

Independent Environmental Audit

Construction of the new Wentworth Point High School (SSD-11802230)

24 March 2023
FINAL REPORT

Prepared for:

Department of Education - School Infrastructure NSW

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1 EXECUTIVE SUMMARY

The Department of Education (DoEd) - School Infrastructure NSW (SINSW) commissioned SNC-Lavalin Australasia to undertake an Independent Environmental Audit (IEA) for the construction of a new high school, Wentworth Point High School (the Project), formally known as Sydney Olympic Park new high school.

The audit was undertaken in accordance with Development Consent SSD-11802230 and Independent Audit Post Approval Requirements, DPIE, 2020 (IAPAR). This report presents the finding of the initial IEA, undertaken as part of an audit program in accordance with Table 3 of the IAPAR.

Construction for the Project commenced on 31 October 2022. Therefore, this audit covers the period from 31 October 2022 to 23 January 2023.

The Development Consent allows for the staged construction of a new high school at 7 Burroway Road, Wentworth Point. Stage 1 will provide for a Stream 5 high school catering for up to 850 students. Stage 2 will bring the school up to a Stream 9 school catering for up to 1,530 students. The project will comprise:

- > a six-storey building with two wings, one along the southern boundary and one along the eastern boundary.
- > a two-storey hall building (for sports and performance) is also proposed in the northern portion of the site.

Consultation with agencies

The Auditor consulted with Department of Planning and Environment (DPE) via email to seek input as required by Section 3.2 of the IAPAR. The Department did not require any additional matter to be included in the Audit. The Department did not request the Auditor consult more broadly.

Compliance with the Development Consent

Overall, the Project demonstrated substantial compliance with the Development Consent. The detailed assessment against each Condition of the Development Consent is provided in Appendix C, Table C1.

Six (6) non-compliances were identified however five (5) of the non-compliances, were attributable to management plans required by the Project, that did not meet the full requirements of their respective condition. Condition B13 required the Construction Environmental Management Plan (CEMP), which includes the sub-plans, to be submitted to the Certifier for approval. The plans were submitted to the Certifier however the CEMP was not approved. The Certifier advised that he was not qualified to approve the CEMP. This gap in the approval process for the CEMP led to avoidable omissions in the sub-plans, when compared to their respective conditions. In the case of the Construction Soil and Water Management sub-plan, only a limited Erosion and Sediment Control Plan was prepared, resulting in inadequate controls on site.

The proponent's representatives actively addressed some of the non-compliances prior to finalisation of the audit. Where this occurred, the original noncompliance (for transparency), together with the actions taken to close them out, has been documented. In total, four (4) non-compliances remained open. They relate to:

- > The following sub-plans were not consistent with the Approval:
 - Construction Waste Management Plan (Condition B17)
 - Construction Soil and Water Management Plan (Condition B18)
 - The Construction Flood Emergency Management Plan (Condition B19)

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- > The Erosion and Sediment Control Plan was out of date and the controls were observed to be incorrectly installed (Condition C8).

Two observations of concern were also raised where the auditor determined that the Project has substantively met the relevant requirement however an improvement opportunity has been identified to improve ongoing environmental performance or prevent future non-compliances. These relate to:

- > The sub-plans did not document details of consultation as outlined in Condition A10
- > The CEMP had not been approved by the Certifier (Condition B13).

Six (6) recommendations arising from the non-conformances and observations of concern are presented in Section 6 of this report.

Environmental performance

The environmental performance of the Project was assessed against the requirements of the Construction Environmental Management Plan (CEMP) and associated sub-plans. The detailed assessment against the CEMP and sub-plans is provided in Appendix C, Table C2.

Overall, the project demonstrated a high level of conformance against the CEMP and sub-plans. Areas in need of improved performance, where non-conformances were recorded against sub-plans, were mostly associated with soil and water management.

The audit also undertook a high-level assessment of the Project's actual impacts against the predicted impacts as detailed in the EIS (Section 9 – Risk assessment). This high-level assessment is provided in Section 5.3 of this report.

The aspects included in the assessment were transport and accessibility, noise and vibration, aboriginal cultural heritage, contamination, acid sulfate soils, sediment and erosion and social impact. The project generally demonstrated “*consistent*” or “*lower*” actual impact when compared to the EIS predicted impact. However, for *sediment and erosion*, the actual impacts were assessed as being higher on the basis that erosion and sediment controls on site were not effectively implemented.

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2 INTRODUCTION

2.1 BACKGROUND

The Department of Education (DoEd) - School Infrastructure NSW (SINSW) commissioned SNC-Lavalin Australasia to undertake an Independent Environmental Audit (IEA) for the construction of a new high school, Wentworth Point High School (the Project), formally known as Sydney Olympic Park new high school.

The audit was undertaken in accordance with Development Consent SSD-11802230 and Independent Audit Post Approval Requirements, DPIE, 2020 (IAPAR). This report presents the finding of the initial IEA, undertaken as part of an audit program in accordance with Table 3 of the IAPAR.

2.2 PLANNING

The Environmental Impact Statement (EIS) Sydney Olympic Park new high school was prepared by Mecone NSW Pty Limited on behalf of DoEd in September 2021 to accompany a State Significant Development Application (SSDA) for the new high school.

On 14 October 2022, Development Consent (SSD-11802230) was granted for the new high school now known as Wentworth Point High School (the Project).

2.3 PROJECT DESCRIPTION

The Development Consent allows for the construction of a new high school at 7 Burroway Road, Wentworth Point in two stages. Stage 1 will provide for a Stream 5 high school catering for up to 850 students. Stage 2 will bring the school up to a Stream 9 school catering for up to 1,530 students. The project will comprise:

- > a six-storey building with two wings, one along the southern boundary and one along the eastern boundary.
- > a two-storey hall building (for sports and performance) is also proposed in the northern portion of the site.

2.4 COMMENCEMENT OF CONSTRUCTION

Additional environmental investigations were completed on site as an early works package, between November 2021 and January 2022, to close data gaps identified in the environmental reports provided in the EIS. The resulting EPA approved RAP Addendum was then lodged on 1 March 2022 as part of the Response to Submissions report.

Construction started on the Project on 31 October 2022 with site establishment and remediation work.

At the time of the inspection, piling works to prepare the foundations of the buildings were progressing. This included bulk excavation, installation of retaining walls, lift pits and drainage pits.

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2.5 AUDIT TEAM

In accordance with Development Consent Condition C37, SINSW submitted the audit team detailed in Table 1 to DPE for approval, to undertake this initial IEA.

Table 1: Audit team

Role	Name	Contact Details	Qualifications & Experience
Lead Environmental Auditor	Maurice Pignatelli	M: 0407 493 176 E: maurice@optimenv.com.au	Bachelor of Engineering (Civil) Master of Engineering Science (Public Health) Registered Lead Environmental Auditor (Exemplar Global #110031) ISO14001:2015 - Transition Assessment (Exemplar Global # 2018-EGC-14001A-3791) Erosion and sediment control training (IECA approved) Maurice is a Principal environment and health and safety specialist with over 30 years' experience leading teams in sustainability and greenhouse gas assessments, environmental, health and safety and hazardous materials audits, management systems and plans. Maurice has extensive experience in statutory roles required by DPE such as Environmental Representative and Independent Auditor. He has expertise in the assessment of proponents and contractors and environmental impacts associated with State Significant Infrastructure (SSI) and Development (SSD) projects.

A copy of the DPE approval letter, dated 17 January 2023, is attached in Appendix A to this report.

2.6 AUDIT OBJECTIVES

The objectives of this IEA are to:

- > assess the environmental performance of the Project and whether it is complying with the requirements in the Approval (including the requirements of any approved strategy, plan or program)
- > review the adequacy of the approved strategies, plans and programs
- > to recommend any appropriate measures to improve environmental performance of the Project.

2.7 AUDIT SCOPE

The audit was undertaken in accordance with the requirements of the Development Consent and the IAPAR.

The Development Consent conditions that relate to the IEA are Conditions C36-C41, as detailed in Table 2. The requirements of IAPAR that relate to the scope of the audit are detailed in Table 3.

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Table 2 and Table 3 also provide reference on where the scope requirements have been addressed in this report.

Table 2: Scope requirements of the Development Consent

CoA	Scope requirement	Where addressed
C36.	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.	Section 2, Table 3.
C37.	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Section 2.5 Appendix A
C38.	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements, upon giving at least 4 week's notice (or timing) to the Applicant of the date upon which the audit must be commenced.	Section 2.8
C39.	In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must: (a) review and respond to each Independent Audit Report prepared under Condition C36 of this consent, or Condition C38 where notice is given by the Planning Secretary; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	Not triggered at the time of drafting this report.
C40.	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements unless otherwise agreed by the Planning Secretary.	Not triggered at the time of drafting this report.
C41.	Notwithstanding the requirements of the Independent Audit Post Approval Requirements, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.	Not triggered

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Table 3: Scope requirements IPAR

Scope requirement	Where addressed
Independent Audit PAR (DPIE, 2020)	This document
Development Consent (SSD 8873789)	Sections 4.1, 4.2, 4.3 Appendix C, Table C1
Post approval documents, including an assessment of the effective implementation of Environmental Management Plans and sub-plans	Appendix C, Table C2
Environmental performance including but not limited to:	
<ul style="list-style-type: none"> > Actual impacts compared with predicted impacts in the Environmental Impact Statement (EIS) 	Section 5.3
<ul style="list-style-type: none"> > Physical extent of the development in comparison with the approved boundary, and any potential off-site impacts 	Section 4.5 Section 5.2
<ul style="list-style-type: none"> > Incidents, non-compliances and complaints 	Section 4.6 Section 4.7 Section 4.8
<ul style="list-style-type: none"> > Performance of the development, with regard to agency policy and environmental issues identified during consultation when developing the scope of the audit 	Section 5.2 Appendix C, Table C2
<ul style="list-style-type: none"> > Feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project 	Section 3.5 Appendix D
A high-level assessment of whether Environmental Management Plans and sub-plans are adequate.	Section 5.1 Appendix C, Table C2

2.8 PERIOD COVERED BY AUDIT

The IEA program, timing, and frequency requirements for the Project, are detailed in Table 3 of the IAPAR, and reproduced in Table 4 below.

Table 4: Audit Frequency

Project Phase	Frequency	Ongoing Independent Audit Intervals
Construction	Within 12 weeks of the commencement of construction	At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.
Operation	Within 26 weeks of the commencement of operation	At intervals, no greater than 3 years or as otherwise agreed by the Secretary.
Closure / Rehabilitation	Within 52 weeks from notifying of suspension/ceasing of operations	At intervals no greater than 1 year or as otherwise agreed by the Secretary

Construction for the Project commenced on 31 October 2022.

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This IEA represents the initial independent audit for the Project. It therefore covers the period from 31 October 2022 to 23 January 2023.

This IEA (desk-top assessment) commenced on 17 January 2023. On this date, the auditor submitted the audit checklists to the proponent's representative requesting documentary evidence of compliance with applicable conditions of the Development Consent.

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3 AUDIT METHODOLOGY

3.1 DEVELOPMENT OF AUDIT SCOPE

This IEA focussed on Development Consent conditions applicable to works undertaken during the reporting period and will be revised in subsequent audits as the project works progress.

The audit scope was developed in consultation with the proponent's representatives to determine the applicability of Development Consent conditions to works undertaken during the reporting period. DPE was also consulted regarding areas of particular focus.

3.2 SUMMARY OF AUDIT PROCESSES

The audit process comprised the following:

- > Preliminary document review to enable the auditor to gain an understanding of the Project, environmental processes, and progress since project commencement.
- > Desktop assessment of publicly available documentation.
- > Preparation of audit checklist, with audit prompts for project details and requests for documentary evidence to determine compliance.
- > Provision of the audit checklists to proponent's representatives for collation of information, prior to interview.
- > Receipt of compliance information and assessment thereof, prior to interview.
- > Update the audit checklists with the new information and reframing of the audit questions to address outstanding information at the interview.
- > Opening meeting, interview and walk-through site inspection.
- > Consultation with DPE on areas of focus for the audit, and agencies to be consulted.
- > Further assessment of information collated.
- > Closing meeting via teleconference.
- > Preparation and issue of draft compliance tables, noting compliance status with CoA and any requests for further information.
- > Emails to resolve and seek clarification on outstanding matters.
- > Preparation and issue of draft audit report and compliance tables.
- > Finalisation and issue of audit report and compliance tables, following consideration of any comments received.

3.3 PROPONENT'S REPRESENTATIVES

The proponent's representatives for this project were:

- > Ernst and Young – Project Managers
- > RobertsCo - Principal Contractor

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The following personnel participated in the audit and responded to the auditor's requests for information:

- > Marco Amorelli – Ernst and Young - Project Manager
- > Zachary Ferris – Ernst and Young – Assistant Project Manager
- > Adam Greentree - RobertsCo – Project Manager

Each individual noted attended the audit opening and closing meetings and had the opportunity to provide evidence and input into the Project's compliance at different stages during the audit.

3.4 SITE INSPECTION

A walk-through site inspection was undertaken by the Auditor on 8 February 2023. During the site inspection, environmental controls on-site generally appeared to be operating effectively. A key focus for improvement, was erosion and sediment controls for the site. A noncompliance against Condition C8 - implementation of the CEMP and sub-plans, was triggered for erosion and sediment controls.

Refer to Appendix B for site photographs.

Refer to Appendix C, Table C2 for observations against the CEMP and sub-plans.

3.5 CONSULTATION WITH AGENCIES

The Auditor consulted with DPE via email on 9 February 2023 to seek input from DPE, as required by Section 3.2 of the Guideline, specifically in relation to:

- > Any particular area of focus for the audit
- > Any consultation with agencies deemed necessary by the Department.

On 27/2/23, DPE responded by email and advised that the Department does not require any additional matter to be included in the Audit. DPE did not request the Auditor to consult more broadly for the audit.

A copy of email correspondence is provided in Appendix D of this report.

3.6 COMPLIANCE DESCRIPTORS

The compliance status of each condition requirement was determined using the relevant descriptors in Table 5.

Table 5: Compliance descriptors

Status	Description
Compliant	Sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	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 was undertaken.

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4 AUDIT FINDINGS – TABLES

4.1 AUDIT FINDINGS SUMMARY

Table 6 summarises the audit findings. Further details on the findings can be found in the relevant section of the report.

Table 6: Audit findings summary

Description	Quantity	Section of Report where addressed
Assessment of Compliance		
Number of Conditions of Approval	174	Appendix C, Table C1
Compliant	41	Appendix C, Table C1
Non-compliant	9	Appendix C, Table C1 Section 4.3
Not triggered	124	Appendix C, Table C1
Recommendations identified during the audit	6	Section 4.4
Other		
Non compliances recorded (by the project) during the audit period	0	Section 4.6
Complaints reported during audit period	1	Section 4.7
Incidents recorded during the audit period	0	Section 4.8

4.2 COMPLIANCE

An assessment of compliance was undertaken against the Development Consent conditions applicable to works undertaken during the reporting period. Table 7 provides a summary of the assessment of compliance as per the schedules of the Development Consent. Compliance was assessed using the compliance status descriptors in Section 3.6 of this report.

Table 7: Assessment of compliance

SSD Requirement	No. of conditions	Findings		
		Compliant	Non-compliant	Not triggered
Schedule 2, Part A – Administrative controls	37	5	0	32
Schedule 2, Part B – Prior to commencement of construction	37	13	5	19
Schedule 2, Part C – During construction	43	26	1	16

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SSD Requirement	No. of conditions	Findings		
		Compliant	Non-compliant	Not triggered
Schedule 2, Part D – Prior to occupation or commencement of use	42	0	0	42
Schedule 2, Part E – Post occupation	15	0	0	15

Overall, the Project demonstrated substantial compliance with the Development Consent. The detailed assessment against each Condition of the Development Consent is provided in Appendix C, Table C1.

Nine (9) non-compliances were identified however seven (7) of the non-compliances, were attributable to management plans required by the Project, that did not meet the full requirements of their respective condition. Condition B13 required the CEMP (which includes the sub-plans) to be submitted to the Certifier for approval. The plans were submitted to the Certifier however the CEMP was not approved. The Certifier advised that he was not qualified to approve the CEMP.

This gap in the approval process for the CEMP led to avoidable omissions in most sub-plans, when compared to their respective conditions. In the case of the Construction Soil and Water Management sub-plan, only a limited Erosion and Sediment Control Plan was prepared, resulting in inadequate controls on site. Recommendation WPHS-01/ R-04 was raised to address this broad concern.

4.3 NON-COMPLIANCES

The non-compliances identified by this IEA are reported in this section, by exception.

It is noted that the proponent's representatives actively addressed some of the non-compliances prior to finalisation of the audit. Where this occurred, the original noncompliance (for transparency), together with the actions taken to close them out, have been reported in this section.

In total, four (4) non-compliances remain open, as detailed in Table 8.

Table 8: Summary of non-compliances

ID	Requirement	Non-compliance
WPHS-01 NC-01	Condition B5 Prior to the commencement of demolition, removal of buildings or construction (whichever occurs first), the Applicant must:... (c) submit a copy of the dilapidation report to the Planning Secretary, Certifier and Council	A copy of the precondition dilapidation report had not been submitted to the Certifier. <i>Prior to finalisation of this audit, a copy of the precondition dilapidation report has been submitted to the Certifier.</i> <i>This non-compliance has been CLOSED.</i>

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ID	Requirement	Non-compliance
WPHS-01 NC-02	Condition B16 The Construction Noise and Vibration Management sub-plan must address, but not be limited to, the following: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced noise expert; (d) include strategies that have been developed with the community for managing high noise generating works; (e) describe the community consultation undertaken to develop the strategies in Condition B16(d); 	The CNVMP did not include: <ul style="list-style-type: none"> > qualifications of the personnel preparing the plan > details of consultation undertaken with the community and agreed strategies to manage high noise generating works. <p><i>Prior to finalisation of this audit, the CNVMP was updated to include the outstanding information.</i></p> <p><i>This non-compliance has been CLOSED.</i></p>
WPHS-01 NC-03	Condition B17 The Construction Waste Management sub-plan (CWMP) must address, but not be limited to, the procedures for the management of waste including the following: <ul style="list-style-type: none"> (a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use for materials to remain; (b) information regarding the recycling and disposal locations (c) confirmation of the contamination status of the development areas of the site based on the validation results. 	The CWMP did not include: <ul style="list-style-type: none"> > details of how wastes records are to be recorded for the project on the Bingo and Mainland Civil registers. > nominate recycling and disposal locations. > address the potential for contaminated waste and contaminated waste management. <p><i>Refer to Recommendation WPHS-01/R01</i></p>
WPHS-01 NC-04	Condition B18 The Applicant must prepare a Construction Soil and Water Management sub-plan (CSWMSP) and the plan must address, but not be limited to the following:...	The site did not have a CSWMP. The document presented in Appendix G of the CEMP was an Erosion and Sediment Control Plan (ESCP) and did not address the requirements of the DPIE guideline for management plans as per Condition B12. <p>Prior to finalisation of this audit, a CSWMP had been prepared but it did not meet the full requirements of Condition B18.</p> <p><i>Refer to Recommendation WPHS-01/R02</i></p>
WPHS-01 NC-05	Condition B19 The Construction Flood Emergency Management sub-plan must address, but not be limited to, the following: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) address the provisions of the Floodplain Risk Management Guidelines (EHG); 	The CFEMP did not include: <ul style="list-style-type: none"> > qualifications of the experts that prepared the plan. > appropriate referencing to the Floodplain Risk Management Guidelines (EHG). <p><i>Refer to Recommendation WPHS-01/R03</i></p>

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ID	Requirement	Non-compliance
WPHS-01 NC-06	Condition C8 The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including sub-plans).	The Erosion and Sediment Control Plan was out of date and the controls were observed to be incorrectly installed. Sediment was observed in the gutter to Burroway Road adjacent to the site, indicating that sediment controls were not effective. <i>Refer to Recommendation WPHS-01/R04</i>

4.4 PREVIOUS AUDIT ACTIONS

Not applicable, as this is the initial IEA conducted on this Project.

4.5 PHYSICAL EXTENT OF THE PROJECT

The Crown Certificate prepared by Woods Bagot confirmed the architectural and interior design of the development and architectural set of drawings were consistent with BCA and the Development Consent, including the approved plans.

4.6 NON-COMPLIANCES RECORDED BY THE PROJECT

With the exception of the non-compliances identified by this IEA and documented in Section 4.3, no environmental non-compliances were recorded by the Project, during the reporting period.

4.7 COMPLAINTS

One complaint was received from a community member on 9 December 2023 relating to noise experienced at 3:30am in relation to the removal of a piling rig from site. The community member advised they were not aware of the Works Notice and were subsequently placed on the email distribution list to receive updates directly.

No other complaints attributable to the works, have been received on the Project.

4.8 INCIDENTS

No environmental incidents have been recorded to date on the Project.

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5 AUDIT FINDINGS – DISCUSSION

5.1 REVIEW OF ADEQUACY OF MANAGEMENT PLANS

The following management plans were reviewed as detailed in Appendix C, Table C2.

- > Construction Environmental Management Plan (CEMP)
- > Construction Traffic and Pedestrian Management Plan (CTPMP)
- > Construction Noise and Vibration Management Plan (CNVMP)
- > Construction Soil and Water Management Plan (CSWMP)
- > Construction Waste Management Plan (CWMP)
- > Air Quality Management Plan (AQMP)
- > Construction Flood and Emergency Management Plan (CFEMP)
- > Driver Code of Conduct (DCC)

The sub-plans were found not to meet the full requirements of the Development Consent and this was addressed in the corrective actions raised in Section 4.3 of this report.

The Project's performance against the requirements of the management plans is provided in Section 5.2.

5.2 REVIEW ENVIRONMENTAL PERFORMANCE

The overall standard of environmental management on site was high. RobertsCo demonstrated:

- > Key roles and responsibilities identified in the CEMP were up to date.
- > Records of site work inductions and toolbox talks and daily pre-starts with environmental topics were maintained.
- > Signage was erected in a prominent position at the entrance to the development.
- > Vehicles and traffic controls are maintained to minimise sediment tracking from the site, prevent queuing off-site and minimise traffic impacts during peak school periods.
- > Noise and vibration management controls were effectively implemented including noise and vibration monitoring, scheduling of trucks to the site, consultation with sensitive receivers, and general noise mitigation measures on site.
- > Waste records were maintained in a register including the tracking of special waste (asbestos) and waste disposal to facilities that are authorised to accept the waste.
- > Dust controls were effectively implemented.
- > A consultant was engaged to manage and monitor contamination including acid sulphate soils, asbestos management, an odour (ground gas and vapour).

Areas in need of improved performance where nonconformances were recorded against the CEMP and associated sub-plans were all related to soil and water management including:

- > Erosion and Sediment Control Plan was not effectively implemented:
- > Sediment trap was not installed.
- > Dirty water diversion drains leading to the sediment trap were not installed.

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- > Connection to Council stormwater system was not installed.
Sediment fence along the boundary with Burroway Road was not correctly installed and ineffectual (refer to Photo 9 and 10).
- > Sediment was observed in the gutters of Burroway Road adjacent to the site. (refer to Photo 4 and 5)
- > The ESCP was dated March 2022, prior to commencement of construction, and significant activity and profiling of the site has occurred since then. The ESCP required updating.
- > Stockpile management - In particular: Potential Acid Sulphate Soils (PASS) stockpiles must be placed on a High-density polyethylene (HDPE) liner to prevent the potential the leaching of contaminants; erosion and sediment control around stockpiles; and stockpile slopes should not exceed 2H:1V.

Non-compliance WPHS-01NC-06 against Condition C8 and Corrective Action WPHS-01/R04 was raised to address these findings. Refer to Table 10 of this report.

5.3 ACTUAL AND PREDICTED IMPACTS

Section 9 of the EIS provides a summary risk assessment of the Project's construction environmental impacts. These risks are summarised in Table 9, together with a high-level assessment of the Project's performance in managing the risks to-date.

Table 9: Actual versus predicted impact in the EIS

Aspect	Potential impact from the EIS	Project's performance in managing the risks to-date
Transport and accessibility	Approximately 20 heavy delivery movements will occur each day during construction. <i>Level of Impact: Low</i> <i>Residual: Low</i>	<p>The project was effectively implementing its Construction Traffic and Pedestrian Management sub-plan (CTPMSP). The CTPMSP (Table 2) estimates that up to 10 heavy rigid vehicle movements and up to 20 truck and dog movements per day will occur. This increases to 50 heavy rigid vehicle daily movements on pour days.</p> <p>For this audit period, RobertsCo advised actual truck movement were as follows:</p> <ul style="list-style-type: none"> > Up to 10 heavy rigid vehicle deliveries occurred for no more than 2 days during site establishment to import site sheds. > Up to 5 truck and dog movements sporadically throughout the audit period to export spoil from site. > Up to 10 heavy rigid vehicle movements for concrete pours within this reporting period. > Average over the reporting period = <5 truck movements per day (many days have had zero movements). <p>The impact of heavy vehicle movements is likely to be consistent with that predicted in the EIS.</p>

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Aspect	Potential impact from the EIS	Project's performance in managing the risks to-date
	Works will utilise on- street parking in the area. <i>Level of Impact: Low</i> <i>Residual: Low</i>	Provision has been made for off-street parking for the Project's construction workforce. The impact of construction parking on local roads is likely to be lower than predicted in the EIS.
Noise and vibration	Surrounding receivers will experience noise over 75dB(A) during construction. <i>Level of Impact: High</i> <i>Residual: Medium</i>	The project maintains real-time noise monitoring at the boundary to its closest sensitive receiver (Public School). The Project monitors its noise levels against NSW ICNG management levels for classrooms (assessed externally) which is 67 d(B)A Leq 15 mins. Monitoring undertaken during November and December 2022, confirmed that no exceedance event, attributable to the project, has been recorded during teaching hours. The impact of noise on sensitive receivers adjacent to the project is likely to be lower than predicted in the EIS.
Aboriginal cultural heritage	The ACHAR has identified that the site has no potential for Aboriginal cultural heritage sites given the land is reclaimed. <i>Level of Impact: Nil</i> <i>Residual: Nil</i>	No aboriginal cultural heritage items were encountered during construction. The impact to Aboriginal cultural heritage is likely to be consistent with that predicted in the EIS.
Contamination	The site is contaminated from previous industrial activities. <i>Level of Impact: High</i> <i>Residual: Low</i>	Site contamination has been managed in accordance with the requirements of the Approval. <ul style="list-style-type: none"> > Geosyntec Consultants was engaged by RobertsCo as the environmental consultant for the Project. > A site auditor was appointed by SINSW to conduct an audit of the land with respect to land contamination. Remediation has progressed in accordance with a RAP prepared by Parsons Brinkerhoff (PB) in 2015 and a RAP addendum prepared by Geosyntec Consultants in March 2022. At the time of the audit, a <u>draft</u> validation report prepared by Geosyntec Consultants concluded that "Soil validation results indicate that remediation of UST Location 1, UST Location 2 and the Mechanics Pit have been successfully executed in accordance with the requirements of the RAP/RAP Addendum". The impact of Contamination is likely to be consistent with that predicted in the EIS.
Acid sulfate soils	Acid sulfate soils have been identified during site investigations. <i>Level of Impact: High</i> <i>Residual: Low</i>	See contamination above.
Sediment and erosion	Construction activities have the potential to cause sediment and erosion impacts. <i>Level of Impact : Medium</i> <i>Residual: Low</i>	During the reporting period, the site had not prepared a Construction Soil and Water Management Plan and had not effectively implemented its Erosion and Sediment Control Plan. Sediment was observed in the gutter to

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Aspect	Potential impact from the EIS	Project's performance in managing the risks to-date
		<p>Burroway Road adjacent to the site, indicating that sediment controls were not effective.</p> <p>On this basis the impact of sediment and erosion is likely to be higher than that predicted in the EIS.</p>
Social impact	Noise impacts during Construction <i>Level of Impact: Medium</i> <i>Residual: Low</i>	See noise and vibration above.

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6 RECOMMENDATIONS

Recommendations to address non-compliance have been identified where the auditor has determined that the Project has not met a substantive requirement and corrective action is required to address the non-compliance.

Observations of concern have been identified where the auditor has determined that the Project has substantively met the relevant requirement however an improvement opportunity has been identified to improve ongoing environmental performance or prevent future non-compliances.

Recommendations identified during this audit are presented in Table 10. In accordance with the DPIE Audit Guideline, the Project is required to submit a response to any recommendations contained in the audit report.

For each recommendation, reference is made to the relevant section in the report or compliance tables where the non-compliances and observations of concern was raised. Please refer to this reference for context.

Table 10: Recommendations identified during the audit period

Report Reference	ID	Noncompliance	Recommendation
Table 8 and Appendix C, Table C1 Condition B17	WPHS-01/R01	WPHS-01 NC-03: The CWMP did not include: <ul style="list-style-type: none"> > details of how wastes records are to be recorded for the project on the Bingo and Mainland Civil registers. > nominate recycling and disposal locations. > address the potential for contaminated waste and contaminated waste management. 	Update the CWMSMP to include: <ul style="list-style-type: none"> > Details of how wastes records are to be recorded for the project on the Bingo and Mainland Civil registers. > nominate recycling and disposal locations. > address the potential for contaminated waste and contaminated waste management.
Table 8 and Appendix C, Table C1 Condition B18	WPHS-01/R02	WPHS-01 NC-04: The site did not have a CSWMP. The document presented in Appendix G of the CEMP was an Erosion and Sediment Control Plan (ESCP) and did not address the requirements of the DPIE guideline for management plans as per Condition B12.	Prepare a SWMP to address the full requirements of CoA B18 and A10.
Table 8 and Appendix C, Table C1 Condition B19	WPHS-01/R03	WPHS-01 NC-05: The CFMEMP did not include: <ul style="list-style-type: none"> > qualifications of the experts that prepared the plan. > appropriate referencing to the Floodplain Risk Management Guidelines (EHG). 	Update the CFMESP to include qualifications of the experts that prepared the plan. Provide appropriate referencing to the Floodplain Risk Management Guidelines (EHG).

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Report Reference	ID	Noncompliance	Recommendation
Table 8 and Appendix C, Table C1 Condition C8	WPHS-01/R04	WPHS-01NC-06: The Erosion and Sediment Control Plan was out of date and the controls were observed to be incorrectly installed. Sediment was observed in the gutter to Burroway Road adjacent to the site, indicating that sediment controls were not effective.	Develop progressive ESCP that are regularly updated for site conditions. Implement the updated ESCP on-site and undertake pre and post rainfall inspections of controls.
Appendix C, Table C1 Condition A10	WPHS-01/R05	WPHS-01 Obs-01: Whilst the consultation details outlined in Condition A10, for plans and other documents required by this Approval, were accessible to the auditor, they were not appended to the relevant document, as is considered industry standard by the Department.	Where conditions of the Project Approval require consultation with an identified party in the preparation of a plan or other document, append details required by Condition A10, to the document.
Appendix C, Table C1 Condition B13	WPHS-01/R06	WPHS-01 Obs-02: There has been no high-level independent review of the CEMP and supporting plans for this Project. Numerous avoidable deficiencies were identified in the sub-plans, which may not have occurred, if an independent review as per the intent of Condition B13 had been undertaken.	Consult with DPE on an acceptable resolution of the reluctance of the Certifier to approve the CEMP. This may include a review by an independent third party, acceptable to DPE.

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APPENDICES

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APPENDIX A – PLANNING SECRETARY AUDIT TEAM AGREEMENT

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Ms Kendal Caynes
Manager Planning Compliance
School Infrastructure NSW
Level 8 259 George Street
SYDNEY New South Wales 2000

16/01/2023

Dear Kendal Caynes

Sydney Olympic Park new high school - Independent Auditor Nomination (SSD-11802230)

I refer to your request for the Secretary's approval of suitably qualified persons to prepare the **Independent Audit** for the Sydney Olympic Park new high school - Independent Auditor Nomination (SSD-11802230-PA-3).

The Department of Planning and Environments Planning Group (**NSW Planning**) has reviewed the nominations and information you have provided. NSW Planning is satisfied that Maurice Pignaelli is suitably qualified and experienced however Richard Peterson, Alistair Smith and Constance Georgiou do not hold either Lead or Principle environmental Auditor certification as required by the *Independent Audit Post Approval Requirements 2020*.

Consequently, I can advise that the Secretary **only** approves the appointment of Maurice Pignatelli to prepare the Independent Environmental Audit.

In accordance with Condition C37 of SSI-11802230 (the **Consent**) and the Independent Audit Post Approval Requirements, the Secretary has agreed to the independent auditor as;

- Maurice Pignatelli.

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

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

NSW Planning reserves the right to request an alternate auditor or audit team for future audits. Please note that this approval of the above audit team is conditional upon them maintaining certification as a lead or principal auditor with a relevant industry body.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to

Department of Planning and Environment



NSW Planning, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact Damien Smith on 02 9995 6289 or compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read "R. Sherry".

Rob Sherry
Team Leader Compliance - Government Projects
Compliance

As nominee of the Planning Secretary



APPENDIX B – SITE INSPECTION PHOTOGRAPHS

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Appendix E – Site photographs

Photos 1 and 2: Signage in accordance with the Approval.



Photo 3: A tree adjacent to the site was located behind a traffic calming island and not in the impact zone of heavy vehicles.

The site boundary fence was encroaching on the street foot path. A Temporary Road and Footpath occupancy permit was obtained from Parramatta City Council.

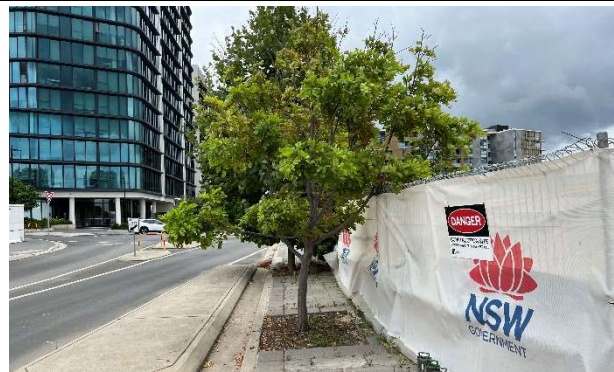


Photo 4 and 5: Sediment was observed in the gutter to Burroway Road adjacent to the site, indicating that sediment controls were not effective.

Minor tracking was observed from the site's eastern exit. There was no haulage on the day of the site inspection.



Photo 6-7: Rumble grids were located at both heavy vehicle exits for the site. A water hose was also present at each exit to wash down vehicles, as required, before they exit the site.

Approaches and departures from the eastern rumble grid required maintenance, to minimise tracking onto public roads.



Photo 8: Waste skips were located on site for comingled waste.



Photo 9-10: Sediment fences were not correctly installed across the site. The sediment fences were not trenched into the ground, as required by the Blue Book. Many sediment fences were raised from the ground allowing sediment laden water to flow unrestricted.



Photo 11: Stockpiles of waste concrete were segregated from other wastes.

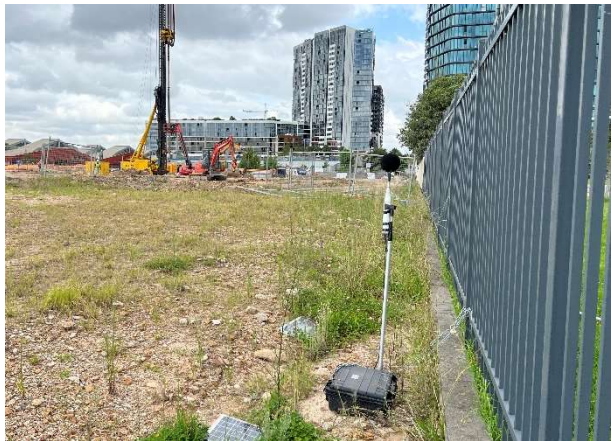
A stockpile of PASS was laid on and covered by an orange geofabric.



Photo 12: Proximity of residential sensitive receivers relative to the site.



Photo 13 and 14: A real-time noise monitor was located on the site and adjacent to the boundary with the Primary School.





APPENDIX C – INDEPENDENT AUDIT COMPLIANCE TABLE

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Appendix C: Table C1: Compliance Table against the Development Consent (SSD 11802230)



Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
PART A ADMINISTRATIVE CONDITIONS				
Obligation to Minimise Harm to the Environment				
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and, if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development.	This table	<p>This audit did not identify any reasonable and feasible measures, that were necessary to prevent/minimise any material harm to the environment that may result from the construction of the development.</p> <p>It is noted that a number of non-compliances were identified by this audit which require improvement in site controls, however failure to provide these controls were not likely to lead to material harm. These non compliances are addressed under the respective conditions of consent.</p>	Compliant
Terms of Consent				
A2	The development may only be carried out:			
	(a) in compliance with the conditions of this consent;	Structural design certificate 221019_Civil Design Certificate CC1_Rev01 dated 19 October 2022	The Crown Certificate prepared by Woods Bagot confirmed the architectural and interior design of the development, architectural set of drawings, is consistent with BCA and Condition A2(a-d) of the Approval.	Compliant
	(b) in accordance with all written conditions of the Planning Secretary;	Written response by Project Manager to audit questionnaire.	The proponent has not received any written conditions, in addition to the conditions of this consent.	Not triggered
	(c) generally in accordance with the EIS as amended by the Amendment Report and Response to Submissions' to the EIS and Amendment		Mitigation measures identified in the EIS (Section 9) have been incorporated into the Conditions of Approval	Compliant
	(d) in accordance with the approved plans in the table below.	<i>Woods Bagot letter - CC1Compliance - Sydney Olympic Park New High School Project dated 18 October 2022</i>	The CC1 compliance letter confirms that "Crown Certificate (CC1) architectural set of drawings, is consistent with requirements of Condition A2(a-d)	Compliant
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; (b) any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and (c) the implementation of any actions or measures contained in any such document referred to in (a) above.	Written response by Project Manager to audit questionnaire.	The proponent has not received any written directions, in addition to the conditions of this consent.	Not triggered
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		No inconsistencies have been identified	Not triggered
Compliance				
A5	This consent lapses five years after the date of consent unless work is physically commenced.		Work on site physically commenced on 30/10/2022.	Not triggered
Student Numbers				
A6	The student population must not exceed 850.		Beyond the scope of this audit	Not triggered
A7	Notwithstanding condition A6, the maximum student population may exceed 850 by up to a maximum 20 additional students from time to time, to allow for anticipated enrolment fluctuations on a temporary basis		Beyond the scope of this audit	Not triggered
Prescribed Conditions				
A8	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.		Beyond the scope of this audit	Not triggered
Planning Secretary as Moderator				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
A9	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. 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.	Written response by Project Manager to audit questionnaire.	No disputes have occurred to date.	Not triggered
Evidence of Consultation				
A10	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document for information or approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	<p>Refer to Conditions B15, B16 and B18</p> <p>UPDATE 16/02/23: Wentworth Point new High School, Construction Noise and Vibration Management Plan dated 13 February 2023</p> <p>UPDATE 16/02/23: Wentworth Point new High School, Construction Traffic and Pedestrian Management Sub-Plan dated 13 February 2023</p> <p>Update 16/02/23: Construction Soil and Water Management Plan (CSWMP) Wentworth Point High School dated 8 February 2023</p>	<p>Consultation with an identified party is required by Conditions B15, B16 and B18. The extent of consultation is addressed in this table, under the relevant condition.</p> <p>Condition B15(b) requires consultation with Council and TfNSW in relation to the CTMP. Upon review of the CTPMP, correspondence from Council was appended to the report under Appendix E. Details of correspondence with Council addresses the requirements of Condition A10 as follows: - A10(a) Council consulted as per condition B15 - A10(b) (i) Council's requirements have been appended to the report however there is no guidance provided on which elements have been accepted/not accepted. - A10(b) (ii) There are no details of outstanding disagreements (if any).</p> <p>Details of correspondence with TfNSW was not appended to the report. Other correspondence sighted addresses the requirements of Condition A10 as follows: - A10(a) TfNSW consulted as per condition B15 - A10(b) (i) TfNSW's requirements were documented, together with how the requirements had been addressed in the CTMP and closed out. - A10(b) (ii) There were no outstanding disagreement (all closed)</p> <p>Condition B16(e) requires consultation with the community in relation to the SCNVMP. Section 8 of the CNVMP outlines the proposed consultation process with the community but no consultation had not occurred at the time of drafting the plan hence no strategies, developed in consultation with community, have been documented.</p> <p>Condition B18(a) requires consultation with Council in relation to the SWMP. Details of correspondence with Council was not appended to the report. Other correspondence sighted addresses the requirements of Condition A10 as follows: - A10(a) Council consulted as per condition B18. - A10(b) (i) TfNSW's requirements were documented, together with how the requirements had been addressed in the CTMP and closed out. - A10(b) (ii) There were no outstanding disagreement (all closed)</p> <p>UPDATE 16/02/23: The CTPMP and CNVMP was updated prior to completion of this audit. A review of the updated plan confirmed that consultation with the community was documented in the plan in accordance with CoA A10.</p> <p>UPDATE 16/02/23: A new CSWMP was prepared prior to completion of the audit. At the time of drafting this report, the new CSWMP had not been distributed to Council for consultation. This issue is discussed further under CoA B18.</p> <p>OBSERVATION OF CONCERN WPHS-01/Obs-01: Whilst the consultation details outlined in Condition A10, for plans and other documents required by this Approval, were accessible to the auditor, they were not appended to the relevant document, as is considered industry standard by the Department.</p>	Compliant
Staging				
A11	The project may be constructed in stages. Where compliance with conditions is required to be staged due to staged construction, a Staging Report must be prepared and submitted to the satisfaction of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction.	Written response by Project Manager to audit questionnaire.	The development is being constructed in one stage therefore a staging report was not required.	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
A12	A Staging Report prepared in accordance with condition A11 must: (a)if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish (b)specify how compliance with conditions will be achieved across and between each of the construction stages of the project; and (c) set out mechanisms for managing any cumulative impacts arising from the proposed staging.	Written response by Project Manager to audit questionnaire.	The development is being constructed in one stage therefore a staging report was not required.	Not triggered
A13	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	Written response by Project Manager to audit questionnaire.	The development is being constructed in one stage therefore a staging report was not required.	Not triggered
A14	Where construction is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report including independent auditing requirements.	Written response by Project Manager to audit questionnaire.	The development is being constructed in one stage therefore a staging report was not required.	Not triggered
Staging, Combining and Updating Strategies, Plans or Programs				
A15	The Applicant may: (a) prepare and submit any strategy, plan (including management plan, architectural or design 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 (including management plan, architectural or design plan) or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan (including management plan, architectural or design plan) or program); (b) combine any strategy, plan (including management plan, architectural or design plan), or program required by this consent (if a clear relationship is demonstrated between the strategies, plans (including management plan, architectural or design plan) or programs that are proposed to be combined); and (c) update any strategy, plan (including management plan, architectural or design plan), or program required by this consent (to ensure the strategies, plans (including management plan, architectural or design plan), or 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).g management plan, architectural or design plan), or 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).	Written response by Project Manager to audit questionnaire.	The development is being constructed in one stage therefore a staging report was not required.	Not triggered
A16	Any strategy, plan or program prepared in accordance with condition A15, where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary.	Written response by Project Manager to audit questionnaire.	The development is being constructed in one stage therefore a staging report was not required.	Not triggered
A17	If the Planning Secretary agrees, a strategy, plan (including management plan, architectural or design plan), or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Written response by Project Manager to audit questionnaire.	The development is being constructed in one stage therefore a staging report was not required.	Not triggered
A18	Updated strategies, plans (including management plan, architectural or design plan), or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan, program or drawing.	Written response by Project Manager to audit questionnaire.	The development is being constructed in one stage therefore a staging report was not required.	Not triggered
Compliance				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
A19	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. Notes: • Environmental Planning and Assessment (Development Certification)	Structural design certificate 221019_Civil Design Certificate CC1_Rev01 dated 19 October 2022	The Crown Certificate prepared by Woods Bagot confirmed the architectural and interior design of the development, architectural set of drawings, is consistent with BCA and Condition A2(a-d) of the Approval. At the time of the audit, the buildings had not been constructed, hence "not triggered" has been awarded.	Not triggered
External Walls and Cladding				
A20	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	Woods and Bagot 'Sydney Olympic Park School Façade' letter dated 14 September 2022 by Woods and Bagot to Roberts Co. Pty Ltd	Woods and Bagot confirmed that "the products and systems proposed for the use in the construction of external walls, including finishes and claddings comply with the requirements of BCA. At the time of the audit, the buildings had not been constructed, hence "not triggered" has been awarded.	Not triggered
Applicability of Guidelines				
A21	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.		This is a note.	Noted
A22	Consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.		This is a note.	Noted
Monitoring and Environmental Audits				
A23	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non- compliance notification, Site audit report and independent auditing. 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		This is a note.	Noted
A24	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website): (i) the documents referred to in condition A2 of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent (v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint; (viii) a complaints register, updated monthly; (ix) audit reports prepared as part of any independent 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 satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.	https://www.schoolinfrastructure.nsw.gov.au/projects/w/wentworth-point-new-high-school.html#about-project-tab	The web page provides access to: - Department of Planning and Environment portal for SSD documentation - the Approval and Plans required by the Approval - Project updates updated six-monthly - Complaints register updated monthly - contact details via email or a on-line contact form - audits to date (N/A) Reporting of environmental performance and summary of monitoring results were not available on the web-page at the time of the audit, however no environmental performance reporting or monitoring had been triggered by the management sub-plans.	Compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
Compliance				
A25	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Robertson Introduction and project overview, Nov 22 Rev01.	Management plans are covered in the induction and the key requirements as they impact on workforce are addressed, as it relates to the Civil works (activities on site). - hours of work - site setup and gates - Traffic control Plans - noise and vibration management - sediment control plan - complaints process - hazardous materials - air and dust monitoring	Compliant
Incident Notification, Reporting and Response				
A26	The Planning Secretary must be notified through the major projects portal 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.	Written response by Project Manager to audit questionnaire.	There has been no incidents on site to date.	Not triggered
A27	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2 .	Written response by Project Manager to audit questionnaire.	There has been no incidents on site to date.	Not triggered
Non-Compliance Notification				
A28	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	Written response by Project Manager to audit questionnaire.	There has been no noncompliances to date.	Not triggered
A29	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.	Written response by Project Manager to audit questionnaire.	There has been no noncompliances to date.	Not triggered
A30	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Written response by Project Manager to audit questionnaire.	There has been no noncompliances to date.	Not triggered
Revision of Strategies, Plans and Programs				
A31	Within three months of: (a) the submission of a compliance report under condition A27; (b) the submission of an Independent Audit under condition C36 or C38; (c) the approval of any modification of the conditions of this consent; or (d) the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	Written response by Project Manager to audit questionnaire.	There has been no triggers for a review in relation to the development to date.	Not triggered
A32	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) within six weeks of the review. <i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>	Written response by Project Manager to audit questionnaire.	There has been no triggers for a review in relation to the development to date.	Not triggered
Burroway Road Drop-off / Pick-up Facilities				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
A33	<p>Within 6 months of the school population forecasted to reach 510 students, appropriate surveys must be undertaken of the Burroway Road drop-off/pick-up facilities in both the morning and afternoon peak periods (over multiple days) to determine the adequacy of the operation of the drop-off/pick-up facilities and adjoining/surrounding road network and its ability to accommodate student population demands. The surveys must include:</p> <p>(a) the number of vehicles using the drop-off/pick-up facilities throughout the morning and afternoon drop-off/pick-up peak periods;</p> <p>(b) the number of occupied and unoccupied parking spaces within the drop-off/pick-up facilities on Burroway Road throughout the morning and afternoon peak periods;</p> <p>(c) the extent of any vehicle queuing that takes place within the drop-off/pick-up facilities or surrounding streets during the morning and afternoon school drop-off/pick-up peak periods;</p> <p>(d) typical dwell time (length of stay) of vehicles within the drop-off/pick-up facilities; and</p> <p>(e) the proportion of students being dropped off at locations other than the drop-off/pick-up facilities, including on surrounding streets or within Wentworth Public School drop-off/pick-up facilities, via interview surveys to be conducted by the school.</p>		The site was not operational.	Not triggered
A34	<p>Following completion of the surveys under Condition A33, a report must be prepared by a suitably qualified person and submitted to the satisfaction of the Planning Secretary and to Council for information. The</p> <p>(a) include an analysis, based on the findings from the surveys which identifies any existing shortfall in capacity of drop-off/pick-up facilities operation, consequent vehicle queuing and student drop-off/pick-up on surrounding streets;</p> <p>(b) assess the likely increase in demand on the drop-off/pick-up facilities based on the additional vehicle trips associated with the school reaching full student capacity (850) and conclude whether the increase demand for drop-off/pick-up facilities could be accommodated on Burroway</p> <p>(c) where the report concludes that insufficient space would be available on Burroway Road to accommodate the additional demands, to ensure that the increase in students to 850 would not adversely affect the safety or efficiency of surrounding streets the report must detail sufficient mitigation measures including but not limited to:</p> <p>(i) additional on-site management staffing of the drop-off/pick-up facilities to provide for efficient traffic management and facilitate a higher turnover of vehicles within the area;</p> <p>(ii) staggered start and finish times to spread the drop-off/pick-up demand over a longer time periods;</p> <p>(iii) frequent or annual review of the School Transport Plan to improve effectiveness of mode share shifts towards public and active transport options; and</p> <p>(iv) provision of additional drop-off/pick-up facilities on Burroway Road or future roads.</p>		The site was not operational.	Not triggered
A35	Any mitigation measures recommended in the report required by condition A34, must be implemented prior to the school reaching 850 students. Evidence of any implemented mitigation measures must be submitted to the satisfaction of the Planning Secretary and a copy provided to Council for information		The site was not operational	Not triggered
Removal of Encumbrances on RE1 Land				
A36	Prior to Council acquiring the portion of the site zoned RE1 Public Recreation (if acquisition is pursued by Council), any encumbrances including fencing are to be removed by the Applicant, as directed by Council.	Please advise status	RE1 portion of land has not been effected by this stage of the project. Council has not directed the project to remove any encumbrances.	Not triggered
Design Modifications				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
A37	The perforated aluminium screen used as roof top plant enclosures (identified metal screen 06 – on the drawing titled Materials Schedule, Revision A and dated 09/09/22) must be of a colour/tone in keeping with the metal anodised finish of the upper façade levels (street frontages) and lift overruns. Details must be submitted to the satisfaction of the Planning Secretary prior to construction of building (excluding fencing, drainage, remediation, footings, ground floor slab, retaining walls, bulk earth works or jump form for the lift shaft).	Written response by Project Manager to audit questionnaire.	The Project Manager confirmed that works have not progressed passed what is listed.	Not triggered
PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION				
Notification of Commencement				
B1	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.	Correspondence SSD 11802230 - WPHS - B1 - Notification of Commencement of Construction dated 28 October 2022	NSW Department of Education notified DPE of intention to commence construction on 31/10/2022.	Compliant
B2	If the construction or operation of the development is to be staged, the Planning Secretary 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.	Refer to Condition A11	This development is not staged.	Not triggered
Certified Drawings				
B3	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.	TTW Letter dated 17 October 2022 21126SAAA Structural Design Certificate - Sydney Olympic Park High School. BCA Logic Letter dated 21 October 2022, Re: Section 6.28(2) Environmental Planning and Assessment Act 1979-Crown Certificate (CC1) Sydney Olympic park New High School (item 11 incudes Structural engineers letter)	Sighted structural engineers letter confirming drawings as per applicable Australian standards Sighted CC1 conforming certifier was satisfied with structural engineers assessment.	Compliant
External Walls and Cladding				
B4	Prior to the commencement of construction, the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the BCA. The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	BCA Logic Letter dated 21 October 2022, Re: Section 6.28(2) Environmental Planning and Assessment Act 1979-Crown Certificate (CC1) Sydney Olympic park New High School (Item 12 includes Façade design certificate)	Information was provided to the Certifier. Certifier has not accepted façade information as it will be part of CC2 (superstructure) which is not yet due.	Not triggered
Pre-Construction Dilapidation Report - Protection of Public Infrastructure				
B5	Prior to the commencement of demolition, removal of buildings or construction (whichever occurs first), the Applicant must: (a) consult with the relevant owner and provider of services and Infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non- residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected; (c) submit a copy of the dilapidation report to the Planning Secretary, Certifier and Council. (d) provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested.	Pre Main Construction Dilapidation Survey AE21136 dated 19 September 2022 - survey of boundaries - Burroway Road	Dilapidation reports were prepared prior to construction commencing, of the project boundaries and Burroway Road. In addition: - Consultation with Council was sighted. - A copy was not sent to the Certifier. - Planning Secretary did not request a copy of the report. NON COMPLIANCE WPHS01/NC-01: A copy of the precondition dilapidation report had not been submitted to the Certifier.	Non-compliant
		UPDATE 16/2/23: Cover email submitting the Pre-construction Dilapidation report to Paramatta City Council dated 21/10/2022.	UPDATE 16/2/23: RobCo-GCOR004042 dated 9 February 2023 confirmed a copy of the precondition dilapidation report has been submitted to the Certifier, prior to finalising this audit	Status : Closed
Preconstruction surveys - adjoining properties				
B6	Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of any building (including residential, school and commercial) that are likely to be impacted by the construction of the development.	Wentworth Point High School, Construction Noise and Vibration Management Report (CNVMR) dated 27 September 2022	Section 7.1 of the CNVMR states "Based on the required construction activities to be undertaken as part of the project, as well s the proximity of the surrounding receivers to the site, the resulting construction vibration is unlikely to negatively impact on any surrounding receivers. On this basis pre-construction surveys under condition B6 have not been triggered. Refer to Photo 12.	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
B7	Where the offer for a pre-construction survey is accepted (as required by condition B6), the Applicant must arrange for a survey to be undertaken by a suitably qualified and experienced expert prior to the commencement of vibration generating works that could impact on the identified buildings.	Wentworth Point High School, Construction Noise and Vibration Management Report (CNVMR) dated 27 September 2022	Section 7.1 of the CNVMR states "Based on the required construction activities to be undertaken as part of the project, as well s the proximity of the surrounding receivers to the site, the resulting construction vibration is unlikely to negatively impact on any surrounding receivers. On this basis pre-construction surveys under condition B6 have not been triggered	Not triggered
B8	Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by condition B7, the Applicant must: (a) provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report; (b) submit a copy of the Pre-Construction Survey Report to the Certifier; and c)provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.	Wentworth Point High School, Construction Noise and Vibration Management Report (CNVMR) dated 27 September 2022	Section 7.1 of the CNVMR states "Based on the required construction activities to be undertaken as part of the project, as well s the proximity of the surrounding receivers to the site, the resulting construction vibration is unlikely to negatively impact on any surrounding receivers. On this basis pre-construction surveys under condition B6 have not been triggered	Not triggered
Community Communication Strategy				
B9	No later than 48 hours before the commencement of construction, a Community Communication Strategy must be submitted to the Planning Secretary for information. The Community Communication Strategy must 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 for a minimum of 12 months following the completion of construction.	221028-Patrick Mills-Submission of B9 to PS dated 8 October 2022	Email correspondence confirmed that the Community Consultation Strategy was submitted to the Planning Secretary on 8/10/2022. Construction commenced on 30/10/2022	Compliant
	The Community Communication Strategy must: (a) identify people to be consulted during the design and construction phases; (b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; (c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; (d) set out procedures and mechanisms: (i) through which the community can discuss or provide feedback to the Applicant; (ii) through which the Applicant will respond to enquiries or feedback from the community; and (iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation. (e) include any specific requirements around traffic, noise and vibration, visual impacts, amenity, flora and fauna, soil and water, contamination, heritage.	Community Communication Strategy - Wentworth Point new high School, V1, October 2022	(a) Section 3- Stakeholders identifies stakeholders, interest and involvement (b)Section 4 - Engagement approach sets out communications tools, construction works notification distribution methodology (c) Section 5 - Formation of community-based forums, if required, that focus on key environmental management issues for the development. (d) Section 4.1 and Section 6.5 (e)Section 4	Compliant
Ecologically Sustainable Development				
B10	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either: (a) registering for a minimum 4 star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifier; or (b) seeking approval from the Planning Secretary for an alternative certification process.	Green Building Council of Australia , Green Star Project Manager excerpts Rating tool Design and as built v1.3 for: - Building A - Building B - Gym building	Registration evidence for Building A on 1 March 2022, Building B on 4 March 2022 and the Gym on 4 March 2022 was sighted.	Compliant
Outdoor Lighting				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
B11	Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifier that all outdoor lighting to be installed within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements, AS 4282-2019 Control of the obtrusive effects of outdoor lighting and National Light Pollution Guidelines for Wildlife (Australian Government, 2020).	Written response by Project Manager to audit questionnaire.	Lighting has not been installed yet, piling and foundation works are still occurring on site.	Not triggered
Environmental Management Plan Requirements				
B12	Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). <i>Notes:</i> •The Environmental Management Plan Guideline is available on the Planning Portal at: https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval . •The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	Wentworth Point new High School, Construction Environmental Management Plan, AU122229 CEMP Final, 21 October 2022	The CEMP broadly addresses the following as per the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020): - consultation with relevant stakeholders - internally approved by an authorised representative of the contractor - documents version control - has an introduction, project description and scope - references the CCS and approval consent conditions - outlines the environmental management structure, responsibilities, accountabilities and training - compliance requirements - identification of environmental risks and mitigation measures - environmental monitoring requirements and auditing - environmental control maps - non-conformance and corrective actions Compliance of individual sub-plans with Condition B12 is addressed under their respective condition below.	Compliant
Construction Environmental Management Plan				
B13	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier for approval. The CEMP must include, but not be limited to, the following: (a) Details of: (i) hours of work; (ii) 24-hour contact details of site manager; (iii) management of dust and odour to protect the amenity of the neighbourhood; (iv) groundwater management plan including measures to prevent groundwater contamination; (v) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting; (vi) community consultation and complaints handling as set out in the Community Communication Strategy required by condition B9; (b) an unexpected finds protocol for contamination and associated communications procedure to ensure that potentially contaminated material is appropriately managed; (c) Construction Traffic and Pedestrian Management Sub-Plan (see condition B15); (d) Construction Noise and Vibration Management Sub-Plan (see condition B16); (e) Construction Waste Management Sub-Plan (see condition B17); (f) Construction Soil and Water Management Sub-Plan (see condition B18); and (g) Construction Flood Emergency Management Plan (see condition B19).	Caloric CADV000086 GCOR000956 Re: SSD Condition of Consent dated 28/10/2022 Wentworth Point new High School, Construction Environmental Management Plan, AU122229 CEMP Final, 21 October 2022	RobertsCo correspondence confirmed that the CEMP was submitted to the Certifier for approval. The plan broadly addresses: (a) Details of: (i) addressed in Section 2.6 (ii) Section 9 identifies the Site Project Manager, Health and Safety Manager and Environment Manager as 24 hour contacts. (iii) Section 4.5 addresses air quality (iv) Section 4.8.2 addresses groundwater (v) Section 4.9 addresses lighting (vi)Section 5 addresses communications. (b) Appendix B comprises an unexpected finds protocol. (c) Appendix D comprises TPMP (d) Appendix E- NVMP (e) Appendix F - Waste Management Plan (f) Appendix G - CSWMP (g) Appendix H- CFEMP On this basis,the CEMP broadly complies with this conditon. It is noted however that whilst The Certifier, BCA Logic, confirmed receipt of the CEMP as per the requirement of the condition. The CEMP was not approved. The Certifier advised that he was not qualified to approve the CEMP and supporting plans. OBSERVATION OF CONCERN WPHS-01/Obs-02: There has been no high level independent review of the CEMP and supporting plans for this Project. Numerous avoidable deficiencies were identified in the sub-plans, which may not have occurred, if an independent review had been undertaken.	Compliant
B14	A copy of the approved CEMP, including sub plans must be provided to the Planning Secretary within two working days of it being requested.		DPE have not requested a copy of the CEMP.	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
B15	<p>The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced person(s);</p> <p>(b) be prepared in consultation with Council and TfNSW;</p> <p>(c) detail;</p> <p>(i) measures to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services;</p> <p>(ii) measures to ensure the safety of vehicles and pedestrians accessing adjoining properties where shared vehicle and pedestrian access occurs;</p> <p>(iii) heavy vehicle routes, access and parking arrangements;</p> <p>(iv) the swept path of the longest construction vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, in accordance with the latest version of AS 2890.2; and</p> <p>(v) arrangements to ensure that construction vehicles enter and leave the site in a forward direction unless in specific exceptional circumstances under the supervision of accredited traffic controller(s).</p>	<p>Wentworth Point new High School, Traffic Management Plan dated 11 October 2022</p> <p>Appendix E</p> <p>- Consultation with Council</p> <p>- Consultation records with TfNSW.</p>	<p>(a) CTMP prepared under the guidance of a chartered traffic engineer</p> <p>(b) The CTPMP was prepared in consultation with Council and TfNSW. Correspondence with Council was appended to the report as Appendix E. Correspondence with TfNSW was not appended to the report however was sighted that corresponded with TfNSW had occurred. Refer to Condition A10 for recommendation</p> <p>(c(i) Section 4</p> <p>(c(ii) Section 4 and Appendix C of CTMP</p> <p>(c(iii) Section 2.4 and 6.1</p> <p>(c(iv) Appendix B</p> <p>(c(v) Appendix B & C</p>	Compliant
B16	<p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced noise expert;</p> <p>(b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);</p> <p>(c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</p> <p>(d) include strategies that have been developed with the community for managing high noise generating works;</p> <p>(e) describe the community consultation undertaken to develop the strategies in condition B16(d);</p> <p>(f) include a complaints management system that would be implemented for the duration of the construction; and</p> <p>(g) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures in accordance with the requirements of condition B12.</p>	<p>Wentworth Point new High School, Construction Noise and Vibration Management Plan dated 27 September 2022.</p>	<p>(a) The CNVMP was prepared by consultant Norman Disney and Young however the qualifications of the personnel preparing the plan had not been documented in the plan.</p> <p>(b) Section 5 outlines the noise mitigation measures</p> <p>(c) Section 5 outlines the noise mitigation measures</p> <p>(d) Section 8 of the CNVMP outlines the proposed consultation process with the community but no consultation had not occurred at the time of drafting the plan hence no strategies, developed in consultation with community, have been documented.</p> <p>(e) Section 8 of the CNVMP outlines the proposed consultation process with the community but no consultation had not occurred at the time of drafting the plan.</p> <p>(f) Section 9 describes the complaints management system as per the School Infrastructure NSW processes.</p> <p>(g) Section 6 outlines construction noise monitoring requirements</p> <p>NON COMPLIANCE WPHS01/NC-02: The CNVMP did not include:</p> <p>- qualifications of the personnel preparing the plan</p> <p>- include details of consultation undertaken with the community and agreed strategies to manage high noise generating works.</p>	Non-compliant
		<p>UPDATE 16/02/23: Wentworth Point new High School, Construction Noise and Vibration Management Plan dated 13 February 2023</p>	<p>UPDATE 16/02/23: The CNVMP was updated prior to completion of this audit (CNVMP dated 13/2/23). A review of the updated plan confirmed that the experts qualifications were provided and consultation with the community and strategies for managing high noise generating works were recorded in the updated plan.</p>	Status : Closed
B17	<p>The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following:</p> <p>(a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use for materials to remain;</p> <p>(b) information regarding the recycling and disposal locations; and</p>	<p>Wentworth Point new High School, Waste Management Plan dated 12 September 2022</p> <p>Bingo Industries Monthly waste report Djurwa Pty Ltd - Roberts Co Wentworth Point Site</p> <p>Mainland Civil Cartage Export Tracking Summary - Fill Material</p>	<p>(a) Waste records are addressed in Section 8 of the WMP.</p> <p>The Bingo Monthly report for waste disposal identifies recyclable materials and landfilled materials. For January 2023, it reported that 90.07% of wastes, by weight, were recycled. The Mainland Civil Cartage Export Tracking Summary - Fill Material register records waste quantities, classifications, disposal facility, and date.</p> <p>Details of how wastes records are to be recorded for the project on the Bingo and Mainland Civil registers should be referenced in the CWMSP</p>	Non-compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	(c) confirmation of the contamination status of the development areas of the site based on the validation results.		<p>Mainland Civil registers should be referenced in the CWMSR.</p> <p>(b) Waste recycling and disposal locations are not addressed in the CWMSR.</p> <p>(c) There is no strategy to address contaminated waste in the CWMSR.</p> <p>NON COMPLIANCE WPHS01/NC-03: The CWMP did not include:</p> <ul style="list-style-type: none"> • details of how wastes records are to be recorded for the project on the Bingo and Mainland Civil registers. • nominate recycling and disposal locations. • address the potential for contaminated waste and contaminated waste management. 	
B18	<p>The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMP) and the plan must address, but not be limited to the following:</p> <p>a) be prepared by a suitably qualified expert, in consultation with Council;</p> <p>(b) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;</p> <p>(c) describe all erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landform 2004) commonly referred to as the 'Blue Book';</p> <p>(d) include an Acid Sulphate Soils Management Plan, if required, including measures for the management, handling, treatment and disposal of acid sulphate soils, including monitoring of water quality at acid sulphate soils treatment areas;</p> <p>(e) direct all sediment laden water in overland flow away from the leachate management system and prevent cross-contamination of clean and sediment or leachate laden water;</p> <p>(f) 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)</p> <p>(g) detail all off-site flows from the site; and</p> <p>(h) 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 5-year ARI and 1 in 100- year ARI.</p>	<p>CEMP Appendix G - Erosion and sediment control plan SOPHS-TTW-CV-LO-0003 dated 17 March 2022</p> <p>Email correspondence between RobertsCo and City Of Parramatta dated 21/10/22</p> <p>Council email to RobertsCo dated 25 October 2022</p> <p>CEMP Appendix J - Acid Sulphate Soils Management Plan Rev 1 12 October 2022</p>	<p>At the time of the audit, the site did not have a CSWMP. The document presented in Appendix G of the CEMP was an erosion and sediment control plan (ESCP) and did not address the requirements of the DPIE guideline for management plans as per condition B12.</p> <p>A review of the ESCP confirmed that the ESCP addressed the requirements of the CSWMP as follows: the requirements of Condition B18 as follows:</p> <p>(a) qualifications of expert was not addressed. Email correspondence between RobertsCo and City of Parramatta confirmed attempts to seek consultation with the Council for the ESCP. There was no record of follow up or response by Council. Regarding the ESCP, Council email dated 26/10/22 stated that "while some of the referenced documents that provide the finer detail around the site dewatering and other soil and water management aspects have not been provided, in this case I believe that the general framework for managing these aspects is adequate as indicated". Refer to Condition A10 for recommendations.</p> <p>(b) Detail of a temporary construction vehicle exit has been provided. Management of the exit is not detailed and clean up of tracked material on roads is not addressed.</p> <p>(c) Addressed in the ERSED Plan</p> <p>(d) Addressed in CEMP Appendix J - Acid Sulphate Soils Management Plan Rev 1 12 October 2022</p> <p>(e) Not addressed</p> <p>(f) Not addressed</p> <p>(g) The ESCP shows that off-site flows from the site limited to a connection the Council stormwater system along Burroway Road. In practice, this did not occur. During the site inspection, it was observed that surface water was permitted to exit the site along the Burroway Road boundary.</p> <p>(h) Not addressed</p> <p>NON COMPLIANCE WPHS01/NC-04: The site did not have a CSWMP. The document presented in Appendix G of the CEMP was an erosion and sediment control plan (ESCP) and did not address the requirements Condition B18 and of the DPIE guideline for management plans as per condition B12.</p>	Non-compliant
		Update 16/02/23: Construction Soil an Water Management Plan (CSWMP) Wentworth Point High School dated 8 February 2023.	<p>UPDATE 16/02/23: Prior to completion of the audit, RobertsCo produced a CSWMP dated 8/2/23. A review of the updated CSWMP determined</p> <ul style="list-style-type: none"> - The CSWMP had not been distributed to Council for review. - Section 6.3(1) of the plan addressed measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site. - Section 6.3(2) and (3) addressed how the site will be managed in a wet-weather events in a limited capacity. It did not address the specific requirements of the CoA 18(f) and did not put in place a pre/post rainfall monitoring regime. - Section 6.3(4) addressed Management of off-site water flows 	Status: Open

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
B19	<p>The Construction Flood Emergency Management Sub-Plan must address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced person(s);</p> <p>(b) address the provisions of the Floodplain Risk Management Guidelines (EHG);</p> <p>(c) include details of:</p> <p>(i) the flood emergency responses for construction phases of the development;</p> <p>(ii) predicted flood levels;</p> <p>(iii) flood warning time and flood notification;</p> <p>(iv) assembly points and evacuation routes;</p> <p>(v) evacuation and refuge protocols; and</p> <p>(vi) awareness training for employees and contractors, and users/visitors.</p>	<p>CEMP Appendix H - Construction Flood Emergency Management Plan dated 23 September 2022</p>	<p>(a) The CFEMP was prepared by consultant Taylor Thompson and Whiting however the qualifications of the personnel preparing the plan have not been documented in the plan. A copy of the CV of the expert that prepared the plan, was subsequently appended to a revised copy of the plan.</p> <p>(b) Flood plains risk management guidelines is not referenced in Section 1.1</p> <p>(c)(i) Sections 3 and 5</p> <p>(c)(ii) Section 2</p> <p>(c)(iii) Section 3</p> <p>(c)(iv) Section 5</p> <p>(c)(v) Section 5,6 and 7</p> <p>(c)(vi) Section 6</p> <p>NON COMPLIANCE WPHS01/NC-05: The CFEMP did not include:</p> <p>- qualifications of the experts that prepared the plan.</p> <p>- appropriate referencing to the Floodplain Risk Management Guidelines (EHG).</p>	Non-compliant
B20	<p>A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following:</p> <p>(a) minimise the impacts of earthworks and construction on the local and regional road network;</p> <p>(b) minimise conflicts with other road users;</p> <p>(c) minimise road traffic noise; and</p> <p>(d) ensure truck drivers use specified routes</p>	<p>CTMP Appendix D - Truck driver code of conduct RobCo-Transmit-000575 CTMP dated 15/2/23</p> <p>Site interview</p>	<p>The Driver code of contact is appended to the CTMP as Appendix D. The driver code of conduct broadly addresses the requirements Condition B20.</p> <p>RobertsCo advised that all contractors had been provided with a copy of the CTPMP including the driver code of conduct during tender and award. To re-affirm the need to communicate the Truck driver code of conduct, the documents were re-distributed (RobCo-Transmit-000575 CTMP dated 15/2/23) to project contactors for distribution to heavy vehicle drivers.</p>	Compliant
Construction Worker Transportation Strategy				
B21	<p>Prior to the commencement of construction, the Applicant must submit a Construction Worker Transportation Strategy to the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be provided to the Planning Secretary within two working days of it being requested.</p>	Appendix C of the CTMSP.	Driver Code of Conduct is provided within the CTMP dated 11 October 2022, which is provided in SharePoint issued on 10 January 2023.	Compliant
Flood Management - Construction				
B22	<p>Prior to the commencement of construction, the Applicant must prepare and implement for the duration of construction:</p> <p>(a) flood warning and notification procedures for construction workers on site; and</p> <p>(b) evacuation and refuge protocols.</p>	Construction Flood Emergency Management Plan dated 23 September 2022	<p>The Construction Flood Emergency Management Plan dated 23 September 2022 details:</p> <p>- Section 3 Flood warnings and notifications</p> <p>- Section 5 - Assembly points and evacuation routes</p>	Compliant
Operational Noise – Design of Mechanical Plant and Equipment				
B23	<p>Prior to installation of mechanical plant and equipment:</p> <p>(a) a detailed assessment of mechanical plant and equipment with compliance with the relevant project noise trigger levels as recommended in the Acoustics Report, dated 8 June 2022 and prepared by Norman, Disney & Young must be undertaken by a suitably qualified person; and</p> <p>(b) evidence must be submitted to the Certifier that any noise mitigation recommendations identified in the assessment carried out under (a) have been incorporated into the design to ensure the development will not exceed the project noise trigger levels identified in the Acoustics Report, dated 8 June 2022 and prepared by Norman, Disney & Young.</p>		Operational requirement	Not triggered
Operational Waste Storage and Processing				
B24	<p>Prior to the commencement of construction of the waste storage and processing areas, the Applicant must obtain agreement from Council for the design of the operational waste storage area (where waste removal will be undertaken by Council). Where waste removal will be undertaken by a third party, evidence must be provided to the Certifier that the design of the operational waste storage area:</p> <p>(a) is constructed using solid non-combustible materials;</p> <p>(b) is designed to ensure the door/gate to the waste storage area is vermin proof and can be openable from both inside and outside the storage area at all times;</p>		Operational requirement	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	(c) includes a hot and cold water supply with a hose through a centralised mixing valve.			
	(d) is naturally ventilated or an air handling exhaust system must be in place; and			
	(e) includes signage to clearly describe the types of materials that can be deposited into recycling bins and general garbage bins			
Road and Pedestrian Infrastructure Works				
B25	Prior to the commencement of road and pedestrian infrastructure works to Burroway Road, the Applicant must submit plans and technical specifications to the satisfaction of the relevant roads authority and Council (including but not limited to landscaping, footpaths/pavement design, services, pedestrian crossing facilities on Burroway Road and Footbridge Boulevard, cross overs, drop-off/pick-up facilities).	Written response by Project Manager to audit questionnaire. Confirmed during the site inspection	Roadway works have not commenced on site.	Not triggered
B26	Prior to the commencement of construction of road works to Burroway Road, the Applicant must submit to the relevant road authority, an application for the proposed line markings and signage (including but not limited signs to facilitate waste collection and drop-off/pick-up facilities) and relevant surrounding streets to the relevant roads authority for approval. Notes: •Approval must be obtained for roadworks under section 138 of the Roads Act 1993. •All costs associated with the proposed road upgrade works must be borne by the Applicant. •In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent.	Written response by Project Manager to audit questionnaire. Confirmed during the site inspection	Roadway works have not commenced on site.	Not triggered
B27	The footpath along the entire Burroway Road frontage of the site (including the area adjacent to the roundabout) shall be widened with public domain materials and tree as stated in conditions B29 and B30. The width of the footpath shall be consistent with the widest section of the existing footpath with kerb that is located adjacent the site unless: (a)evidence is submitted to the satisfaction of Council, that the required footpath width is unable to be achieved having regard to the approved siting of the building and minimum road and parking lane width requirements adjacent the building; or (b)Council agrees that a lesser width is acceptable having regard to other evidence provided by the Applicant to Council.	Written response by Project Manager to audit questionnaire. Confirmed during the site inspection	Roadway works have not commenced on site.	Not triggered
B28	Where any section of the widened footpath requires the footpath be delivered within the development site as required by condition B27, the land on which the widened footpath is located must be dedicated to Council, unless an agreement has been reached with Council that does not require that dedication to occur.	Written response by Project Manager to audit questionnaire. Confirmed during the site inspection	Roadway works have not commenced on site.	Not triggered
Public Domain Works				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
B29	<p>Prior to the commencement of any footpath or public domain works (within that area along Burroway Road footpath in front of the site and extending 3 metres either side of site boundaries), the Applicant must consult with Council and demonstrate to the Certifier that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit detailed public domain construction drawings of approval for each stage from Council's Development and Traffic Services Unit Manager to the Certifier and must detail (unless otherwise approved by Council):</p> <p>(a)concrete unit paving, kerb ramp, and driveway crossovers comply with Council's Engineering Design Standards (DS40 Sheets 1-3 and DS10);</p> <p>(b)tactile ground surface indicators are provided and installed in accordance with Council's Public Domain Guidelines and AS 1428.1/AS 1428.4 (Design for Access and Mobility); and</p> <p>(c)the installation of Endeavour Energy light poles at the back of the footpath line as per existing light poles on the Burroway Road frontage.</p> <p><i>Note:</i></p> <ul style="list-style-type: none"> •<i>Inspection by Council officers would be required during works to ensure the public domain is constructed in accordance with Council Standards. Council's Civil Assets team must be contacted to determine hold points.</i> •<i>All works within the public domain must be constructed by licensed contractors and any soft landscape works are carried out by licensed landscape contractors .</i> 	<p>Written response by Project Manager to audit questionnaire. Confirmed during the site inspection</p>	Not applicable to CC1.	Not triggered
Street Trees				
B30	<p>Prior to the commencement of any footpath or public domain works (within that area along Burroway Road footpath in front of the site and extending 3 metres either side of the front boundary), the Applicant must consult with Council and demonstrate to the Certifier that:</p> <p>(a)a minimum 6 Cupaniopsis Anacardioides (Tuckeroo) trees of a minimum 200L pot size are to be planted along Burroway Road, with planter bed surrounds with location and spacing as determined by Council;</p> <p>(b)all trees are planted within a quality soil volume creating structural pavement system, in accordance with Council's Public Domain Guidelines and standards; and</p> <p>(c)all trees supplied would be grown in accordance with AS 2303:2018 (Tree Stock for Landscape Use).</p>	<p>Written response by Project Manager to audit questionnaire. Confirmed during the site inspection</p>	Neither footpath or public domain works have commenced.	Not triggered
B31	Any variations or alternatives to the requirements of condition B30 above can be undertaken in consultation and approval from Council.	<p>Written response by Project Manager to audit questionnaire. Confirmed during the site inspection</p>	Neither footpath or public domain works have commenced.	Not triggered
Site Contamination				
B32	Prior to the commencement of construction, the Applicant must engage a NSW EPA-accredited Site Auditor to provide advice throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed.	<p>L0002 Interim Audit advice (0503-2109-002) - SOPhS Wentworth Point dated 27/02/2022.</p> <p>Geosyntec Consultants 21067 RAP addendum 1 March 2022</p>	Mr Andrew Lau, a site auditor, accredited by the NSW EPA under the CLM Act 1997, (Accreditation number 0503) has been appointed by School Infrastructure NSW.	Compliant
Site Levels				
B33	<p>Prior to the commencement of construction, plans must be provided to the certifier demonstrating that:</p> <p>(a)to the northeast and eastern boundaries, the school site levels are coordinated and consistent with the future eastern road design finished surface levels (as available at that time); and</p> <p>(b)to the southern boundary facing Burroway Road, all works including ramps and entries are to be flush with the existing public domain levels, unless otherwise agreed with Council in relation to a future public domain level.</p>	<p>Compliance statement SOPHS-WB-AR-CC1 B33 dated 20 October 2022 from Woods Baggot</p> <p>Compliance statement SOPHS-WB-AR-CC1 B33 dated 13 February 2023 from Woods Baggot</p>	<p>Woods Baggot compliance statement dated 20 October 2022 confirmed that: - " to the northeast and eastern boundaries, the school site levels are coordinated and consistent with the future eastern road design finished surface levels (as available at this time).</p> <p>An update of the compliance statement, dated 13/2/23, included: - to the southern boundary facing Burroway Road, all works including ramps and entries are to be flush with the existing public domain levels, unless otherwise agreed with Council in relation to a future public domain level</p>	Compliant
Fire Safety and Registration of a Section 88B Instrument for Access				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
B34	<p>Prior to the commencement of construction of any building (excluding fencing, drainage, remediation, footings, ground floor slab, retaining walls, bulk earth works or jump form for the lift shaft), an accredited fire engineer and BCA consultant must certify a performance solution for fire protection, access and egress requirements for the development and evidence must be provided to the satisfaction of the Planning Secretary detailing:</p> <p>(a) any performance solution adopted, including any required wording for any associated Section 88B Instrument (if required under condition B35) has been developed in consultation with Fire and Rescue NSW and is compliant with Section C, D and E of the BCA; and</p> <p>(b) discharge exit points for occupants to evacuate the site, access for fire brigade intervention/access to pump room and external hydrants, and building separation from fire source features.</p> <p><i>Note: Any consultation with NSW Fire Brigade must also have regard to the NSW's Fire Brigade's Fire Safety Guideline Access for Fire Brigade Vehicles and Firefighters (2019)</i></p>	Written response by Project Manager to audit questionnaire.	Work has not progressed beyond... fencing, drainage, remediation, footings, ground floor slab, retaining walls, bulk earth works or jump form for the lift shaft	Not triggered
B35	<p>Prior to the commencement of construction of any building (excluding fencing, drainage, remediation, footings, ground floor slab, retaining walls, bulk earth works or jump form for the lift shaft), a Section 88B Instrument (under the Conveyancing Act 1919) must be prepared in terms to the satisfaction of the Planning Secretary and registered on the title of Lot 2 DP 1276305 (9 Burroway Road). The Section 88B Instrument must:</p> <p>(a) provide for an appropriate restriction on the use of the land (along the length of 7 Burroway Road's eastern site boundary) for uninterrupted fire safety, access and egress purposes;</p> <p>(b) name the Planning Secretary (or other party as directed by the Planning Secretary) as the prescribed authority</p> <p>(a) include provision that the Section 88B instrument can only be revoked, varied or modified with the consent of the named prescribed authority;</p> <p>(b) include provision for uninterrupted fire safety, access and egress with consideration to any future construction and development within 9 Burroway Road;</p> <p>(c) be appropriately sized to facilitate fire brigade intervention and ensure unhindered access and egress at all times that the school is operational; and</p> <p>(d) meet any reasonable requirements of Fire and Rescue NSW as</p>	Written response by Project Manager to audit questionnaire.	Work has not progressed beyond... fencing, drainage, remediation, footings, ground floor slab, retaining walls, bulk earth works or jump form for the lift shaft	Not triggered
B36	<p>The Section 88B Instrument required by Condition B35 may include:</p> <p>(a) provisions for extinguishment of the interest created by way of registration of the Section 88B Instrument required under condition B35 in circumstances where the future eastern road is dedicated as a public road and can be operationally used by the school for fire safety, access and egress purposes having regard to Sections C, D and E of the BCA.</p>	Written response by Project Manager to audit questionnaire.	Work has not progressed beyond... fencing, drainage, remediation, footings, ground floor slab, retaining walls, bulk earth works or jump form for the lift shaft	Not triggered
B37	<p>Registration of a Section 88B Instrument as detailed in conditions B35 and B36 is not required where evidence is submitted to the Planning Secretary's satisfaction in accordance with condition B34, confirming that a performance solution has been certified:</p> <p>(a) that does not rely on or require access over any adjoining land, other than land currently dedicated as a public road; and</p> <p>(b) the performance solution is consistent with any requirements of Fire and Rescue NSW as specified during consultation undertaken in accordance with condition B34.</p>	Written response by Project Manager to audit questionnaire.	Work has not progressed beyond... fencing, drainage, remediation, footings, ground floor slab, retaining walls, bulk earth works or jump form for the lift shaft	Not triggered
PART C DURING CONSTRUCTION				
Site Notice				
C1	<p>A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purpose of informing the public of project details and must satisfy the following requirements:</p>	Site inspection	A site notice(s) must be prominently displayed at the boundaries of the site. Refer to Photos 1 and 2 .	Compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	<p>(a) minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size;</p> <p>(b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period;</p> <p>(c) the approved hours of work, the name of the builder, Certifier, structural engineer, 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(s); and</p> <p>(d) the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted.</p>			
Operation of Plant and Equipment				
C2	All construction plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner.	<p>Roberts Co. Integrated Management System Form, Elevated work platform (pre-use acceptance checklist)</p> <p>Sighted Fundex 2800 Piling rig 1/12/22 pre use acceptance checklist and risk assessment</p> <p>Sighted 20T pad rollers 28/11/22 pre use acceptance checklist, Service history and risk assessment</p>	All plant items arriving on site are assessed via a pre-commencement checklist which includes the requirement for service and maintenance records.	Compliant
Construction Hours				
C3	<p>Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:</p> <p>(a) between 7am and 6pm, Mondays to Fridays inclusive; and</p> <p>(b) between 8am and 1pm, Saturdays.</p> <p>No work may be carried out on Sundays or public holidays.</p>		<p>The Contractor controls access to the site between 7am - 6pm Monday to Friday.</p> <p>The site remains closed on Saturdays.</p>	Compliant
C4	<p>Notwithstanding condition C3, provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours:</p> <p>(a) between 6pm and 7pm, Mondays to Fridays inclusive; and</p> <p>(b) between 1pm and 4pm, Saturdays.</p>		No work has been undertaken in the shoulder periods.	Not triggered
C5	<p>Construction activities may be undertaken outside of the hours in condition C3 and C4 if required:</p> <p>(a) by the Police or a public authority for the delivery of vehicles, plant or materials; or</p> <p>(b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or</p> <p>(c) where the works are inaudible at the nearest sensitive receivers; or</p> <p>(d) for the delivery, set-up and removal of construction cranes, where notice of the crane related works is provided to the Planning Secretary and affected residents at least seven days prior to the works; or</p> <p>(e) where a variation is approved in advance in writing by the Planning Secretary or his nominee if appropriate justification is provided for the works.</p>	<p>NHVR, NSW Class 1 Load carrying vehicle operator's guide dated 29/9/2022.</p> <p>Permit # 732102V1</p>	<p>After hours delivery of a pile rig occurred on 9 November 2022 in accordance with Condition C5(a) as it was required to be delivered to site after hours to meet TfNSW requirements as an oversized delivery.</p> <p>A copy of the NHVR permit was sighted.</p>	Compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
C6	Notification of such construction activities as referenced in condition C5 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	Comms notice for works outside boundary (RobertsCo reference # RobertsCo -GCOR-002955. Wentworth Point new high school Works Notification 18 November 2022 Wentworth Point works notice distribution register 19 Oct 22 to 7 Feb 2023	Community was notified of the out of hours delivery via a works notification. The Works Notice was circulated to neighbouring properties in hard copy, and via the mailing list in soft copy on 18 Nov 2023 (refer WPNHS Works Notice in folder C5). Notwithstanding, a complaint was received from a community member on 9 December 2023 relating to noise experienced at 3:30am in relation to the removal of a piling rig from site. The community member advised they were not aware of the Works Notice, and were subsequently placed on the email distribution list to receive updates directly. Letterbox drop and email list distribution of appropriate Works Notice occurred a minimum of 7 days prior the works being undertaken. A register of Wentworth Point works notice distribution was sighted.	Compliant
C7	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: (a) 9am to 12pm, Monday to Friday (b) 2pm to 5pm Monday to Friday; and (c) 9am to 12pm, Saturday.		None of the activities listed have occurred on site to date.	Not triggered
Implementation of Management Plans				
C8	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	Table A2: CEMP Conformance table	Compliance with the CEMP and supporting sub-plans was assessed by this audits and recorded in Table C2. Refer to table C2. In broad terms, the compliance statement of each plan / subplans was assessed as follow: CEMP Construction Traffic and Pedestrian Management Plan Noise and Vibration Management Plan Construction Waste Management Plan Air Quality Management Plan Construction Soil and Water Management Plan NON COMPLIANCE WPHS01/NC-06: The Erosion and Sediment Controls Plan was out of date and the controls were observed to be incorrectly installed. Sediment was observed in the gutter to Burroway Road adjacent to the site, indicating that sediment controls were not effective.	Compliant Compliant Compliant Compliant Compliant Non-Compliant
Construction Traffic				
C9	All construction vehicles (excluding site personnel vehicles) are to be contained wholly within the site, or the adjoining site (subject to landowner approval) except if located in an approved on-street work zone, and vehicles must enter the site or an approved on-street work zone before stopping.	Site interview	RobertsCo undertake a Crane board/delivery meeting each day to coordinate unloading and deliveries. No evidence of queuing was observed at the time of the audit. No complaints have been received regarding queuing.	Compliant
C10	The following hoarding requirements must be complied with: (a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and (b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application.	Site inspection	No third party advertising or graffiti was observed at the time of the inspection.	Compliant
No Obstruction of Public Way				
C11	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances.	Parramatta City Council (PCC), Temporary Road and Footpath occupancy permit. Ref TRO/33/2033 dated 30 January 2023	RobertsCo obtained a permit form PCC to obstruct the footpath on Burroway Road, adjacent to the site (refer to Photos 3, 4 and 5)	Compliant
Construction Noise Limits				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
C12	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.	Site inspection Implementation of the CNVMP NDY Construction Noise and Vibration Monitoring Report, November 2022 NDY Construction Noise and Vibration Monitoring Report, December 2022 RobertsCo diary entries of site activities on 9/12/22, 12/12/22 and 14/12/22.	RobertsCo undertakes real time noise monitoring at the site in accordance with the CNVMP. Alerts are provided to the Site Manager and Project Manager of any exceedances. No exceedances events have been recorded during teaching hours. Noise monitoring reports for November and December 2022 indicated that measured noise levels were below NSW ICNG management levels for schools, except for short durations on 9, 12 and 14 December 2022, during teaching hours. RobertsCo advised that these exceedances were not attributable to the Project. At the time of the exceedances works were being undertaken on the Landcom site to the north of the project boundary, in proximity to the noise monitors.	Compliant
C13	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C3.	Refer to C3	Works were not undertaken in stages.	Compliant
C14	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' to ensure noise impacts on surrounding noise sensitive receivers are minimised.	Interview	All equipment on site belongs contractors or hire vehicles. RobertsCo advised it is not practicable to require all suppliers to convert plant to quackers. The site has not received any complaint regarding noise for sensitive receivers.	Compliant
Vibration Criteria				
C15	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time)	CNVMP	Section 7 of the CNVMP states " <i>Due to the construction types proposed and average distances between the works and receivers, we do not anticipate any significant vibration effects with regards to DIN 4150-3 compliance for the protection of building structures. The most intensive activity is expected to be the piling works.</i> "	Not triggered
C16	Vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C15..	Interview	Vibration monitors have been installed. RobertsCo note that the works are more than 30m from any residential building. The closest residential tower is approximately 42m from the proposed compaction areas.	Not triggered
C17	The limits in conditions C15 and C16 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B16 of this consent.	CNVMP	No additional vibration criteria is identified in the CNVMP.	Not triggered
Tree Protection				
C18	For the duration of the construction works: (a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property;	Site inspection	As per TreeIQ AIA OPHS Rev F 27.08.21 reduced stipulates no street trees have been trimmed or removed.	Not triggered
	(b) all street trees immediately adjacent to the property boundaries must be protected at all times during construction in accordance with AS 4970:2009 (Protection of Trees on Development Sites) and under the supervision of a qualified arborist. Any street tree, which is damaged or removed during construction due to an emergency, or as otherwise approved by Council, must be replaced, to the satisfaction of Council; and	Site inspection	Trees on the footpath were not within an area of potential impact with vehicles. They were located behind an traffic calming island. Refer to Photo 3.	Not triggered
	(c) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.	Site inspection	Trees on the footpath were not within an area of potential impact with vehicles. They were located behind an traffic calming island. Refer to Photo 3.	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
Air Quality				
C19	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Site inspection	During the site inspection, there was no windblown dust evident as the conditions were clam.	Compliant
C20	During construction, the Applicant must ensure that: (a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Site inspection	The following dust controls were observed on site: -covered stockpiles (Refer to photo 11) - Irrigation system on site to enable watering down during windy conditions - cattle grid for wheel wash (Refer to photos 6 and 7) - Site personnel advise that all vehicles leaving the site are covered as per traffic regulations. - the whole site was active so there was no opportunity to rehabilitate sections of the site to reduce dust. - Site personnel also advised that random street sweeping is undertaken when required.	Compliant
Imported Fill				
C21	The Applicant must: (a) ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Certifier upon request.	Site interview	There has been no imported fill on to the site.	Not triggered
Disposal of seepage and stormwater				
C22	Adequate provisions must be made to collect and discharge stormwater drainage during construction to the satisfaction of the Certifier. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	Interview ESCP Site inspection	RobertsCo advised that: - Site has a permit to discharge to Council stormwater system however no discharge to the system has occurred. - Site is collecting water on site (western end, within site boundary) and it is permitted to seep into the ground. - Certifier has not been provided with strategy to collect and dispose of stormwater as no disposal off site via Council stormwater system is occurring.	Not triggered
Emergency management				
C23	The Applicant must prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes, for the duration of construction.	Sighted induction package	The site induction package addressed Emergency management	Compliant
Stormwater Management System				
C24	Within three months of the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifier. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the Amendment Report; (c) be in accordance with applicable Australian Standards; and (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines;	TTW Civil Design Certificate dated 18 October 2022 (item 10)	RobertsCo note that the certifier has approved CC1 which included TTW Civil Design Certificate dated 18 October 2022, which has been attached in folder C24 of the SharePoint. The Civil Design Certificate -CC1 prepped by TTW certifies compliance with the relevant standards.	Compliant
Aboriginal Heritage				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
C25	Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by Comber Consultants and dated 27 August 2021	EIS Appendix 9 - Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared by Comber Consultants and dated 27 August 2021	<p>The ACHAR recommended:</p> <p>1. Aboriginal community consultation in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 should continue for the remainder of the project, including input into the design principles of the new high school.</p> <p>2. As the study area is on reclaimed land and does not contain Aboriginal archaeological potential, no further Aboriginal archaeological assessment or testing is required.</p> <p>No construction related mitigation measures were identified by the ACHAR.</p> <p>The Aboriginal Education Consultative Group (AECG) have been consulted through Schematic Design and Detailed Design phases.</p>	Compliant
No Obstruction of Public Way				
C26	All waste generated during construction must be secured and maintained within designated waste storage areas or the adjoining site (subject to landowner approval) at all times and must not leave the site onto neighbouring public or private properties	Site inspection	<p>Designated areas were established for the storage of waste concrete and PASS on the adjoining site. Refer to Photo 11.</p> <p>Wasters generated on site are stored in comingled skip bins. Bingo take the bins for processing. Refer to Photo 8.</p>	Compliant
C27	All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	Mainland Civil Cartage Export Tracking Summary - Fill Material	The Mainland Civil Cartage Export Tracking Summary - Fill Material register records waste quantities, classifications, disposal facility, and date.	Compliant
C28	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	Site inspection	No waste concrete (except stockpiled in designated areas) or concrete rinse water was observed on site.	Compliant
C29	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.	<p>Bingo Industries Monthly waste report Djurwa Pty Ltd - Roberts Co Wentworth Point Site</p> <p>Mainland Civil Cartage Export Tracking Summary - Fill Material</p>	<p>The Bingo Monthly report for waste disposal identifies recyclable materials and landfilled materials. For January 2023, it reported that 90.07% of wastes, by weight, were recycled.</p> <p>The Mainland Civil Cartage Export Tracking Summary - Fill Material register records waste quantities, classifications, disposal facility, and date.</p>	Compliant
C30	The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance with the requirements of the relevant legislation, codes, standards and guidelines.	<p>Site interview</p> <p>Geosyntec Consultants " Draft Validation Report - Sydney Olympic Park High School" dated 19 December 2022</p>	<p>The draft validation report confirmed that waste classification occurred for spoil generated from the remedial excavations EX1, EX2, and EX3 and excess spoil from service trenches.</p> <p>The draft validation report concluded that "<i>Material from UST Location 1 (SP3B), UST Location 2 (SP2B) and the Mechanics Pit (SP1) requiring off-site disposal has been tested, waste classification letters prepared and appropriately disposed off-site to a facility licenced to receive the waste</i>".</p> <p>Based on the information available at the time of the draft validation report and subject to the findings of the site auditor, this condition is deemed compliant.</p>	Compliant
Air Quality				
C31	The Applicant must ensure that all external lighting is constructed, operated and maintained in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	Site interview	RobertsCo have advised this is ongoing. External lighting will be designed in accordance with all relevant requirements.	Not triggered
Site Contamination				
C32	The Applicant must conduct site investigations to confirm the full nature and extent of the contamination at the project area and comply with the following requirements:	JBS&G L0002 Interim Audit advice (0503-2109-002) - SOPhS Wentworth Point dated 27/02/2022.	Geosyntec Consultants was engaged by RobertsCo as the environmental consultant for the Project. The role of Geosyntec was to facilitate the delivery of remediation and validation activities to render the site suitable for the indented land	Compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	<p>(a) the site investigations must be undertaken, and the subsequent report(s), must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997;</p> <p>(b) the reports must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (Camp(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme; and</p> <p>(c) the recommendations of the Remedial Action Plan Addendum, dated 1 March 2022 and prepared by Geosyntec.</p>	<p>Geosyntec Consultants 21067 RAP addendum 1 March 2022</p> <p>Geosyntec Consultants " Draft Validation Report - Sydney Olympic Park High School" dated 19 December 2022</p>	<p>use as a high school.</p> <p>Mr Andrew Lau, a site auditor, accredited by the NSW EPA under the CLM Act 1997, (Accreditation number 0503) was appointed by School Infrastructure NSW to conduct an audit of the land with respect to land contamination.</p> <p>A RAP was prepared by Parsons Brinkerhoff (PB) in 2015 for a broader portion of land (Infrastructure Delivery Wentworth Point). The RAP addendum referred to in this condition was prepared by Geosyntec to document the site specific remediation and validation requirements to be followed in conjunction with the 2015 PB RAP.</p> <p>To demonstrate that remediation requirements were met, Geosyntec were present on site guide remediation works. They documented their findings in:</p> <ul style="list-style-type: none"> - Geosyntec Interim Validation report Sydney Olympic park High School dated 1 March 2022 (Report reference 21067 Final Interim VAL). - Geosyntec Consultants " Draft Validation Report - Sydney Olympic Park High School" dated 19 December 2022. <p>The draft validation report concluded that " <i>Soil validation results indicate that remediation of UST Location 1, UST Location 2 and the Mechanics Pit have been successfully executed in accordance with the requirements of the RAP/RAP Addendum</i>".</p> <p>Based on the information available at the time of the draft validation report, and subject to the findings of the site auditor, this condition is deemed compliant.</p> <p>Note: Early works undertaken for the Interim Validation report were beyond the scope of this Approval but noted for completeness.</p>	
C33	Remediation of the site must be carried out in accordance with Remedial Action Plan Addendum, dated 1 March 2022 and prepared by Geosyntec (and any variations to the approved by an NSW EPA-accredited Site Auditor as required by condition B32.	<p>L0002 Interim Audit advice (0503-2109-002) - SOPhS Wentworth Point dated 27/02/2022.</p> <p>Geosyntec Consultants 21067 RAP addendum 1 March 2022</p> <p>Geosyntec Consultants " Draft Validation Report - Sydney Olympic Park High School" dated 19 December 2022</p>		Compliant
C34	If work is to be carried out / completed in stages, a NSW EPA-accredited Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice(s).	<p>L0002 Interim Audit advice (0503-2109-002) - SOPhS Wentworth Point dated 27/02/2022.</p> <p>Geosyntec Consultants 21067 RAP addendum 1 March 2022</p>	Works were not undertaken in stages.	Not triggered
C35	The Applicant must ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site that would result in significant contamination.	<p>L0002 Interim Audit advice (0503-2109-002) - SOPhS Wentworth Point dated 27/02/2022.</p> <p>Geosyntec Consultants 21067 RAP addendum 1 March 2022</p> <p>Geosyntec Consultants " Draft Validation Report - Sydney Olympic Park High School" dated 19 December 2022</p>	Refer to CoA C32 and C33	Compliant
Independent Environmental Audit				
C36	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.	Refer to body of the main report	<p>This audit report represents the initial independent audit for the project. No other audits were undertaken within the audit period.</p> <p>Construction commenced on 31 October 2022. In accordance with the Audit Guideline, the initial independent audit must commence within 12 weeks of commencement of construction (that is 23 January 2023). This audit (desk-top assessment) commenced on 17 January 2023 when the proponent was requested to provide the auditor with documentary evidence of compliance with applicable conditions of the Approval. The site inspection was conducted on 8 February 2023.</p>	Compliant
C37	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	DPE letter to Schools Infrastructure dated 16 January 2023	DPE approved the nominated auditor to conduct the audit. Refer to main report.	Compliant
C38	<p>The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval</p> <p>Requirements, upon giving at least 4 week's notice (or timing) to the Applicant of the date upon which the audit must be commenced.</p>		The Secretary has made no request to undertake an audit at a time or frequency different to the audit guideline.	Not triggered
C39	In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must:		The applicants response to this audit report will occur after drafting this report. Therefore this requirement was not triggered prior to drafting this report.	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	<p>(a) review and respond to each Independent Audit Report prepared under condition C36 of this consent, or condition C38 where notice is given by the Planning Secretary;</p> <p>(b) submit the response to the Planning Secretary; and</p> <p>(c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.</p>			
C40	Independent Audit Reports and the applicant/proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements unless otherwise agreed by the Planning Secretary.		The applicants response to this audit report will occur after drafting this report. Therefore this requirement was not triggered prior to drafting this report.	Not triggered
C41	Notwithstanding the requirements of the Independent Audit Post Approval Requirements, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.		No request has been made to cease operational audits.	Not triggered
Operational Readiness Work				
C42	<p>Operational readiness work must not commence on site until the following details have been submitted to the Certifier:</p> <p>(a) a plan and description of the area(s) of the site to be used for operational readiness work (including pedestrian access) and areas still under construction (including construction access);</p> <p>(b) the maximum number of staff to be involved in operational readiness work on site at any one time;</p> <p>(c) arrangements to ensure the safety of school staff on the site, including how:</p> <p>(i) areas to be used for operational readiness work will be clearly and securely separated from the areas of the site still under construction;</p> <p>(ii) pedestrian access to and within the site will be managed to ensure no conflict with construction vehicle movements; and</p> <p>(d) access and parking arrangements to minimise impacts on the surrounding street network having regard to number of staff involved in operational readiness work on site at any one time and parking arrangements for construction workers on site.</p>		The site is not at the operational readiness stage.	Not triggered
C43	<p>Operational readiness work must only be undertaken in accordance with the details submitted under condition C42 and the following requirements:</p> <p>(a) no more than 15 staff are involved in operational readiness work;</p> <p>(b) no students or parents are permitted; and</p> <p>(c) the Applicant has implemented appropriate arrangements to ensure the safety of school staff.</p>		The site is not at the operational readiness stage.	Not triggered
PART D PRIOR TO COMMENCEMENT OF OPERATION			Beyond the scope of this audit	Not triggered

Appendix C: Table C2: Conformance Table against the CEMP and associated sub-plans



Section	Requirement	Evidence to be collected	Response/Findings/Recommendations	Conformance Status
CEMP				
3.1 Roles and responsibilities				
	Key roles for the project include: - Project Manager and Site Superintendent - Principal Contractor - Principal Contractor's Environmental Manager / coordinator - Other contractors	Site interview	RobertsCo confirmed that all roles identified in the plan are relevant and allocated. All roles relevant and allocated.	Conformance
3.2 Training and control measures				
3.2.1	Site work inductions All personnel including sub-contractors will receive a site induction prior to commencing work covering: - Role of CEMP - Project responsibilities - hours of work - known contamination and hazards - water quality and ESC - Traffic and access including carparking - Dust management - Emergency and incident management	Rconstruct register	Induction register Rconstruct safety system had 138 entries of personnel on site that have been inducted to the project. 36 personnel were on site at the time of the audit.	Conformance
3.2.2	Toolbox talks, training and awareness - method of raising and maintaining awareness of issues related to construction and upcoming works.	Toolbox meetings record 17/01/2023	Toolbox meeting for 17/01/23 confirm that environmental topics are addressed including: - erosion and sediment control - switching off plant when not occupied.	Conformance
3.2.3	Daily work briefings - method of informing personnel of environmental protection practices for the days activities.			
4.1 Signage				
	Erection of signs in prominent positions for: - unauthorised entry prohibited - Details of Principal Contractor including 24 hour contact - Details of certifier - approved construction hours Application for proposed signage submitted.	Site inspection	Signage has been erected on site. Refer to Photos 1 and 2	Conformance
4.2 Vehicle and traffic control				
	Vehicles shall be maintained to prevent transfer of mud or waste on to public roads including: - a wheel wash or manual removal (if required) - cattle grid in gravel bed	Site inspection	Cattle grid in gravel bed was observed on site. Refer to photo 6 and 7.	Conformance
	All vehicles are to be contained wholly on the site unless in an approved off street work zone.		Refer to CoA C9	Conformance
	All vehicles including concrete agitators do not arrive on site or surrounding residential precincts outside of construction hours.		Refer to CoA C3	Conformance
4.2.1 Construction Traffic and Pedestrian Management Plan				
	Providing route options for approaching and departing traffic including for school peak periods		Refer to CoA B21	Conformance
	Providing site access points		Refer to CoA B21	Conformance
	Procedures for vehicles entering and exiting the site to prevent queuing; swept path analysis and no stopping zone.		Refer to CoA B21	Conformance
	Designated site parking for workers		Refer to CoA B21	Conformance

Section	Requirement	Evidence to be collected	Response/Findings/Recommendations	Conformance Status
	Truck driver code of conduct		Refer to CoA B20	Conformance
	Mitigate impacts including: - encouraging carpooling - limiting HV use of Burroway Road during school pickup/drop-off periods covering loads - delivery during standard hours - avoid idling near sensitive receivers - planning deliveries to reduce number of trucks arriving on site - scheduling all truck movements - drivers instructed to give way to pedestrians and cyclists - Conversion of Burroway Rd into contraflow lane operation to prevent impacts to Marina Square customers - traffic controllers to assist with trucks entering or leaving the site			Conformance
4.3 Noise and Vibration Management Plan				
	Localised barriers /hoarding to minimise noise emissions to primary school	Site inspection	There was no hoarding on site to minimise noise to the Primary School. It was noted however that no high noise activities were occurring at the time of the inspection. (Refer to Photos 13 and 14)	Conformance
	minimise number of trucks running simultaneously	Site inspection	Refer to CoA B21	Conformance
	selection of quiet muffled equipment	Site inspection	No non-muffled equipment was observed on site	Conformance
	non-tonal reversing alarms, where feasible	Interview	RobertsCo advised that all plant on site is sourced from contractors so non-tonal alarms is not practical.	Conformance
	horns not used as signalling devices	Site inspection	Not observed on site	Conformance
	avoid dropping of materials in trucks from height	Site inspection	Not observed on site	Conformance
	monitoring of piling activities of complaints are received.	Site inspection	No complaints have been received	Not triggered
4.4 Construction Waste Management Plan				
	waste register including quantity, classification and validation of waste	To be sighted on site To review records	Refer to CoA B17	Conformance
	recycling and disposal information	Bingo Industries Waste Monthly Report	Records of recycling and disposal records were sighted.	Conformance
	confirmation of contamination status from validation results	Interim site validation report	Refer to C32-C35	Conformance
4.4.1	Excavated soil and stockpile management			
	fencing of work zones	Site inspection	The site is fenced and secured.	Conformance
	separate stockpiles for asbestos contamination	Site inspection	Not applicable. There were no asbestos stockpiles on site.	Not triggered
	stockpiles to be placed upon hdpe liner to prevent spread of contamination.	Site inspection	Stockpiles of PASS were placed on geofabric liner, not HDPE liner . (Refer to Photo 11)	Non-conformance
	sediment controls around stockpiles. Locate away from drainage lines	Site inspection	Sediment controls were not observed around stockpiles	Non-conformance
	cover stockpiles during rain or wind	Site inspection	PASS stockpiles were covered with geofabric (Refer to Photo 11)	Conformance
	separate topsoil stockpiles	Site inspection	Stockpiles were segregated. (Refer to Photo 11)	Conformance
	Stock pile slope not to exceed 2H:1V	Site inspection	Stockpile slopes were at angle of repose (Refer to Photo 11)	Non-conformance
	conformity assessment for waste concrete removed from the site	Site inspection	Separate waste concrete stockpiles were observed on site (Refer to Photo 11)	Conformance
	trenches backfilled with insitu material or certified VEMN.	Site interview	RobertsCo confirmed that trenches backfilled with insitu material or certified VEMN.	Conformance
	Equipment hygiene within the site to prevent cross contamination	EHO Group Asbestos clearance inspection certificate RN 11890, dated 23/11/22	Asbestos clearance inspection certificate was provided as a sample for equipment hygiene practices for a dump truck following asbestos related work on site.	Conformance
4.5 Air Quality Management				
	water spraying of disturbed areas to prevent dust	Site inspection	Irrigation system for water sprays were observed on site	Conformance
	removal of mud from wheels and equipment to prevent tracking	Site inspection	Cattle grid in gravel bed was observed on site. It was observed however that the pavement street side of the cattle grid required maintenance. (refer to Photo 6)	Conformance
	clean up of public roads	Interview and site inspection	Conditions on the day of inspection were dry and no wind. Minor Tracking was observed from the sit (Refer to Photo 5). RobertsCo advise that a street sweeper is utilised when required.	Conformance
	covering or stabilisation of stockpiles	Site inspection	PASS stockpiles were covered with geofabric	Conformance
	stabilisation of ground likely to be exposed for significant period.	Site inspection	Refer to C20	Conformance
	power tools with dust collection devices	Interview and site inspection	Activities on site comprised civil works with limited use of power tools that generate dust.	Not triggered
	non-idling plant and equipment	Interview and site inspection	Activities on site comprised civil works with limited use of power tools that generate dust.	Not triggered

Section	Requirement	Evidence to be collected	Response/Findings/Recommendations	Conformance Status
	no excessive air emissions from plant and equipment	Interview and site inspection	Activities on site comprised civil works with limited use of power tools that generate dust.	Not triggered
	Cease work in the event of excessive dust. There must be not observable dust transport off-site	Site inspection	Excessive dust was not occurring at the time of the inspection	Conformance
	No dry cutting	Interview and site inspection	Activities on site comprised civil works with limited use of power tools that generate dust.	Not triggered
4.5.1	Asbestos Management			
	Workers in areas where ACM may be encountered must be inducted into the AMP and records kept	Interview Mainland Civil, Safer Work Method Statement for Removal of asbestos dated 26/09/22.	Site personnel were require to sign on to the SWMS	Conformance
	Regular audits of implementation of the AMP	interview	Asbestos works were supervised by Geosyntec	Conformance
4.5.2	Odour ground gas and vapour			
	Monitoring of all open excavations and remediated soils with PID and gas analyser	Geosyntec Consultants " Draft Validation Report - Sydney Olympic Park High School" dated 19 December 2022	Geosyntec draft validation report confirm collection of PID readings form the excavation of the mechanics pit (EX1), UST Location 2 (EX2), UST Location ! (EX3) and trenching works.	Conformance
4.6 Construction soil and water management plan				
	Implement erosion and sediment controls as per the blue book.	ESCP Site inspection	Erosion and sediment control plan was not effectively implemented: - Sediment trap was not installed - dirty water diversion drains leading to the sediment tram was not installed - connection to Council stormwater system was not installed - siltation fence along the boundary with Burroway Road was not correctly installed and ineffectual (refer to Photo 9 and 10) - sediment was observed in the gutters of Burroway Road adjacent to the site. (refer to Photo 4 and 5) - the ESCP was last updated in March 2022 and significant activity and profiling of the site has occurred since then. The ESCP required updating.	Non-conformance
4.7 Construction Flood and Emergency Management				
	Monitoring and worker awareness of flood risk	Aconex records	Copies of the CFEMP has been sent to contractors as standard tender documents	Conformance
	Evacuation drills at least twice per year	Site interview	No emergency drills had occurred on site, related to construction flood and emergency management	Non-conformance
	Prepare a flood emergency kit	Interview	RobertsCo confirmed that a flood emergency kit was located adjacent to the site first aid kit.	Conformance
	Steps for when a flood watch of flood warning is issued.	Site interview	The site monitors BOM for weather alerts including food.	Conformance
4.8 Acid Sulphate Soil Management Plan				
	Appointment of suitable person for managing ASS	Interview	RobertsCo engaged Mainland civil to manage PASS and Geosyntec to monitor activities	Conformance
	Daily attendance of consultant for sampling for PASS	Interview - up until a clearance certificate on site	Geosyntec attended the site on a daily basis when PASS activities were high however the site has been excavated and the foundation has been replaced with VENM. Contaminated materials such as asbestos are no longer encountered on a daily basis. Geosyntec attend the site when required.	Conformance
	Monitoring including: -soil(pH, lab testing SPOCAS, liming soil, onsite remediation or off site - water (storage of water on site, test prior to disposal)	Geosyntec Waste classification assessment report dated 22/12/22	A sample waste classification assessment report was sighted	Conformance
4.8.1	Surface water			
	Limiting extent of cleared area	Site inspection	Work has progress to cover the whole site. There was limited capacity to minimise clearing or rehabilitate at this stage of the work.	Conformance
	HDPE sheeting under stockpiles	Site inspection	Stockpiles of PASS were placed on geofabric liner.	Non-conformance
	silt fences/hay bales to minimise sedimentation.	Site inspection	- siltation fence along the boundary with Burroway Road was not correctly installed and ineffectual (refer to Photo 9 and 10) - sediment was observed in the gutters of Burroway Road adjacent to the site. (refer to Photo 4 and 5) .	Non-conformance
	protection of existing drains	Site inspection	as above	Non-conformance
4.8.2	Ground water management and dewatering			
	minimise depth of dewatering	Interview	RobertsCo advised that no ground water was encountered.	Not triggered

Section	Requirement	Evidence to be collected	Response/Findings/Recommendations	Conformance Status
	approval for groundwater disposal	Interview	RobertsCo advised that no ground water was encountered.	Not triggered
	pH tested and neutralisation assessment	Interview	RobertsCo advised that no ground water was encountered.	Not triggered
	ongoing ground water monitoring	Interview	RobertsCo advised that no ground water was encountered.	Not triggered



APPENDIX D – AGENCY CONSULTATION

SSD 8873789	Independent Environmental Audit – Epping South Public School	16/02/2022
55211240	School Infrastructure NSW	Rev 1

Maurice Pignatelli

From: Maurice Pignatelli
Sent: Monday, 27 February 2023 11:25 AM
To: Damien.Smith@dpie.nsw.gov.au
Cc: Marco Amorelli
Subject: FW: SSD 11802230 Sydney Olympic Park new high school - Independent Audit

Hi Damien
Will do thank you.

Kind Regards
Maurice

From: Damien Smith <Damien.Smith@dpie.nsw.gov.au>
Sent: Monday, February 27, 2023 11:07 AM
To: Marco Amorelli <Marco.Amorelli@au.ey.com>
Subject: RE: SSD 11802230 Sydney Olympic Park new high school - Independent Audit

You don't often get email from damien.smith@dpie.nsw.gov.au. [Learn why this is important](#)

Hi Maurice,

Apologies for the delay.

The Department does not require any additional matter to be included in the Audit beyond what is required by the Independent Audit Post approval requirements, May 2020 and the conditions of the consent.

Generally NSW Planning requests that consultation is requested three (3) weeks prior to the commencement of the audit. In future please consult with NSW planning 3 weeks prior to commencing the Audit.

If you have any questions or would like to discuss this matter please feel free to contact me.

Best Regards

Damien Smith
Senior Compliance Officer – Government Projects

Planning & Assessment | Department of Planning and Environment
T 02 9995 6289 | **M** 0403 291 191 | **E** damien.smith@dpie.nsw.gov.au
Locked Bag 5022 | PARRAMATTA NSW 2124
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Please direct all email correspondence to compliance@planning.nsw.gov.au



**Planning,
Industry &
Environment**

The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our

work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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

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

From: Maurice Pignatelli
Sent: Thursday, 9 February 2023 11:10 AM
To: compliance@planning.nsw.gov.au
Cc: Marco Amorelli <Marco.Amorelli@au.ey.com>; alistair.smith@atkinsglobal.com
Subject: SSD 11802230 Sydney Olympic Park new high school - Independent Audit

Attention: Damien Smith

Hi Damien

Further to our brief discussion this morning, as the approved lead auditor for SSD 11802230 Sydney Olympic Park new high school - Independent Audit, I write to advise that the audit for the above development commenced on 17/1/23 and the first interview was conducted on 8/2/23. The audit will be conducted in accordance with the Auditor Guideline, Independent Audit Post approval requirements, May 2020.

I also seek to consult with the Department, as required by Section 3.2 of the guideline, specifically in relation to:

- Any particular area of focus for the audit
- Any consultation with agencies deemed necessary by the Department.

I will be conducting my second interview with the development on 16/2/23. Feedback from the Department prior to 16/2/23 would be greatly appreciated.

Maurice Pignatelli
Director
Certified Lead Environmental Auditor

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OptimE Pty Ltd
Optimising Environmental Assurance



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APPENDIX E – INDEPENDENT AUDIT DECLARATION FORM

SSD 8873789	Independent Environmental Audit – Epping South Public School	16/02/2022
55211240	School Infrastructure NSW	Rev 1

Appendix D – Declaration of Independence Form Template

Declaration of Independence - Auditor

Project Name:	<i>Sydney Olympic Park High School (SOPHS)</i>
Consent Number:	<i>SSD-11802230</i>
Description of Project:	<i>Construction and operation of a new high school</i>
Project Address:	<i>Lot 1 DP 1276305, 7 Burroway Road, Wentworth Point</i>
Proponent:	<i>Department of Education</i>
Date:	<i>12 December 2022</i>

I declare that:

- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse¹, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest 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;
- iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I 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.

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

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

Name of Auditor:	<i>Maurice Pignatelli</i>
Qualification:	<i>BE(Civil). MEng.Sc. Exemplar Global Lead Environmental Auditor</i>
Company:	<i>OptimE Pty Ltd</i>
Signature:	



Note 1:

My spouse has been an employee of the Department of Education for over 30 years. She is currently the Director of the School Leadership Institute, within the Department. She has had no involvement in any aspects of this project and will not have future involvement of any aspects of its delivery or operation.