not permitted.</td>
<td>Site inspection</td>
<td>Site notices displayed and site entrances on Quarry Street and Wattle street.</td>
<td>Compliant</td>
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<tr>
<td>C25</td>
<td>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.</td>
<td>Site inspection, Incident Register, Interview with Project Manager and Construction Project Manager</td>
<td>SafeWork NSW has attended the site once, in response to a notification of asbestos being found. There have been no other incidents or injuries requiring reporting to SafeWork.</td>
<td>Compliant</td>
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</table>
Table A-3: Compliance with Development Consent SSD 7503 Part C Conditions

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<tbody>
<tr>
<td>C26</td>
<td>The following hoarding requirements must be complied with:</td>
<td>• Site inspection</td>
<td>A hoarding permit has been issued by the City of Sydney. No advertising or graffiti was observed on the hoarding during the site inspection.</td>
<td>Compliant</td>
</tr>
<tr>
<td></td>
<td>a) no third-party advertising is permitted to be displayed on the subject</td>
<td>• Hoarding permit B/2018/395</td>
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<td>hoarding/fencing;</td>
<td>• Interview with Project Manager and Construction Project Manager</td>
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<td>b) the construction site manager must be responsible for the removal of all</td>
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<td>graffiti from any construction hoardings or the like within the construction</td>
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<td>area within 48 hours of its application; and</td>
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<td>c) the Applicant must submit a hoarding application to Council for the</td>
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<td>installation of any hoardings over Council footways or road reserve.</td>
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<tr>
<td>C27</td>
<td>The public way (outside of any construction works zone) must not be</td>
<td>• Site inspection</td>
<td>Works zones are present along the Wattle Street and Jones Street frontages. Traffic controllers are employed when a works zone is in use.</td>
<td>Compliant</td>
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<td>obstructed by any materials, vehicles, refuse, skips or the like, under and</td>
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<td>circumstances. Non-compliance with this requirement will result in the</td>
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<td>issue of a notice by the relevant Authority to stop all works on site.</td>
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<tr>
<td>C28</td>
<td>If any unexpected archaeological relics are uncovered during the work, then</td>
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<td>Not Triggered</td>
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<td>all works must cease immediately in that area and the OEH Heritage Division</td>
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<td>contacted. Depending on the possible significance of the relics, an</td>
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<td>archaeological assessment and management strategy may be required before</td>
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<td>further works can continue in that area. Works may only recommence with</td>
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<td>the written approval of Heritage Division of OEH.</td>
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### Table A-3: Compliance with Development Consent SSD 7503 Part C Conditions

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<tr>
<td>C29</td>
<td>In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by OEH and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and OEH to develop and implement management strategies for all projects/sites. Works may only recommence with the written approval of OEH.</td>
<td>School Infrastructure website</td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>C30</td>
<td>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 prepared, obtained or approved) publicly available on its website: i) the documents referred to in Condition A2 of this consent; ii) all current statutory approvals for the development;</td>
<td>School Infrastructure website</td>
<td><a href="https://www.schoolinfrastructure.nsw.gov.au/projects/u/ultimo-public-school.html">https://www.schoolinfrastructure.nsw.gov.au/projects/u/ultimo-public-school.html</a> provides: • A link to the DPE Major Projects website, where the consent, modifications and documents referred to in Condition A2 can be found. • A summary of the progress of the development. • A copy of the Complaints Register. Monitoring is not required under the conditions of consent or plans and programs that required approval of the secretary, As such, no monitoring results are available on the website.</td>
<td>Compliant</td>
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### Table A-3: Compliance with Development Consent SSD 7503 Part C Conditions

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<tr>
<td>C31</td>
<td>Within six months of the date of this consent the Applicant must make the following:</td>
<td>School Infrastructure website</td>
<td>Refer to Condition C30.</td>
<td>Compliant</td>
</tr>
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</table>

- iii) all approved strategies, plans and programs required under the conditions of this consent;
- iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;
- v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;
- vi) a summary of the current stage and progress of the development;
- vii) contact details to enquire about the development or to make a complaint;
- viii) a complaints register, updated monthly;
- ix) audit reports prepared as part of any independent environmental audit of the development and the Applicant’s response to the recommendations in any audit report;
- x) any other matter required by the Planning Secretary; and

b) keep such information up to date, to the approval of the Certifying Authority.
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<td>information publicly available on its website and keep the information up to date: a) the EIS; b) current statutory approvals for the Development; c) approved strategies, plans or programs; d) a complaints register, updated on an annual basis; and e) any other matter required by the Planning Secretary.</td>
<td>• Email from Project Director to DPE dated 5/02/19 with attachments: - Letter from Project Director to the Planning Secretary dated 5/02/19. - Construction Compliance Report, DNV GL Business Assurance Australia, 23-25 January 2019.</td>
<td>The first Construction Compliance Report was submitted to the DPE on 5 February 2019. The Compliance Report included a summary of complaints received and incidents. The Compliance Report found partial non-compliance with Conditions C25 (in relation to security) and C26 (in relation to graffiti on the hoarding). The Auditors did not identify non-compliance in relation to these conditions.</td>
<td>Compliant</td>
</tr>
<tr>
<td>C32</td>
<td>Construction <strong>Compliance Reports</strong> must be submitted to the Planning Secretary at for information every six months from the date of the commencement of construction, for the duration of construction. The Construction Compliance Reports must provide details on the compliance performance of the development for the preceding six months and must be submitted within one month following the end of each six-month period for the duration of construction of the development, or such other timeframe as required by the Planning Secretary. The <strong>Construction Compliance Reports</strong> must include: a) a results summary and analysis of environmental monitoring; b) the number of any complaints received, including a summary of main areas of complaint, action taken,</td>
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<tr>
<td>C33</td>
<td>Within 24 hours of the occurrence of an incident that causes (or may cause) harm to the environment, the Applicant must notify the Planning Secretary and any other relevant agencies of the incident in accordance with the requirements outlined in Conditions A15 to A20.</td>
<td></td>
<td>The Auditors do not consider accidental removal of a small tree without approval by mistake (Condition C18) to have triggered this requirement.</td>
<td>Not triggered</td>
</tr>
<tr>
<td>C34</td>
<td>Within seven days of the detection of the incident, the Applicant must provide the Planning Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested in accordance with Condition A15</td>
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<td></td>
<td>Not triggered</td>
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<tr>
<td>C35</td>
<td>The Applicant must provide regular (six monthly) reporting on any environmental performance required by the development consent for the development on its project website, in accordance with the reporting arrangements in any plans or other documents approved under the conditions of this consent.</td>
<td>School Infrastructure website</td>
<td>Refer to Condition C30.</td>
<td>Compliant</td>
</tr>
<tr>
<td>C36</td>
<td>The Applicant must ensure that all of its employees, contractors (and their subcontractors) 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.</td>
<td>Interview with Project Manager and Construction Project Manager</td>
<td>Employees, contractors and subcontractors undergo site induction.</td>
<td>Compliant</td>
</tr>
<tr>
<td>C37</td>
<td><strong>Construction Compliance Reports</strong> must be submitted to the Planning Secretary at <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> for information every six months from the date of the commencement of construction, for the duration of construction. The Construction Compliance Reports must provide details on the compliance performance of the development for the preceding six months and must be submitted within one month following the end of each six-month period for the duration of the construction of the development, or such other timeframe as required by the Planning Secretary.</td>
<td>• See Condition C32</td>
<td>See Condition C32.</td>
<td>Compliant</td>
</tr>
<tr>
<td>C38</td>
<td>The <strong>Construction Compliance Reports</strong> must include:</td>
<td>• See Condition C32</td>
<td>See Condition C32.</td>
<td>Compliant</td>
</tr>
</tbody>
</table>
Table A-3: Compliance with Development Consent SSD 7503 Part C Conditions

<table>
<thead>
<tr>
<th>APPROVAL (ID)</th>
<th>REQUIREMENT</th>
<th>EVIDENCE COLLECTED</th>
<th>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</th>
<th>COMPLIANCE STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>a) results summary and analysis of environmental monitoring; b) the number of any complaints received, including a summary of main areas of complaint, action taken, response given and proposed strategies for reducing the recurrence of such complaints; c) details of any review of the CEMP and associated sub-plans as a result of construction carried out during the reporting period; d) a register of any modifications undertaken and their status; e) results of any independent environmental audits and details of any actions taken in response to the recommendations of an audit; f) a summary of all incidents notified in accordance with this consent; and g) any other matter relating to compliance with the terms of this consent or as requested by the Planning Secretary.</td>
<td></td>
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</tr>
<tr>
<td>C39</td>
<td>Unless the Applicant and the applicable authority agree otherwise, the Applicant must: 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</td>
<td></td>
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<td>Not Triggered</td>
</tr>
<tr>
<td>APPROVAL (ID)</td>
<td>REQUIREMENT</td>
<td>EVIDENCE COLLECTED</td>
<td>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</td>
<td>COMPLIANCE STATUS</td>
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<tr>
<td>C40</td>
<td>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 NCC.</td>
<td>• Crown Certificate – Main Works, BCA Logic, Ref 106876-2, 8 January 2019</td>
<td>BCA Logic issued a Crown Certificate for the Main Works which certifies compliance with the Building Code of Australia (BCA) subject to conditions in Attachment C to the Certificate being met.</td>
<td>Compliant</td>
</tr>
<tr>
<td>C41</td>
<td>All excavations and backfilling on public land associated with the development must be executed in accordance with the appropriate safety standards. All excavations must be properly guarded and protected to prevent them from being dangerous to life and property.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>C42</td>
<td>All existing stones kerbs on the Jones Street, Quarry Street and Wattle Road frontages must be retained and protected during excavation and construction in accordance with the requirements of Council.</td>
<td>• Site inspection • Interview with Project Manager and Construction Project Manager</td>
<td>Two kerb stones have been lifted on Wattle Street near the corner of Quarry Street to allow access for drainage works. The stones have been retained and will be reinstated at the completion of the drainage works. The area has been barricaded with the approval of RMS.</td>
<td>Compliant</td>
</tr>
</tbody>
</table>
### Table A-4: Compliance with Development Consent SSD 7503 Part D Conditions

<table>
<thead>
<tr>
<th>Approval ID</th>
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<tbody>
<tr>
<td><strong>Part D – Prior to Occupation or Commencement of Use</strong></td>
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<tr>
<td>D1</td>
<td>Prior to occupation a <strong>Road Safety Audit (RSA)</strong>, prepared by suitably qualified consultant, must be undertaken of the drop-off/pick-up area and bus layby design along Quarry Street and Jones Street, in consultation with Transport for New South Wales, and any recommendations of the <strong>RSA</strong> must be implemented into the final drop-off/pick-up and bus layby design. The Applicant must submit the <strong>RSA</strong> to the approval of the Certifying Authority prior to occupation.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D2</td>
<td><strong>An Operational Noise Management Plan (ONMP)</strong> must be prepared prior to the commencement of operation, to the approval of the Certifying Authority that includes, but is not limited to: a) a description of each type of event, activity and/or use to be undertaken, including a description of any amplification systems; b) identification of noise sensitive receivers, existing and proposed, likely to be adversely affected by activities undertaken; c) details of a noise monitoring program that monitors sound levels from use outside of school use and retains records of the results and details of the monitoring equipment used, including its location and settings; d) clearly defined noise management objectives that incorporates all recommended mitigation measures contained in the Noise and Vibration Assessment, prepared by JHA and dated 15 March 2018;</td>
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<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>APPROVAL (ID)</td>
<td>REQUIREMENT</td>
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<td></td>
<td>e) details of a noise complaints handling procedure and actions to be taken at the time of each complaint to monitor and minimise noise impacts. The procedures must include: i) the time and date each complaint was received; ii) how the complaint was received; iii) the contact details of the person lodging the complaint; iv) the proposed actions to prevent a reoccurrence of the noise impact; f) a program for review of the ONMP, including ongoing assessment and improvement of the ONMP. The program must address the effectiveness of: i) community consultation (consultation prior to, during (complaints handling and response) and after events and activities described in part a) and consultation as part of the plan review process); ii) the use of technology or the setup procedures to mitigate or prevent noise impacts; iii) the use of real time mitigation measures to mitigate or prevent noise impacts; iv) the use of monitoring programs, the monitoring data records and community consultation information to prevent or mitigate noise impacts; and g) the program of review must also provide an Implementation Strategy, that commits to specific management actions, including operational procedures to be implemented along with timeframes. The specific</td>
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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>D3</td>
<td>Details must be provided to the approval of the Certifying Authority demonstrating that the <strong>ONMP</strong> has been prepared in consultation with Council.</td>
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<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D4</td>
<td>The <strong>ONMP</strong> (as revised from time to time) must be implemented by the Applicant for the life of the development.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D5</td>
<td><strong>OPTAMP</strong> is to be prepared for the Subject Site by a suitably qualified person, and must address the following: a) detailed pedestrian analysis including the identification of safe route options – to identify the need for management measures 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 campus 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 located within Quarry Street and Jones Street (and/or alternate locations), including staff management/traffic controller arrangements; d) the location and operational management procedures for the pick-up and drop-off of</td>
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</table>
### Table A-4: Compliance with Development Consent SSD 7503 Part D Conditions

<table>
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<tr>
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<tbody>
<tr>
<td></td>
<td>students by buses and coaches for excursions and sporting activities, including staff management/traffic controller arrangements; e) delivery and services vehicle and bus access and management arrangements; f) management of approved access arrangements; g) car parking arrangements and management associated with the proposed use of school facilities by community members; h) a monitoring and review program; i) evidence of any consultation; j) outcomes of Conditions D1, D6 – D9 and E1; k) school speed zones; l) car parking restrictions and signage within, and in the vicinity of the site; and m) any required interim upgrading or widening of footpaths to facilitate safe access.</td>
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</tr>
<tr>
<td>D6</td>
<td>The <strong>OPTAMP</strong> is to be prepared in consultation with Council, TfNSW and RMS, and local bus service providers (where relevant) and submitted to the satisfaction of the Certifying Authority.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D7</td>
<td>The <strong>OPTAMP</strong> (as revised from time to time including where final arrangements replace interim measures) must be implemented by the Applicant for the life of the development.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D8</td>
<td>Prior to the commencement of operation, the Applicant must obtain approval from Council to convert the northern 25 metres of the bus zone on Jones Street adjacent the Subject Site to a 'no parking' pick-up/drop-off zone.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D9</td>
<td>The drop-off/pick-up zone Quarry Street and Jones Street must be monitored during the AM</td>
<td></td>
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<td>Not Triggered</td>
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</tbody>
</table>
Table A-4: Compliance with Development Consent SSD 7503 Part D Conditions

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<tbody>
<tr>
<td></td>
<td>and PM peak drop-off/pick-up periods twice weekly for the first school term of operation and one day per week during the AM and PM peak drop-off/pick-up period for the second school term of operation unless otherwise agreed by the Planning Secretary. A monthly report over a six-month period must be prepared by a suitably qualified person including a discussion of the results of the monitoring including:</td>
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<td></td>
<td>a) Time period monitored (date, time);</td>
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<td></td>
<td>b) Number of students exiting/alighting vehicles;</td>
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<td>c) Number of vehicles using the drop-off/pick-up zone;</td>
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<td></td>
<td>d) Length of time each vehicle loads/unloads students;</td>
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<td></td>
<td>e) An assessment of how the drop-off/pick-up zone is operating, and whether there is any observed impact on the Quarry Street/Jones Street and Wattle Road/Quarry Street intersections (e.g. queuing, illegal stopping, safety etc);</td>
<td></td>
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<td>f) verification based of the results of traffic surveys at similar Sites; and</td>
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<td></td>
<td>g) Any other relevant information as required. If after six months of operation, the results of the monitoring indicate insufficient capacity of the drop-off/pick-up zone, alternative arrangements must be made in consultation with Council, TfNSW and RMS to address this issue. Alternative arrangements are to be incorporated into an updated OPTAMP and submitted to the Planning Secretary for approval.</td>
<td></td>
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</tr>
<tr>
<td>Approval ID</td>
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</tr>
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<td>------------</td>
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</tr>
<tr>
<td>D10</td>
<td>Following completion, installation and testing of all mechanical ventilation systems, the Applicant must provide evidence to the satisfaction of the Certifying Authority, prior to the final occupation, that the installation and performance of the mechanical systems complies with: a) the BCA; b) AS 1668.2-2012 <em>The use of air-conditioning in buildings – Mechanical ventilation in buildings</em> and other relevant codes; c) the development consent and any relevant modifications; and d) any dispensation granted by the NSW Fire Brigade.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D11</td>
<td>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 the occupation of the new development.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D12</td>
<td>A Section 73 Compliance Certificate under the <em>Sydney Water Act 1994</em> must be obtained from Sydney Water Corporation. Application must be made through an authorised Water Servicing Coordinator. Please refer to the “Your Business” section of the web site <a href="http://www.sydneywater.com.au">www.sydneywater.com.au</a> then follow the “e-Developer” icon or telephone 13 20 92 for assistance.</td>
<td></td>
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<td>Not Triggered</td>
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</tbody>
</table>
## Table A-4: Compliance with Development Consent SSD 7503 Part D Conditions

<table>
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</tr>
</thead>
<tbody>
<tr>
<td>The Section 73 Certificate must be submitted to the Certifying Authority prior to the commencement of use.</td>
<td></td>
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</tr>
<tr>
<td>D13</td>
<td>A compliance certificate under the section 307 of the Water Management Act 2000 must be obtained from Council. The certificate must be submitted to the Certifying Authority prior to the occupation of the development.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D14</td>
<td>a) Prior to operation, the Applicant must engage a suitably qualified person to prepare a post-construction dilapidation report at the completion of the construction works. This report is to ascertain whether the construction works created any structural damage to adjoining buildings or infrastructure. b) The report is to be submitted to the Certifying Authority. In ascertaining whether adverse structural damage has occurred to adjoining buildings or infrastructure, the Certifying Authority must: 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. b) A copy of this report is to be forwarded to Council.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D15</td>
<td>Prior to the final occupation of the school, a <strong>Fire Safety Certificate</strong> must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire</td>
<td></td>
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<td>Not Triggered</td>
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</tbody>
</table>
**Table A-4: Compliance with Development Consent SSD 7503 Part D Conditions**

<table>
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</thead>
<tbody>
<tr>
<td>D16</td>
<td><strong>A Structural Inspection Certificate</strong> or a <strong>Compliance Certificate</strong> must be submitted to the satisfaction of the Certifying Authority prior to the occupation of the relevant parts of any new or refurbished buildings. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the approval authority and the Council after: a) the site has been periodically inspected and the Certifying Authority is satisfied that the structural works is deemed to comply with the final design drawings; and b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.</td>
<td>-</td>
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<td>Not Triggered</td>
</tr>
<tr>
<td>D17</td>
<td>Way-finding signage and signage identifying the location of staff car parking must be installed prior to occupation.</td>
<td>-</td>
<td>-</td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D18</td>
<td>Bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas prior to occupation.</td>
<td>-</td>
<td>-</td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D19</td>
<td>‘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.</td>
<td>-</td>
<td>-</td>
<td>Not Triggered</td>
</tr>
<tr>
<td>D20</td>
<td>An <strong>Operation and Maintenance Plan (OMP)</strong> is to be prepared to ensure proposed</td>
<td>-</td>
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<td>Not Triggered</td>
</tr>
<tr>
<td>APPROVAL (ID)</td>
<td>REQUIREMENT</td>
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<tr>
<td>stormwater quality measures remain effective. The <strong>OMP</strong> 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.</td>
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<tr>
<td>D21</td>
<td>Details demonstrating compliance must be submitted to the Certifying Authority prior to occupation.</td>
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<tr>
<td>D22</td>
<td>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. A signed works-as-executed Rainwater Re-use Plan must be provided to the Certifying Authority prior to the issue of the final Occupation Certificate.</td>
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<tr>
<td>D23</td>
<td>The installation, operation and maintenance of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Parts 1 and 2 (or Part 3 if a Performance-based water cooling system) of <strong>AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance</strong> and the NSW Health Code of Practice for the Control of Legionnaires’ Disease.</td>
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<tr>
<td>D24</td>
<td>A <strong>Pre-Operation Compliance Report</strong> must be prepared and submitted to the Planning Secretary for information no later than one month before the commencement of operation or within another timeframe agreed with the</td>
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**Table A-4: Compliance with Development Consent SSD 7503 Part D Conditions**
### Table A-4: Compliance with Development Consent SSD 7503 Part D Conditions

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</table>
| D25      | Planning Secretary. The Pre-Operation Compliance Report must include:  
  a) details of how the terms of this approval that must be addressed before the commencement of operation have been complied with; and  
  b) the commencement date for operation. Operation of the building must not commence until the Pre-Operation Compliance Report has been submitted for information to the Planning Secretary. | | | |
|          | The **Green Travel Plan (GTP)**, prepared by ARUP and dated 19 April 2018, must be revised by a suitably qualified traffic consultant and submitted to the approval of the Certifying Authority prior to occupation. The GTP must address, but not limited to, the following:  
  a) 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;  
  b) address any misalignment of the mode share target for the number of students being dropped off at school by car;  
  c) specific tools and actions to help achieve the objectives and mode share targets;  
  d) 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;  
  e) 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 | | | Not Triggered |
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<tbody>
<tr>
<td>D26</td>
<td>The GTP (as revised from time to time) must be implemented by the Applicant, or person/s authorised to, for the life of the development.</td>
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<tr>
<td>D27</td>
<td>Where cooking facilities are proposed, the Applicant is to obtain a certificate from a suitably qualified tradesperson, certifying that the kitchen, food storage and food preparation areas have been fitted in accordance with the AS 4674 Design, construction and fit-out of food premises. The Applicant must provide evidence of receipt of the certificate to the satisfaction of the Certifying Authority prior to occupation.</td>
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<tr>
<td>E1</td>
<td>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.</td>
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<td>Not Triggered</td>
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<td>E2</td>
<td>The Green Travel Plan required by Condition D24 of this consent must be updated annually and implemented.</td>
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<td>Not Triggered</td>
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<tr>
<td>E3</td>
<td>The use of the community hall and sports courts outside of school use must at all times comply with the approved ONMP required under Condition D2 of this consent.</td>
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<td>Not Triggered</td>
</tr>
<tr>
<td>E4</td>
<td>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.</td>
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<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>E5</td>
<td>Noise associated with the operation of any plant, machinery, School public address system, school bell or other equipment on the Subject Site, must not exceed 5 dB(A) above the background noise level when measured at the boundary of any sensitive receiver.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>E6</td>
<td>Grounds maintenance involving the use of power equipment must be restricted to between 7:30 am and 6:00 pm Mondays to Fridays.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>E7</td>
<td>Waste collection services must only be undertaken between 7:30 am and 6:00 pm Mondays to Fridays.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
</tbody>
</table>
### Table A-5: Compliance with Development Consent SSD 7503 Part E Conditions

<table>
<thead>
<tr>
<th>APPROVAL (ID)</th>
<th>REQUIREMENT</th>
<th>EVIDENCE COLLECTED</th>
<th>INDEPENDENT AUDIT FINDINGS AND RECOMMENDATIONS</th>
<th>COMPLIANCE STATUS</th>
</tr>
</thead>
</table>
| E8           | Community use of the games courts is restricted to the following:  
a) no earlier than 12:00 pm (midday) and no later than 6:00 pm, Monday to Friday; and  
b) between 8:00 am and 6:00 pm Saturdays. | | | Not Triggered |
| E9           | The Applicant must carry out a noise monitoring program of representative uses of the hall and games court outside of school hours to demonstrate that the level, nature, quality and character of noise emitted by those uses. The noise monitoring must be carried out by an appropriately qualified person and a monitoring report must be submitted to the Planning Secretary within six months of full occupation of the building to verify that operational noise levels do not exceed the recommended noise levels identified in the Noise and Vibration Assessment, prepared by JHA and dated 15 March 2018. | | | Not Triggered |
| E10          | Should the noise monitoring required under Condition E9 identify any exceedance of the recommended noise levels, the Applicant must implement appropriate on-site noise attenuation measures to ensure operational noise levels do not exceed the recommended noise levels and/or provide noise attenuation measures at the affected noise sensitive receivers. | | | Not Triggered |
| E11          | The implementation of noise attenuation measures, on-site and at the affected receiver(s), if required, must be provided within three months of the completion of the short-term noise monitoring required under Condition | | | Not Triggered |
Table A-5: Compliance with Development Consent SSD 7503 Part E Conditions

<table>
<thead>
<tr>
<th>Approval (ID)</th>
<th>Requirement</th>
<th>Evidence Collected</th>
<th>Independent Audit Findings and Recommendations</th>
<th>Compliance Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>E9</td>
<td>E9, or other appropriate period as agreed by the Planning Secretary.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>E12</td>
<td>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.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>E13</td>
<td>All loading and unloading of service vehicles in connection with the use of the premises must be carried out wholly within the Subject Site at all times.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>E14</td>
<td>External Lighting must comply with AS 4282-1997 Control of the obtrusive effects of outdoor lighting. Upon installation of lighting, but before it is finally commissioned, the Applicant must submit to the Certifying Authority evidence from a qualified practitioner demonstrating compliance in accordance with this Condition.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>E15</td>
<td>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.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
<tr>
<td>E16</td>
<td>The landscaping is to be maintained at all times following its installation in accordance with the approved Landscape Plan.</td>
<td></td>
<td></td>
<td>Not Triggered</td>
</tr>
</tbody>
</table>
APPENDIX B
AUDIT TEAM LETTER
6 December 2018

Mr David Spare
Project Director Infrastructure Projects
Level 8, 259 George Street, Sydney NSW 2000
david.spare@det.nsw.edu.au |

Dear Sir,

RE: Independent Environmental Audit - Ultimo Public School (SSD 7503)

1. INTRODUCTION

Ramboll Australia Pty Ltd (Ramboll) is pleased to provide the following information for submission to the Department of Planning and Environment (DPE) regarding the proposed audit team to undertake the initial Independent Environmental Audit (IEA) of the Ultimo Public School project as required under development consent SSD 7503.

2. PROPOSED AUDIT TEAM

The Audit Team will comprise Victoria Sedwick, Rosebud Yu, Emily Rowe and David Ford. The oversight and peer review of the Audit will be undertaken by Victoria Sedwick who is an Exemplar Global Registered Lead Environmental Auditor. All of the proposed team have previously been approved by the DPE to undertake IEAs. Resumes of the proposed audit team are attached to this letter.

3. INDEPENDENCE

Ramboll is independent from the project and confirms that the proposed audit team members:

1. Are not related to any proponent, owner, operator or other entity involved in the delivery of the project (such relationships include that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child);
2. Do not have any pecuniary interest in the project, proponent or related entities (such interests includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child);
3. Have not provided services (not including independent reviews or auditing) to the project with the result that they audit work performed...
by themselves or their company, except as otherwise declared to the Department prior to the audit;

4. Are not an Environmental Representative for the project; and

5. Will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

For full disclosure, Rowena Salmon of Ramboll is a NSW EPA accredited contaminated land Site Auditor. Rowena is currently conducting contaminated land Site Audits of several school projects, not including Ultimo Public School.

* * *

We trust the information meets your requirements for submission to the DPE. Please contact the undersigned if you have any queries.

Yours faithfully,
Ramboll Australia Pty Ltd

Victoria Sedwick
Principal

Enclosures: Resumes
AUDIT TEAM RESUMES
VICTORIA SEDWICK

Principal

Victoria Sedwick has over 30 years’ experience in manufacturing and environmental consulting. Her areas of expertise include environmental, health and safety compliance auditing and management systems; mergers and acquisitions and property due diligence; contaminated site assessment and remediation advice; sustainability; and chemical and dangerous goods management. Consulting experience includes waste industry; ports and transportation infrastructure; aerospace manufacturing and airline industries; energy, power generation and distribution; downstream petroleum (refining, distribution and retail) and upstream gas; mining equipment; building products manufacturing; defence facilities; chemical manufacturing; mining, metals and minerals processing; explosives; tourism; pharmaceutical, food and beverage manufacturing; packaging industries. She has managed environmental health and safety audits and due diligence of many multinational and high-profile acquisitions and divestments and she provides strategic advice on several large contaminated sites projects and compliance assurance programs. Victoria is certified as a lead environmental auditor on the Exemplar Global (formerly RABQSA) register.

CAREER
2007 – Present
Principal, Ramboll Environ Australia Pty Ltd (formerly ENVIRO
Environmental consulting in due diligence, compliance and site investigations

1992-2007
Senior Principal, URS Australia Pty Ltd (formerly AGC Woodward-Clyde)
Environmental consulting in due diligence, compliance and site investigations

1988-1992
Senior Risk Management Consultant, Marsh and McLennan (now Marsh)
EHS consulting in compliance auditing and EDD

1980-1988
Chemist and National Safety and Loss Control Manager, AC Hatrick Chemicals Pty Ltd (now Nuplex)
Chemical industry

CONTACT INFORMATION
Victoria Sedwick
vsedwick@ramboll.com
+61 (2) 99548100
Ramboll Environ
Level 3, 100 Pacific Highway,
(PO Box 560)
North Sydney 2060
NSW, Australia
EDUCATION
1985-1988
Master of Engineering Science
University of New South Wales, Sydney, Australia
1974-1978
Bachelor of Applied Science, Chemistry
University of Technology, Sydney, Australia

COURSES/CERTIFICATIONS
Certified as a Lead Environmental Auditor with Exemplar Global (certificate 13180)

PROJECTS

2017
Environmental Compliance Review of a Waste Facility in New South Wales
Addisons, Australia
Project director
Compliance review to support a green waste business following action by NSW EPA for water issues. Provision of additional advice in relation to water and wastewater management at the facility.

2017
Environmental Health and safety Due Diligence Review of mining equipment manufacturing facilities in Western Australia and New South Wales
Project director and Reviewer
Desk top review of documents including VEDD Phase 1 ESA report prior to acquisition of the business and sites.

2017
Vendor Environmental Due Diligence Review of automotive manufacturing facilities in Adelaide and Melbourne, Australia
Confidential client
Project director
VEDD Phase 1 ESA and Limited Environmental Compliance Reviews of two facilities in South Australia and peer review of the report for the Victoria facility prior to sale of business.

2017
Detailed Site Investigations of former concrete pipe manufacturing facility in Perth, Western Australia
Henry Davis York, Australia
Project director
Detailed site investigations including Phase I ESA prior to site closure and ongoing soil and groundwater investigations for classification under the Contaminated Sites Act and for documentation prior to sale of the site.

2017
Environmental Health and safety Due Diligence Review of steel manufacturing facilities in Western Australia, Queensland and New South Wales
Project director
Desk top review of documents including VEDD Phase 1 ESA report prior to acquisition of the business and sites.
2017
**Environmental Compliance Review of a Waste Facility**
Confidential client
**Auditor**
Compliance review to support the business potentially reviewing the ownership options for its Australian facility. Compliance issues related to chemical storage, waste water management and hazardous wastes.

2017
**Detailed Site Investigations of manufacturing facility in Melbourne, Victoria**
*Henry Davis York, Australia*
**Project director**
Detailed site investigations including soil and groundwater sampling programs in preparation for S53X Site Audit which is required when land is proposed for future change in use is potentially contaminated.

2016
**Independent Environmental Audits and Hazard Audits for Planning Approvals**
*Australia*
**Project Director and Peer Reviewer**
Oversight and peer review of the independent environmental audit and hazard audit of the Redox chemical storage, facility.

2016
**Independent Environmental Audit**
*Veolia Australia and New Zealand*
**Project Director and Peer Reviewer**
Compliance Audit of the Woodlawn Bioreactor and Crisps Creek Intermodal as required under development consent and Environment Protection Licence conditions.

2016
**Independent Environmental Audit**
*Veolia Australia and New Zealand*
**Project Director and Lead Auditor**
Compliance Audit of the Banksmeadow Transfer Terminal as required under project approval and Environment Protection Licence conditions.

2016
**Independent Environmental Audit**
*Veolia Australia and New Zealand*
**Project Director and Lead Auditor**
Compliance Audit of the Clyde Transfer Terminal as required under development consent and Environment Protection Licence conditions.

2016
**Independent Environmental Audit**
*Viva Energy, Australia*
**Project Director and Lead Auditor**
Compliance Audit of Refinery Conversion following closure of old Shell Clyde refinery and conversion to a terminal as required under development consent conditions.

2016
**Independent Environmental Audit of Morgan Cement facility at Port Kembla**
*Adelaide Brighton Cement, Australia*
**Project Director**
Compliance Audit required by NSW EPA as a licence condition following dust complaints.
2016
Vendor Environmental Due Diligence Review of sinkware manufacturing facility in Adelaide
Addisons, Australia
Project director
Exit audit and VEDD Phase 1 ESA report prior to sale of business and site

2016
Project Olympus Environmental Due Diligence
Confidential client, Australia, New Zealand
Regional lead and auditor
Regional lead for EDD of various industrial chemical manufacturing facilities

2016
Property Due Diligence of Western Australian site
Fletcher Building, Australia
Project Director
Phase 1 and Phase 2 Environmental Site Assessment focused on aboveground and underground storage tanks and hydrocarbon contamination.

2016
Project Endeavour
Confidential, Australia
Project Manager
Environmental Social and Governance due diligence review and advice regards compliance of two coal mines and one coal project in central Queensland.

2016
Exit Audits of Queensland facilities
ESCO Corporation, Australia
Project Director and auditor at Mackay
Conducted environmental reviews as part of the exit audits for mining equipment facilities in Kingaroy and Mackay, Queensland

2016
Project Thorn
Confidential Consortium, Australia
Project Director
Preliminary Stage 1 EDD for the Port of Melbourne lease

2015-2016
Independent Environmental Audit of power station at Wagga Wagga
Origin Energy, Australia
Project Director
Compliance audit required by NSW Department of Planning and Environment as part of Project Approval

2015-2016
Limited Assurance of emissions for New Zealand Emissions Trading Scheme and CDP
Confidential Building Products manufacturer, New Zealand, Australia
Project Director
Limited Assurance of selected facilities for the NZ ETS and the company's CDP.
2015-2016
Project Bell
Confidential Consortium, Australia
Project Director
EDD for transaction acquiring an Australian national rail business.

2015-2016
EHS Compliance Audits
Confidential Building Products Manufacturer, Australia, Spain, Taiwan, Province of China, United States, New Zealand, United Kingdom
Project Director
EHS Compliance Audits of various building products manufacturing sites and construction projects against corporate standards and local regulations.

2015
Property Refinancing Due Diligence
Australia, New Zealand
Project Director and Auditor
Managed the due diligence investigations for the divestment of a cold storage logistics business in Australia, New Zealand and the US.

2015 - 2016
Property Baseline Environmental Assessments
Queensland, NSW and Victoria, Australia
Project Director and Peer Reviewer
Managed and reviewed the baseline contamination investigations for the logistics facilities for a business at part sites in Queensland, NSW and Victoria Australia.

2015
EHS Compliance Audits
Johnson & Johnson, Australia
Project Director and auditor
EHS compliance audits of J&J Medical facilities in each state of Australia against corporate standards and local EHS regulations.

2015
Bankstown Airport redevelopment
Bankstown Airport Limited, Australia
Project Director
Provided advice in relation to vapour intrusion from chlorinated solvent groundwater contamination.

2015
Port Transaction EDD
Confidential Client, Australia
Project Director
Environmental due diligence of the Port of Darwin, NT.

2015
Marrickville Metro Compliance Audit and Contamination Advice
AMP Capital, Australia
Project Director
Compliance audit of a centre tenant, drycleaners and advice re chlorinated solvent contamination.
2015
Foray St Yennora EDD
St Hilliers, Australia
Project Director
Provided advice in relation to chlorinated solvent contamination and remediation requirements prior to potential purchase.

2015
Independent Environmental Audits and Hazard Audit for Planning Approvals
Australia
Lead Auditor/Peer Reviewer
The independent environmental audit and hazard audit for an ammonium nitrate storage.

2015
Property Due Diligence of Waterloo site
Fletcher Building, Australia
Project Director
Phase 1 Environmental Site Assessment and vapour intrusion investigation for underground storage tank and chlorinated solvent contamination.

2014-2015
EDD of wind farms
Confidential investor, Australia
Peer reviewer
Environmental due diligence of several major Australian wind farm developments.

2014
Port Transaction EDD
Investment consortium, Australia
Project Director
Environmental due diligence of Newcastle Port.

2014
Due Diligence of chemicals business in Australia and New Zealand
Chinese Chemical Manufacturer, Australia, New Zealand
Project Director
Due diligence reviews and site visits. Assessment of legacy liabilities and compliance costs.

2013-2014
Mergers and Acquisitions / Due Diligence
Australia
Project Manager
Environmental liabilities review in the due diligence for the acquisition of a major downstream petroleum business with refining, distribution and retail facilities in Australia for a confidential consortium.

2013
EDD for port privatization
Investment consortium, Australia
Project Director
Environmental due diligence of two major Australian ports - Port Botany and Port Kembla. The due diligence included reviewing the gap analysis against Equator Principles for the lenders.
2013
**Mergers and Acquisitions / Due Diligence**  
*Australia*  
**Peer reviewer**  
Environmental, health and safety due diligence for the acquisition of an Australian forge business, an Australian rail products company and other manufacturers for confidential US clients.

2013
**Mergers and Acquisitions / Due Diligence**  
*Australia*  
**Project Director**  
Environmental due diligence review for the investment in a marine terminals business with locations in South America, UK, Turkey, the US and Asia.

2012
**EDD of Desalination Plant privatization transaction**  
*Confidential consortium, Australia*  
**Project Director**  
Environmental due diligence of a desalination plant assessing planning approvals, environmental impact on marine environment and legacy land contamination.

2012
**Project Trident**  
*Transport for NSW, Australia*  
**Auditor**  
Review of three rail construction and upgrade projects prior to project handover from RailCorp

2011-2013
**Independent Environmental Audits and Hazard Audits for Planning Approvals**  
*Australia*  
**Auditor/Peer Reviewer**  
The preparation of independent environmental audit and hazard audits for several organisations in chemical storage, brewery, concrete tile manufacturer, and chemical logistics.

2011-2012
**Contaminated Site Assessment and Due Diligence**  
*Australia*  
**Auditor**  
Managed and conducted several site assessments for food manufacturing companies.

2010-2015
**Environmental audit program**  
*Thailand*  
**Project Director and Peer Review**  
Annual audit program for a gold mine that reviews compliance against planning approvals and codes

2010-2013
**Mergers and Acquisitions / Due Diligence**  
*Australia*  
**Project Director**  
Environmental health and safety due diligence including remediation and regulatory advice for the closure of an aerospace manufacturing facility located on Commonwealth land in Australia.
2010-2013  
**Contaminated Site Assessment**  
Australia  
Peer Reviewer  
Baseline contamination study for Port of Brisbane

2010  
**Environmental due diligence**  
Confidential private equity client, Australia  
**Project Director**  
Environmental and carbon liabilities due diligence for the acquisition of a glass manufacturing and plastics manufacturing business

2010  
**Mergers and Acquisitions / Due Diligence**  
Australia  
**Auditor**  
Due diligence for a battery manufacturer.

2009-2014  
**Due Diligence and Contaminated Site Assessment**  
Australia  
**Project Manager**  
Phase me and II site assessments of various acquisitions for earthmoving and mining equipment, rail products and water treatment facilities.

2009-2013  
**Environmental Due Diligence**  
Australia  
**Project Director**  
Managed due diligence investigations of several major aerospace manufacturing facilities for three US aerospace companies and an Australian manufacturer

2009-2013  
**Pharmaceutical EDD**  
Australia  
**Auditor**  
Environmental due diligence and contamination assessments for the acquisition of pharmaceutical manufacturing facilities

2009-2010  
**EDD and carbon liabilities**  
Australia  
**Project Director**  
Environmental, health and safety liabilities and carbon liabilities due diligence for the acquisition of coal haulage businesses in Australia for a confidential client.

2009-2010  
**Litigation**  
Australia  
**Expert Witness**  
Environmental compliance and air emissions matter in the NSW Land and Environment Court.
2009-2010
**Due Diligence and Compliance**
**Australia**
**Project Manager**
Environmental due diligence for the bitumen manufacturing facilities and follow on compliance audits

2009-2010
**Environmental Due Diligence**
**Australia**
**Project Director**
Environmental and carbon liabilities due diligence for the acquisition of lead smelter for confidential client

2009
**EDD for an investment in an Australian and New Zealand Waste business**
**Private equity - confidential, Australia**
**Project Director**
Environmental and carbon liabilities due diligence of a large solid and liquid waste business.

2009
**Due Diligence of a motorway for an investment fund**
**Confidential, Australia**
**Project Director**
Environmental due diligence of motorway.

2009
**EDD for a port privatization**
**Investment consortium, Australia**
**Project Director**
Environmental due diligence of the Port of Brisbane. The due diligence included gap analysis against Equator Principles for the lenders.

2008-2010
**Environmental Due Diligence**
**Australia, New Zealand**
**Project Director**
Due diligence investigations for acquisitions in the chemical, agrichemical, petroleum refining and retail operations and waste management industry for Australian investment firms, Australian and US private equity and Chinese manufacturers

2008-2009
**EDD**
**Australia**
**Project Director**
Environmental liabilities and due diligence for the acquisition of airports several airports - review of planning approvals and contaminated land.

2008-2009
**Mergers and Acquisitions / Due Diligence**
**Australia**
**Director**
Managed an environmental due diligence program involving compliance and contamination assessment for an aluminium extrusions business in all states of Australia.
2008-2009
**Environmental Due Diligence of pharmaceutical facilities**
**Australia**
**Project manager**
Environmental due diligence including Phase 1 and Phase 2 investigations for the acquisition of pharmaceutical manufacturing facilities for confidential clients.

2008
**Due Diligence of Airports**
**Confidential, Australia**
**Project Director and Auditor**
Environmental due diligence for the acquisition of several Australian airports in New South Wales and Queensland, Australia for confidential consortium.

2007-2016
**CEM Groundwater Contamination Remediation**
**Crane Enfield Metals, Australia**
**Project Director**
Long term advice and oversight role of remediation of chlorinated solvent contamination of groundwater using groundwater pump and treat, soil vapour extraction and investigation of enhanced bioremediation.

2007-2011
**Mergers and Acquisitions / Due Diligence**
**AGL, Australia**
**Project Director**
Environmental health and safety compliance and management systems reviews for due diligence prior to the acquisition of hydroelectric power, gas-fired cogeneration plants, coal seam gas processing plant and pipelines and wind farms in New South Wales, Queensland, Victoria and South Australia for several energy companies.

2006-2014
**Mergers and Acquisitions / Due Diligence**
**Australia, United States, Indonesia, Malaysia, Denmark, New Zealand, Belgium**
Environmental and occupational health and safety due diligence for the acquisitions of several building products businesses and foundry businesses.

2006-2014
**Due diligence and compliance audits of coal mining and minerals processing operations**
**Australia**
**Project Director and Reviewer**
Due diligence and compliance audits of coal mining and minerals processing operations.

2006-2008
**Contaminated land and planning due diligence**
**CUB, Australia**
**Project Manager**
Environmental due diligence prior to the closure and divestment of brewery.

2005-2011
**Mergers and Acquisitions / Due Diligence**
**Castle Harlan Australian Mezzanine Partners, Australia**
Environmental and health and safety due diligence of a variety of businesses in Australia including mine haulage, logistics, crane hire and wine makers prior to the acquisitions by a private equity client.
2005-2006
**Environmental Health and Safety Compliance Auditing and Environmental Management**
*Johnson and Johnson, Australia*
**Auditor**
Environmental health safety and social auditing.

2005
**EHS Due Diligence**
*BHP Billiton, South Africa*
**Auditor**
Environmental health and safety (EHS) and corporate social responsibility due diligence and financial risk modelling for mining and minerals processing facilities in South Africa for a large multinational mining and manufacturing company.

2004-2006
**Mergers and Acquisitions / Due Diligence**
*Australia*
**Advisor**
Environmental due diligence for the closure and divestment of a copper smelter in New South Wales, Australia.

2003
**Litigation**
*Australia*
**Expert Witness**
Environmental compliance and site/building contamination cases in the Federal Court.

2002-2013
**Environmental Management Systems**
*Australia, New Zealand*
**Auditor and trainer**
Assisted in the development, implementation and/or maintenance of environmental management systems (EMS) in line with ISO 14001 for divisions of a metal processing and plumbing supplies manufacturer and a pharmaceutical company.

2002-2010
**Mergers and Acquisitions / Due Diligence**
Environmental health and safety due diligence for acquisitions of a plastic pipe manufacturer, plumbing equipment manufacturers and metal processing businesses for a confidential client.

2000-2015
**Contaminated Site Assessment**
*Australia*
**Project manager**
Conducted site assessments for a specialty chemical manufacturer, phenolic resins manufacturer, industrial rubber manufacturing site and timber treatment plant.

2000-2012
**Health and Safety and Chemical Management**
*Australia, New Zealand*
**Auditor**
Conducted environmental health and safety audits of a wide range of facilities including chemical, logistics, construction, general manufacturing and tourism.
2000-2005  
**Contaminated Site Assessment**  
Australia  
**Auditor**  
Site contamination assessments for several Department of Defence sites.

2000-2005  
**Environmental Health and Safety Compliance Auditing and Environmental Management**  
Australia, New Zealand  
**Auditor and reviewer**  
Conducted environmental audits for a timber company with plantations, production plants and treatment plants.

1998-2015  
**Health and Safety Management**  
Australia  
**Presenter**  
Conducted and managed various occupational hygiene monitoring programs including large remediation sites which included public presentations and employee training sessions.

1998-2003  
**Health and Safety and Chemical Management**  
Australia, Philippines, New Zealand, Hong Kong  
**Trainer**  
Health and safety training sessions in Australia, New Zealand and the Philippines.

1998-1999  
**Environmental Due Diligence**  
Brazil, United Kingdom, Canada, United States  
**Project Director**  
Environmental due diligence review of global explosives manufacturing facilities prior to acquisition.

1998  
**Mergers and Acquisitions / Due Diligence**  
Australia, United Kingdom, New Zealand, China, Malaysia, Portugal, Chile, Brazil  
**Project Manager**  
Due diligence investigations for worldwide business involving food manufacturing and chemical storage facilities.

1996-1997  
**Environmental Health and Safety Compliance Auditing and Environmental Management**  
Snowy Hydro, Australia  
**Auditor and trainer**  
Managed environmental programs for two hydroelectric generators, which included compliance audits, training of internal auditors and development of their EMS.
ROSEBUD YU

Managing Consultant

Rosebud Yu has 19 years in environmental management, sustainability and engineering with specific experience in environmental due diligence, auditing and environmental management systems. More recently she has assisted organisations with climate risk assessments, preparing information for public reporting, provided assurance over sustainability and emissions reports and undertaken WHS compliance and management system reviews. She has managed environmental and sustainability projects for many large, high profile clients in a variety of industries in Australia and the UK. Her experience includes sectors such as oil and gas, minerals processing, food and drink, financial services, retail, power generation, aerospace and airline, transport, various manufacturing, property and service providers.

Rosebud is a certified lead environmental auditor with Exemplar Global for conducting environmental management, EMS, compliance and ISO14001:2015 audits.

EDUCATION

2000
MEng (Energy Planning & Policy)
University of Technology Sydney, Sydney

1990
BEng (Manufacturing/Chemical Engineering)
Swinburne Institute of Technology, Melbourne

COURSES/CERTIFICATIONS

Infrastructure Sustainability Accredited Professional, ISCA, 2015
Certified Lead Environmental Auditor, Exemplar Global, 2017
Auditor under NSW Energy Savings Scheme

PROJECTS

EHS Compliance
2016-17
Environmental Compliance & Hazard Audit - Redox Pty Ltd
Independent Environmental Audit and Hazard Audit of a chemical storage and distribution facility against the conditions of development consent as required by the NSW Department of Planning and Environment.

2016
EH&S Compliance Audit - printing facility
Conduct of an environment, health and safety compliance audit against relevant Victorian and NSW environmental and health & safety legislation for two operations located in Melbourne and Sydney. Key site activities

CONTACT INFORMATION
Rosebud Yu
ryu@ramboll.com
+61 (2) 99548100
Ramboll Australia Pty Ltd
Level 3, 100 Pacific Highway
PO Box 560
North Sydney NSW 2060
Australia
included printing of packaging material, carton folding, printing press production, and storage and distribution.

2016
**H&S Compliance Audit - rotating electrical equipment service centre**
An assessment of compliance against Queensland health and safety legislation, company safety standards and identification of potential issues for a service centre providing overhaul and repair of rotating electrical equipment and coil manufacture.

2016
**H&S Compliance Audit - steel product manufacturer**
An assessment of compliance against New Zealand health and safety (fixed plant & equipment and isolation) legislation, company safety standards and identification of potential issues for a steel reinforcing products manufacturer. The work included review of work practices against legislation and company procedures, and staff interviews across the organisation to identify non-compliance and areas for improvement.

2015
**H&S Compliance Audit - construction**
An assessment of compliance against relevant Fiji based health and safety (work at height) legislation, Company safety standard and identification of potential issues for a construction company developing a hotel resort in Nadi, Fiji. The work included interviews with labourers, contractors, and management to assess the adequacy of health and safety practices in place.

2015
**H&S Compliance Audit - global ink manufacturer**
An assessment of compliance against relevant state based health and safety legislation and identification of potential issues for a global ink manufacturer for facilities located in Sydney and Brisbane, Australia.

2014
**EMS Review**
Environmental management system gap analysis against ISO14001 standard for the Crocodile Gold Victorian operation (now Newmarket Gold).

2014
**Environmental Audit**
Review of site activities for compliance against relevant environmental legislation and preparation of an Environmental Condition Assessment Report as required under the lease conditions with Sydney Ports Corporation for a container logistics company (ACFS).

2013
**H&S Compliance Audit - NZ food & beverage manufacturer**
Health & safety compliance audit of a food & beverage flavors manufacturer in New Zealand against relevant health & safety legislation.

2013
**Environmental Compliance Audit - Redox Pty Ltd**
Independent Environmental Audit of a chemical storage and distribution facility against the conditions of development consent as required by the NSW Department of Planning and Infrastructure.
2012
**H&S Compliance Auditing – Secondment to financial institution**
Secondment to JP Morgan Chase to review compliance against the new harmonised Work Health and Safety Act 2011 including developing and implementing a remedial action plan, the systems and processes to ensure compliance. The work included interviews with heads of departments across the organisation to understand cultural practices and identify opportunities for improvement.

2011-2012
**Environmental Compliance Audit - Coal seam gas producer**
Review of internal systems and controls for maintaining compliance with environmental license requirements for a Queensland coal seam gas producer. A further review of the organisation’s strategic and operational readiness and control systems to meet the obligations of the new Clean Energy Act 2011.

2011-2012
**OHS & Quality Management System Audits - SunRice**
OHS and quality audit against AS/NZ4801 and ISO9001 management systems for the production facilities of an Australian rice food company.

2010
**Environmental Management Audit - Transport Authority**
Environmental management audit for a Western Australia transport authority focusing on contamination and land management.

2010
**Environmental Management Audit - Transport Authority**
Environmental management audit against ISO14001 for a New South Wales transport authority for the state-wide operations including Sydney and Newcastle buses and Newcastle ferries.

2012
**Environmental Management – Secondment to Coal seam gas producer**
Secondment to a Queensland coal seam gas producer to develop an environmental risk register for the construction and operation of downstream and upstream activities.

2009
**Environmental Management Audit - Envestra and APA Group**
Environmental management audit of the major subcontractor operating and maintaining the gas distribution network of a natural gas distribution company in Australia. The work involved review of the quality and integrity of data management systems, processes and internal controls.

1999-2000
**Environmental Compliance Audit - Building products manufacturer**
Environmental compliance audits of various facilities of a plastic and metal pipe manufacturer in NSW.

1998-1999
**Environmental Compliance Audit - Major food manufacturer**
National environmental compliance audits of the manufacturing and warehousing facilities of a major Australian food manufacturer against environmental licences and permits.

1998
**Environmental Compliance Audit - Various manufacturing businesses**
Assisted various manufacturing organisations with compliance against dangerous goods storage requirements.
1998
Environmental Compliance Audit - Department of Defence
Environmental compliance audits of Defence facilities.

EHS Due Diligence
2017
Environmental Due Diligence - automotive facility
Conduct of environmental due diligence of an automotive car trim and seat manufacturing company in Melbourne for an industrial client.

2017
Environmental Due Diligence - industrial client
Environmental due diligence for the sale of property used for electrical product manufacture.

2017
Environmental Due Diligence - office supplies facility
Environmental due diligence of OfficeMax, an office supplies warehouse and distributor, for loan refinancing.

2016
Environmental Due Diligence - industrial facility
Conduct of a Phase 1 Environmental Site Assessment of an industrial property used for logistics and geotechnical equipment storage and repair, to identify contamination liabilities prior to acquisition.

2016
Environmental Due Diligence – Acquisition of fuel business
Environmental due diligence audit for the potential acquisition of the national portfolio of Woolworths fuel business including review of environmental management, regulatory compliance and sustainability liabilities.

2016
Environmental Due Diligence – Acquisition of a foundry
Environmental due diligence audit for the potential acquisition of the national Australian operations of a global heavy engineering company manufacturing machined cast iron and steel products.

2016
ESG Due Diligence – Acquisition of a coal mining business
Environmental, social and governance due diligence audit for the acquisition of an Australian coal mining business including identification of ESG liabilities through an ESG screen of the level of awareness and management of ESG matters in operations and the supply chain.

2014
Environmental Due Diligence - global chemical company
Environmental due diligence for the acquisition of a global chemical company with operations in Australia, New Zealand and North and South America. Work included liability assessment associated with contamination, regulatory compliance and environmental management.

2014
Environmental Due Diligence - global chemical company
Environmental due diligence for a private equity client for the acquisition of a global chemical company (Cheminova) manufacturing agricultural products. The work included review of contamination and regulatory compliance risks.
2013-2014
**Environmental Due Diligence - Investor group acquisitions of Port operations**
Environmental due diligence for the acquisition of Port Botany and Port Kembla operations including tenant occupied facilities for a consortium of investors. Work included identifying liabilities through management interviews and review of environmental site assessments, climate risk assessment and impact studies for all Port sites prepared by the state government’s environmental consultants.

2013
**Environmental Due Diligence - Corporate acquisition of a water systems manufacturer**
Environmental, health & safety due diligence for the acquisition of a water systems manufacturer for a global water technology company including assessment of contaminated land liabilities and compliance against legislative requirements.

2013
**Environmental Due Diligence - Corporate acquisition of building products manufacturer**
Due diligence for the acquisition of a laminated panel manufacturer by a building products company including compliance review against planning requirements.

2013
**Environmental Due Diligence - Corporate acquisition of a steel coil manufacturer**
Environmental due diligence for the acquisition of a painted steel coil manufacturing business for a New Zealand building products company including review of compliance against environmental licences, permits and development consent conditions and the extent of environmental management.

2004-2005
**Environmental Due Diligence - IPO of a global petrochemical business**
Environmental due diligence for the IPO of 22 global petrochemical facilities of a major oil & gas company involving technical liaison between the financial due diligence team, environmental consultancy and client.

2003
**Environmental Due Diligence**
Environmental due diligence for the acquisition of a major Russian oil and gas business by a major global oil & gas company.

2011
**Environmental Due Diligence - Private equity acquisition of an air conditioning business**
Carbon due diligence for a private equity firm acquisition of a refrigerant/air conditioning business in relation to potential emissions trading system liabilities and financial impacts.

2002-2005
**Environmental Due Diligence - UK and Europe**
Several environmental due diligence investigations for acquisition, divestment and IPOs of businesses in the UK and Europe for corporate, financial services, private equity and legal firms. Sectors have included oil & gas, power generation, plastic and metals manufacturing, engineering, automotive, electronics, textile and marine.

**Sustainability & Carbon Management & Audit**
2016
**City-wide GHG Assessment**
Preparation of a high level city-wide GHG emissions inventory for six Asian cities as part of a low carbon, climate resilient urban infrastructure project for the Asian Development Bank.
2015 - 2016

**Climate Risk Assessment and Green Star Climate Adaptation Plans**

Conducted a climate risk assessment for a national property developer to understand the level of exposure to future climate conditions for the company’s national property portfolio. In addition, climate adaptation plans for several developments were prepared under the Green Building Council’s Green Star rating system, which included working with various parties involved in the design and construction of the developments.

2015 - 2016

**Greenhouse Gas Emissions Assurance – NZ ETS**

Assurance over production and greenhouse gas emissions data reported under the New Zealand Emissions Trading Scheme for a global building products manufacturer for their cement, steel making, insulation and laminated board production facilities.

2015

**Greenhouse Gas Emissions Assurance – CDP**

Assurance over the total Group greenhouse gas emissions data reported for the Climate Change Information Report (CDP) for a global building products manufacturer. Work included review of data management systems, internal controls, calculation methodologies and performing recalculations.

2015

**Transport Sustainable Design Guideline Assessment - TfNSW**

An assessment of compliance with a NSW Government Transport agency’s Sustainable Design Guidelines by selected transport project teams. The assessment included assessment of five multi-sized projects comprising large, multi-asset projects through to small car park upgrades at railway stations, with the aim of identifying improvements to systems, processes and the guidelines.

2015

**Greenhouse Gas Assessment – Hydro Aluminium Kurri Kurri**

Preparation of a greenhouse gas assessment for the demolition and remediation of a former aluminium smelter in NSW, as part of the Environmental Impact Statement. The work involved identifying all key activities associated with the demolition and remediation works, calculating the associated scope 1, 2 and 3 GHG emissions generated by these activities and identifying GHG mitigation measures for the project. The GHG assessment was undertaken in accordance with the Greenhouse Gas Protocol and the NGER Determination and Technical Guidelines.

2014

**Audit of energy efficiency schemes**

Independent audit of ERM Power Retail’s compliance with the NSW Energy Savings Scheme (ESS), Victorian Energy Efficiency Target (VEET) scheme and the national GreenPower program.

2015-2014

**Emissions Reporting**

Data collation and preparation of an energy and emissions report for submission under the National Greenhouse and Energy Reporting (NGER) Act 2007 for the Australian operations of an international supermarket retailer for 2014 and 2015 reporting. The work included preparation of data for the online NGER submission and analysis of data for internal reporting.

2012

**Emissions Assessment and Funding Assurance**

Assurance to a federal government agency (the then DCCEE) in relation to the assessment and calculation by the department of Energy Security Fund Cash Payments to assist highly emissions-intensive coal-fired generators.
2011
**Carbon Impact Assessments**
Assessed the carbon price impacts within the supply chain of the Australian operations of a global nutrition and health-related consumer goods company and an engineering and infrastructure management services provider. Work included calculation of GHG emissions associated with site level activities and within the supply chain.

2011
**H&S Compliance Audit - Grain producer**
Audit of the data collection and reporting processes of a global grain producer for the reporting of All Injury Frequency Rate (AIFR) prior to public reporting.

2011
**Sustainability Assessment**
Preparation of an assessment tool for The Climate Institute to assist in the assessment of potential corporate partners incorporating ESG and other sustainability framework concepts into the assessment.

2011
**Corporate Reporting Review - a Big 4 Australian bank**
Reviewed a major Australian bank’s sustainability reporting against the requirements of the GRI’s (GRI3) sustainability reporting guidelines to assess compliance and identify future reporting opportunities. This included a gap analysis to identify KPIs not reported and interviews with personnel across various functions to understand data availability and quality, and reporting opportunities.

2010-2012
**Corporate Reporting Assistance**
Assisted organisations with the development of data management and reporting systems and internal controls for public reporting of sustainability performance data based on best practice reporting frameworks. Clients included financial institutions, retail and service providers.

2010-2012
**Sustainability and Emissions Report Assurance - Various organisations**
Sustainability assurance over performance indicators and information reported within sustainability reports (against AA1000APS, GRI, National Greenhouse & Energy Reporting (NGER) Act or Energy Efficiency Opportunities (EEO) Act) for various organisations in Australia. These included financial institutions (Westpac, CBA), airlines (Virgin Airlines), property developers (Investa), retail (David Jones) and service providers (AMTA/ MobileMuster).

2010-2011
**Water Footprinting and Risk Assessment - Wine & beer producer**
Conducted a water footprint and water supply risk assessment for production operations and the downstream and upstream supply chain for the Australian and New Zealand operations of a wine and beer producer.

2010
**Emissions Reporting Assurance - Minerals processing businesses**
Carbon emissions assurance over data reported to the Australian federal government for Emissions Intensive Trade Exposed (EITE) assistance for minerals processing companies (Nyrstar Port Pirie, BHP Temco).

2010
**Sustainability Assessment**
Review of a major Australian banks’ effectiveness in implementing the ESG risk management policy and framework within the business including Group Risk, Institutional Banking and Wealth Management operations.
DAVID FORD

Senior Managing Consultant

David is a chemical engineer with prior experience working as a brewer, environmental manager, project manager and finance manager. His experience includes vendor and acquisition due diligence; environment, health and safety (EHS) management systems; EHS compliance auditing; contamination assessment; materials, energy and water usage efficiency; waste management and reporting; and corporate governance. David assists a range of industrial and commercial clients providing advice on contamination, environmental and health and safety compliance, hazardous substance and waste classification and disposal requirements. He undertakes due diligence and compliance reviews for clients looking to acquire or divest assets across a wide range of industry sectors. David has experience in major project approvals, site investigation projects and site closures and remediation.

CAREER

2018-present
Senior Managing Consultant, Ramboll

2012-2018
Consultant/Manager, Ramboll (formerly Ramboll Environ)

2010-2011
Project Manager – Commercial Finance, Foster’s Group

2007-2010
Commercial Finance Manager – Woolworths, Foster’s Group

2005-2007
Project Manager - CUB Site, Sydney, Foster’s Group

1996-2005
Environment Coordinator, Foster’s Group

1984-1995
Brewer - Melbourne, Brisbane, Canada, Sydney, Foster’s Group

EDUCATION

1998-1999
Grad Dip Business Administration
University of Technology, Sydney, Sydney, Australia

1980-1983
BEng (Hons), Chemical Engineering
University of Melbourne, Melbourne, Australia

CONTACT INFORMATION

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Australia
EHS COMPLIANCE AUDIT EXAMPLES

2018
**Waste Facility with Electricity Generation**
Independent Environmental Audit of Veolia’s Woodlawn bioreactor and intermodal facilities against the conditions of the development consents and Environmental Protection Licences. The bioreactor utilises landfill gas for the generation of electricity.

2018
**Electrical Equipment**
Health and safety compliance audit of an electrical equipment service facility in Newcastle as part of a global audit program.

2018
**Mining Equipment**
Peer review of an environmental compliance audits of a mining equipment service and maintenance facility in Tasmania as part of a global audit program.

2018
**Bulk Liquids Terminal**
Audit of secondary containment and spill prevention measures at a NSW bulk liquids terminal.

2017
**Brake Components**
Environmental, health and safety compliance audit of a brake component manufacturer in Victoria as part of a global audit program.

2017
**Electrical Equipment**
Health and safety compliance audit of an electrical equipment service facility in Sydney as part of a global audit program.

2017
**Vehicle Components**
Environmental, health and safety compliance audit of a vehicle component manufacturer in Victoria.

2017
**Waste Transfer Terminal**
Independent Environmental Audit of Veolia’s Clyde (NSW) waste transfer terminal against the conditions of the facility’s development consent and Environmental Protection Licence.

2016
**Refinery Conversion**
Independent Environmental Audit of conversion of a refinery to a fuel terminal against the requirements of the conditions of the development consent and Environmental Protection Licence.

2016
**Cement Works**
Independent Environmental Audit of a cement works to meet the requirements of the conditions of the facility’s Environmental Protection Licence.

2016
**Waste Transfer Terminal**
Independent Environmental Audit of a waste transfer terminal against the conditions of the facility's development consent and Environmental Protection Licence.
2016
Vehicle Components
Environmental, health and safety compliance audit of a truck component manufacturer in Victoria as part of a global audit program.

2015
Construction Industry - Work at Heights
Health and safety audit of a construction site in New Zealand with a focus on work at heights.

2015
Construction Industry
Environmental compliance audit of a construction industry supplier in Queensland.

2014
Construction Industry
Environmental compliance audit of a construction industry supplier in New Zealand.

2014
Aggregates Quarry
Environmental compliance audit of an aggregates quarry in New Zealand.

2014
Major Hazard Facilities
Independent Environmental Audits of two dangerous goods warehouses (Major Hazard Facilities) in Sydney’s western suburbs to meet the requirements of the conditions of the development consents.

2013
Vehicle Manufacturer
Environmental, health and safety compliance audits of a truck component manufacturer in Queensland as part of a global audit program.

2013
Vehicle Manufacturer
Environmental, health and safety compliance audit of a mobile crane manufacturer in Queensland.

2013
Food Industry
Environmental, health and safety compliance audit of a food industry supplier in New Zealand.

2012
Transport Projects
Environmental audit of three rail transport projects for a state government authority.

2012
Poultry Processing Facilities
Five environmental compliance audits of poultry processing, rendering and feed mill facilities located in New South Wales and Queensland.
EMILY ROWE

Managing Consultant

Emily Rowe is an Environment, Health and Safety (EHS) Specialist with over 20 years of experience in consulting and petrochemical industries. She is experienced in conducting EHS audits for regulatory compliance, contamination liability and due diligence purposes. She is experienced in implementing and auditing Environmental Management Systems (EMS) including ISO 14001 Certification for Caltex Kurnell Refineries’ EMS. Emily is highly skilled in regulatory reporting including compliance tracking of development consents; EHS auditing; hazardous chemical management; remediation monitoring; and waste management.

EDUCATION
2014
Graduate Certificate of Sustainability
University of New England, Australia

1991
B Engineering (Chemical)
University of Sydney, Australia

COURSES/CERTIFICATIONS
National WHS General Construction Induction Training, 7 January 2015
ISO 9001 Appreciation and Interpretation Training Course and Internal QMS Auditor Training Course, Lloyds Register, 2013
Environmental Management System Auditing, ANDSAM, 2011
Lead Auditor Course in Environmental Management System, ETRS, 2004

PROJECTS
EHS Audits (URS Australia Pty Ltd)
1992 - 2007
Conducted numerous EHS audits for compliance, contamination liability, EMS and due diligence purposes for a range of industrial facilities including:

- Five Sydney Ports Corporation facilities, including the Emergency Response Services and Bulk Liquids Berth;
- Sydney Airport and the Sydney Basin Airports (Bankstown Airport, Camden Airport and Hoxton Park Airport);
- Defence facilities including Richmond, Moorebank, Albatross and Chowder Bay; and
- Chemical manufacturing sites.

CONTACT INFORMATION
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Australia
Environmental Management (URS Australia Pty Ltd)
2001 – 2007
Emily was seconded to a number of clients to provide environmental management services largely related to preparation of regulatory reports including:

- Master Planning and Environment Department for Sydney Airport Corporation Limited to prepare the 2000- 2001 Annual Environmental Report, reviewing environmental impact assessment and contaminated site investigation reports, preparing tender briefs, updating a contaminated sites database, preparing EMS procedures and liaising with Airport Environment Officers.
- BHBB Cross City Tunnel Joint Venture to prepare two Six Monthly Environmental Performance Reports.
- Caltex Kurnell Refineries to implement the Major Project Development Consent Conditions for the Caltex Clean Fuels Project.

Environmental Management (Caltex Refineries (NSW) Pty Ltd)
2007 - 2015
Emily worked as a member of Kurnell Refineries’ Environmental Protection Group. She had numerous responsibilities related to the implementation of various Major Project Consent Conditions for the Caltex Clean Fuels Project, which were incorporated into the Environment Protection Licence Pollution Studies and Reduction Programs. Some of the projects included:

- Preparation of an Operations Environmental Management Plan, Clean Fuels Project;
- A number of air emission studies and programs relating to point source hydrogen sulphide, sulphur dioxide, nitrogen oxides and particulates emissions, as well fugitive emission of volatile organic compounds and benzene, including determination and negotiation with the EPA of new air emission Licence Limits;
- Noise mitigation program; and
- Odour mitigation program.

She was responsible for Kurnell Refineries’ Governance and Regulatory reports including:

- Annual Return;
- National Pollutant Inventory report;
- Environment Protection Licence Monitoring Data on Caltex Public website;
- Dangerous Goods Notifications to WorkCover;
- Review and revision of Major Hazard Facility Safety Report;
- Preparing or reviewing, as required, Environmental Impact Statements and Construction or Operational Environmental Management Plans.

She also project managed environmental monitoring programs to schedule and budget with no contractor injuries including:

- Stack testing program;
- Groundwater monitoring program;
- Installation and monitoring of a Jet Fuel Remediation System;
- Odour Audit Program that involved community participation; and
- Community Groundwater Survey of 40 residential properties in Kurnell.
Environmental Due Diligence (Ramboll Australia Pty Ltd)
2018

Due Diligence Environmental Compliance Audit and Contamination Review –
Conduct an environmental due diligence review for the sale of aviation parts distributor and maintenance facility in Brisbane which included a review of contamination liabilities and regulatory compliance.

Site Audit in Sydney –
Assist the Site Auditor on a large and complex site in Sydney with review of data and data management.
APPENDIX C
INDEPENDENT AUDIT DECLARATION FORM
INDEPENDENT AUDIT DECLARATION FORM

Project Name: Ultimo Public School
Consent Number: SSD 7503
Description of Project: Construction and operation of Ultimo Pyrmont Public School
Project Address: 47-53 Jones Street, Ultimo, NSW
Proponent: Department of Education
Title of Audit: First Independent Environment Audit
Date: 11 March 2019

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

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

Notes:

a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information 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 Lead Auditor: Victoria Sedwick
Signature: 
Qualification: Exemplar Global Lead Auditor Accreditation No.13180
Company: Ramboll Australia Pty Ltd
Company Address: PO Box 560, North Sydney NSW 2060
APPENDIX D
SITE INSPECTION PHOTOGRAPHS
Photo 1: Jones Street hoarding and tree protection measures, looking north.

Photo 2: Quarry Street hoarding and tree protection measures, looking west.
Photo 3: Construction signage at Quarry Street gate.

Photo 4: Western (Wattle Street) side of the site, looking south from pedestrian bridge.
Photo 5: Works zone and Wattle Street hoarding, looking south from pedestrian bridge.

Photo 6: Looking south west from middle level of the site towards Wattle Street gate.
Photo 7: Looking east from middle level of the site. Geofabric is part of capping under the remediation action plan.

Photo 8: Barricade around lifted kerb stones on Wattle Street, near Quarry Street.

Title: Independent Environmental Audit
Site: Ultimo Pyrmont Public School
Client: NSW Department of Education
Approved: VS
Project-No.: 318000619
Date: 8 Mar 2019