



INDEPENDENT ENVIRONMENTAL AUDIT #3 – CONSTRUCTION OF THE NEW WENTWORTH POINT HIGH SCHOOL

SSD-11802230



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Executive Summary

The Department of Education (DoEd) - School Infrastructure NSW (SINSW) commissioned AtkinsRéalis, trading as SNC-Lavalin Australasia to undertake an Independent Environmental Audit (IEA) for the construction of a new high school, Wentworth Point new 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 third IEA, undertaken as part of an audit program in accordance with Table 3 of the IAPAR.

The previous audit covered the period up to 23 July 2023. This audit covers the period from 24 July 2023 to 23 January 2024.

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 then Department of Planning and Environment (DPE), now Department of Planning, Housing and Infrastructure (DPHI), via email to seek input as required by Section 3.2 of the IAPAR. DPHI did not require any additional matter to be included in the Audit. DPHI 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.

One non-compliance was recorded by this audit. The non-compliance occurred as the Project did not make the second independent audit report, and response to it, publicly available within 60 days of submission to the Planning Secretary, as required by Condition C39(c).

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 substantial conformance against the CEMP and sub-plans.



Three observations of concern were raised. These were related to:

- Waste management and litter on site
- The incorrect placarding of hazardous substances at one location
- Flood and emergency management evacuation drills.

A high-level assessment of the Project's actual impacts against the predicted impacts as detailed in the Environmental Impact Statement (EIS) (Section 9 – Risk assessment) was also undertaken. The project generally demonstrated actual impact which was “consistent” with, or “lower” than, the EIS predicted impact. These are addressed in Section 4.3 of this report.

Recommendations

The previous audit made four (4) recommendations to address the observations of concern raised. All recommendations raised by the previous audit were closed out.

This audit made four (4) recommendations to address the non-compliance and observations of concern. These were:

- | | |
|--------------|--|
| WPHS-03 R-01 | Include the requirements of Condition C39(c) into the Project's compliance program to ensure future independent audit reports, and responses to them, are publicly available within 60 days of their submission to the Planning Secretary. |
| WPHS-03 R-02 | Manage waste bins so they are emptied and replaced before they become a litter nuisance. Clean-up litter around the site. |
| WPHS-03 R-03 | Install correct hazardous substances placarding to hazardous substances storages. |
| WPHS-03 R-04 | Undertake a flood and emergency drill and re-establish the 6 monthly program until completion of construction. |



1. Introduction

1.1 Background

The Department of Education (DoEd) – School Infrastructure NSW (SINSW) commissioned AtkinsRéalis, trading as SNC-Lavalin Australasia to undertake an Independent Environmental Audit (IEA) for the construction of a new high school, Wentworth Point new 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 findings of the third IEA, undertaken as part of an audit program in accordance with Table 3 of the IAPAR.

1.2 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 (SSD) Application 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 new High School (the Project).

1.3 Project Location and Site 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.

The site forms part of the Wentworth Point Planned Precinct, which was rezoned in 2014 for the purposes of high density residential, public recreation, school and business purposes. The location of the school site is shown in Figure 1.



Figure 1 – Location Map

(Source: EIS for Sydney Olympic Park new high school (SSD 11802230) prepared by Mecone NSW Pty Limited)

1.4 Construction Activity

Construction started on the Project on 31 October 2022 with site establishment and remediation work. During this audit period, earthworks and structural building works had been substantially completed. Cladding, finishes and fit-out were underway. Figure 2 presents an aerial view of the development in January 2024.



Figure 2 – Aerial view of the Development (February 2024)

(Source: The Project)

1.5 Audit Team

The audit team approved by the former DPE (now DPHI) to undertake the IEA is detailed in Table 1. Refer 5.Appendix A for DPE Approval Letter dated 17 January 2023.

Table 1: Audit Team

Role	Name	Qualifications & Experience
Lead Environmental Auditor	Maurice Pignatelli	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 has extensive experience in statutory roles required by DPHI 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.

1.6 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
- recommend any appropriate measures to improve environmental performance of the Project.

1.7 Audit Scope

The audit was undertaken in accordance with the requirements of the Conditions of Approval (CoA) of Development Consent SSD-11802230 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.

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 1, 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 1.5, 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 1.8
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 agree by the Planning Secretary.	This requirement is triggered after the audit report is finalised.
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	This requirement is triggered after the audit report is finalised.

	Approval Requirements unless otherwise agreed by the Planning Secretary.	
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

Table 3: Scope requirements IPAR

Scope requirement	Where addressed
Independent Audit PAR (DPIE, 2020)	This document
Development Consent (SSD 8873789)	Sections 3.1, 3.2, 3.3 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:	
Actual impacts compared with predicted impacts in the Environmental Impact Statement (EIS)	Section 4.3
Physical extent of the development in comparison with the approved boundary, and any potential off-site impacts	Section 3.5 Section 4.3
Incidents, non-compliances and complaints	Section 3.6, 3.7, 3.8
Performance of the development, with regard to agency policy and environmental issues identified during consultation when developing the scope of the audit	Section 4.2 Appendix C, Table C2
Feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project	Section 2.5 Appendix D
A high-level assessment of whether Environmental Management Plans and sub-plans are adequate.	Section 4.1 Appendix C, Table C2

1.8 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 5 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. The initial independent construction audit covered the period from 31 October 2022 to 23 January 2023.

The second independent construction audit for the Project covered the period from 24 January 2023 to 23 July 2023.

This IEA represents the third independent construction audit for the Project. It covers the period from 24 July 2023 to 23 January 2024.



2. Audit Methodology

2.1 Development of Audit Scope

The scope of this IEA was focussed on Development Consent conditions applicable to construction works undertaken during the reporting period.

The audit scope was developed in consultation with proponent's representatives to determine the applicability of Development Consent conditions to construction works undertaken.

The former DPE (now DPHI) was also consulted regarding areas of particular focus.

2.2 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.
- Consultation with the former DPE (now DPHI) on areas of focus for the audit, and agencies to be consulted.
- 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, interviews and walk-through site inspection.
- 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.

2.3 Proponent's Representatives

The proponent's representatives for this project were:

- School Infrastructure NSW - Proponent
- Ernst and Young – Project Managers
- RobertsCo - Principal Contractor

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

- Shane Lee – DoEd, SINSW – Assistant Project Director, Delivery
- Marco Amorelli – Ernst and Young – Senior Project Manager
- Adam Zong – Ernst and Young – Project Manager
- Adam Greentree - RobertsCo – Project Manager

The individuals noted attended the audit opening and closing meetings. The proponent's responses were coordinated by the Senior Project Manager who sought input from relevant project personnel to provide evidence into the Project's compliance at different stages during the audit.

2.4 Site Inspection

A walk-through site inspection was undertaken by the Auditor on 24 January 2024. During the site inspection, environmental controls on-site generally appeared to be operating effectively.

Refer to Appendix B for site photographs.

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

2.5 Consultation with Agencies

The Auditor consulted with the former DPE (now DPHI) via email on 12 December 2023 to seek input, as required by Section 3.2 of the IAPAR, specifically in relation to:

- Any particular area(s) of focus for the audit, and
- Any consultation with agencies deemed necessary by the Department.

On 12 February 2024, the DPHI Senior Compliance Officer confirmed there were no specific areas of concern for the audit scope from NSW Planning.

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



2.6 Compliance Descriptors

The compliance status of each 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.



3. Audit Findings

3.1 Audit Findings Summary

Table 6 summarises the audit findings.

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	51	Appendix C, Table C1
Non-compliant	1	Appendix C, Table C1
Not triggered	122	Appendix C, Table C1
Other		
Non compliances recorded (by the project) during the audit period	0	Section 3.6
Complaints reported during audit period	0	Section 3.7
Incidents recorded during the audit period	0	Section 3.8

3.2 Compliance

An assessment of compliance was undertaken against the Development Consent conditions applicable to site works 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 2.6 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	11	0	26
Schedule 2, Part B – Prior to commencement of construction	37	11	0	26
Schedule 2, Part C – During construction	43	29	1	13
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

SSD Requirement	No. of conditions	Findings		
		Compliant	Non-compliant	Not triggered
Total	174	51	1	122

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.

3.3 Non-Compliances

One non-compliance was recorded by this audit. The non-compliance occurred as the Project did not make the second independent audit report, and response to it, publicly available within 60 days of submission to the Planning Secretary, as required by Condition C39(c). The documents were due to be uploaded onto the Project website before 28 October 2023, however advice from the Project was that the documents were uploaded on 8 or 9 November 2023.

No verifiable record was available to confirm the documents were uploaded onto the Project website before 28 October 2023, hence on the balance of information available, a non-compliance was awarded.

Recommendation WPHS-03 R-01 has been raised to address this non-compliance. Refer to Table 10 of this report.

3.4 Previous Audit Actions (WPHS-02)

The previous audit (WPHS-02) made four (4) recommendations to address non-compliances and observations of concern raised during that audit. Table 8 below presents the status of the recommendations raised during the previous audit.

Table 8: Status of recommendations identified during the previous audit period

Non-compliance NC # Observation Obs #	Recommendation (WPHS- 02/R#)	Status of WPHS- 02/R#
WPHS-02 NC- 01	No recommendation was warranted.	N/A
WPHS-02 Obs-01	WPHS- 02/R01 Ensure that all plans and records on the webpage are up to date.	CLOSED The plan and records on the website were updated.
WPHS-02 Obs-02	WPHS- 02/R02 Update the CWMSP to include a procedure to ensure all the waste records required by Condition B17 will be consistently recorded for the duration of the project.	CLOSED A sample waste register was appended to CWMSP as a guide to the records to be maintained by the project.
WPHS-02 Obs-03	WPHS-02/R03 Update the CSWMP to include (append): <ul style="list-style-type: none"> qualifications of the experts that prepared the plan. 	CLOSED The CSWMP was updated to include the qualifications of the experts that prepared the plan and updated consultation with Council (in relation to the new plan).

Non-compliance NC # Observation Obs #	Recommendation (WPHS- 02/R#)	Status of WPHS- 02/R#
	<ul style="list-style-type: none"> updated consultation with Council (in relation to the new plan). 	
WPHS-02 Obs-04	WPHS-02/R04 Install stormwater controls along the northern boundary of the site to: <ul style="list-style-type: none"> prevent stormwater runoff from upgradient areas from entering the site. prevent stormwater runoff, potentially sediment laden, from leaving the site. 	CLOSED Stormwater controls along the northern boundary of the site were rectified.

3.5 Physical Extent of the Project

The Crown Certificates CC1, CC2 and CC3 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.

3.6 Non-Compliances Recorded by the Project

No non-compliances were recorded by the Project during the audit period.

3.7 Complaints

A complaints register was maintained by the Project for the audit period. The register was publicly available in the project website:

https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/w/wentworth-point-new-high-school/2024/feb/B9_WPNHS_Complaints_Register_January_2024.pdf

No complaints were recorded by the Project during the audit period.

3.8 Incidents

No environmental incidents were recorded by the Project during the audit period.

4. Audit Findings – Discussion

4.1 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 management plans were updated during the reporting period to address observations during the previous audit. The management plans were found to substantively meet the requirements of the Development Consent.

4.2 Review Environmental Performance

The Project's implementation of the management plans is provided in this section. The overall standard of environmental management on site was high. The detailed assessment against the CEMP and associated sub-plan is provided in Appendix C, Table C2. Based on site observations and records provided, the Project 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 scheduling of trucks to the site, consultation with sensitive receivers, and general noise mitigation measures on site.
- Waste records were maintained in a register.
- Fuels in package containers on site were appropriately stored.
- Dust controls were effectively implemented.
- Erosion and sediment controls were effectively implemented.

One “notable practice” was observed on site. The project had implemented an innovative paint brush and roller washing system. A modified 200L drum was attached to a water supply and it contained the resultant wash water with paint residue, which would otherwise be disposed in a sink of the new development or on the ground. Refer to Appendix B, Photo 15.

There were a number of housekeeping issues that would further reduce environmental risk of the project. These were related to:

- Co-mingled waste bins on site were overfilled and had the potential to generate wind-blown litter. Waste cardboard was observed around the Bingo bins. Refer to Appendix B, Photo 11.
- Incorrect signage (Class 2) on the hazardous substances cage should be removed and updated to correctly label the contents of the cage (Class 3). Refer to Appendix B, Photo 16.
- Flood and emergency management evacuation drills have not been undertaken at least twice per year. A drill was last undertaken on 24 February 2023. Refer to Appendix C, Table C2, Section 4.7.

4.3 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>	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 four days. For this audit period, RobertsCo estimated truck movement were as follows: <ul style="list-style-type: none"> • Average of 10 heavy rigid vehicle daily. The impact of heavy vehicle movements is likely to be consistent with that predicted in the EIS.
	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, however the off-street parking is often full and construction workers are also required to park on the street as noted in the EIS. The impact of construction parking on local roads is likely to be consistent with that 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>	Noise monitoring undertaken during January to May 2023, confirmed that no exceedance event, attributable to the project, was 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 was addressed during the first audit period. The impact of contamination during this audit period is likely to be lower than 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>	The site implements its Construction Soil and Water Management Plan and had effectively implemented its Erosion and Sediment Control Plan. Minor sediment was observed in the gutter to Burroway Road adjacent to the site, indicating that sediment controls were effective at the time of the inspection. On this basis the impact of sediment and erosion is likely to be consistent with that predicted in the EIS.
Social impact	Noise impacts during Construction <i>Level of Impact: Medium</i> <i>Residual: Low</i>	See noise and vibration above.



5. Recommendations

The audit found that the project was generally complying with the SSD conditions of approval and the CEMP and Sub-Plans.

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 IAPAR, 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 were raised. Please refer to this reference for context.

Table 10: Recommendations identified during the audit period

Report Reference	Non-compliance (NC#) Observations of concern (Obs#)	Recommendation (WPHS-02/R#)
Appendix C Table C1, Condition C39(c)	WPHS-03 NC-01 The Project did not make the second Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary.	WPHS-03 R-01 Include the requirements of Condition C39(c) into the Project's compliance program to ensure future independent audit reports, and responses to them, are publicly available within 60 days of their submission to the Planning Secretary.
Section 4.2	WPHS-03 Obs-01 Co-mingled waste bins on site were overfilled and had the potential to generate wind-blown litter.	WPHS-03 R-02 Manage waste bins so they are emptied and replaced before they become a litter nuisance. Clean-up litter around the site.
Section 4.2	WPHS-03 Obs-02 Class 2 placarding was observed on a hazardous substances cage that contained Class 3 substances.	WPHS-03 R-03 Install correct hazardous substances placarding to hazardous substances storages.
Appendix C Table C2, Section 4.7	WPHS-03 Obs-03 Construction flood and emergency drills have not been undertaken at least twice per year.	WPHS-03 R-04 Undertake a flood and emergency drill and re-establish the 6 monthly program until completion of construction.

APPENDICES



Appendix A. Planning Secretary Audit Team Agreement



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

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". The signature is stylized, with a large, circular flourish at the end.

Rob Sherry
Team Leader Compliance - Government Projects
Compliance

As nominee of the Planning Secretary

Maurice Pignatelli

From: Damien Smith <Damien.Smith@dpie.nsw.gov.au>
Sent: Monday, 12 February 2024 10:58 AM
To: Maurice Pignatelli
Subject: RE: SSD 11802230 Sydney Olympic Park new high school - Independent Audit #3

Good Morning Maurice,

Thank you for the below email regarding the independent audit of the Sydney Olympic Park new high school SSI-11802230 (the **Consent**).

The Department does not require any additional issues for including within the scope of the Audit that are not already captured by the Consent, and the Department's Independent Audit Post Approval Requirements (May 2020).

If you have any questions or concerns regarding the above please feel to contact me.

Best Regards

Damien Smith
Senior Compliance Officer – Government Projects

Planning & Assessment | Department of Planning, Housing and Infrastructure
T 02 9995 6289 | M 0403 291 191 | E damien.smith@dpie.nsw.gov.au
Locked Bag 5022 | PARRAMATTA NSW 2124
www.dpie.nsw.gov.au



The Department of Planning, Housing and Infrastructure acknowledges the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please note that I work flexibly. I'm sending this message now because it's a good time for me, but I don't expect that you will read, respond to or action it outside of your own regular hours.

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](#).

Our Vision: Together, we create thriving environments, communities and economies

From: Maurice Pignatelli <maurice@optimenv.com.au>
Sent: Friday, 9 February 2024 1:43 PM
To: Damien Smith <Damien.Smith@dpie.nsw.gov.au>; DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc: 'Marco Amorelli' <Marco.Amorelli@au.ey.com>; 'Smith, Alistair' <Alistair.Smith@atkinsrealis.com>; Shane Lee <shane.lee28@det.nsw.edu.au>
Subject: RE: SSD 11802230 Sydney Olympic Park new high school - Independent Audit #3

Hi Damien

Just closing the loop to see whether you had any comments for this audit. The invitation was sent prior to Christmas so it may have been missed during the Christmas rush. The audit interview and inspection were undertaken on 24.1.24 but there is still time to consider/investigate any comments/concerns you may have prior to finalising the report.

Kind Regards
Maurice

Maurice Pignatelli
Director
Certified Lead Environmental Auditor

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W: www.optimenv.com.au

OptimE Pty Ltd
Optimising Environmental Assurance



From: Maurice Pignatelli
Sent: Tuesday, December 12, 2023 2:57 PM
To: Damien Smith <Damien.Smith@dpie.nsw.gov.au>; compliance@planning.nsw.gov.au
Cc: Marco Amorelli <Marco.Amorelli@au.ey.com>; Smith, Alistair <Alistair.Smith@atkinsrealis.com>; Sherwin Rasquinha <sherwin.rasquinha1@det.nsw.edu.au>
Subject: SSD 11802230 Sydney Olympic Park new high school - Independent Audit #3

Hi Damien

As the approved lead auditor for SSD 11802230 Sydney Olympic Park new high school - Independent Audit #3, I write to advise that the audit interview for the above development is proposed to be conducted on 18 January 2024.

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.

Feedback from the Department prior to 12 January 2024 would be greatly appreciated. I appreciate this is over the Christmas period so I would be happy to work with a more suitable timeframe if the 12/1/24 does not work for you.

Kind Regards

Maurice Pignatelli
Director
Certified Lead Environmental Auditor

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Appendix B. Site Inspection Photographs



Appendix B – Site photographs

Photo 1: Aerial photo of the site (January 2024).

- The earthworks had substantially been completed
- Structural building works had substantially been completed.
- Cladding, finishes and fit-out was underway.



Photo 2: Signage in accordance with the Approval.



Photo 3: The western side (active side) of the site, commencing from the main driveway, had been substantially sealed with concrete to minimise tracking and dust.



Photo 4: A rumble grid was located at the heavy vehicle exit for the site, embedded within a concrete driveway and free of sediment. A water hose was also present to wash down vehicles, as required, before they exit the site.



Photo 5: 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.

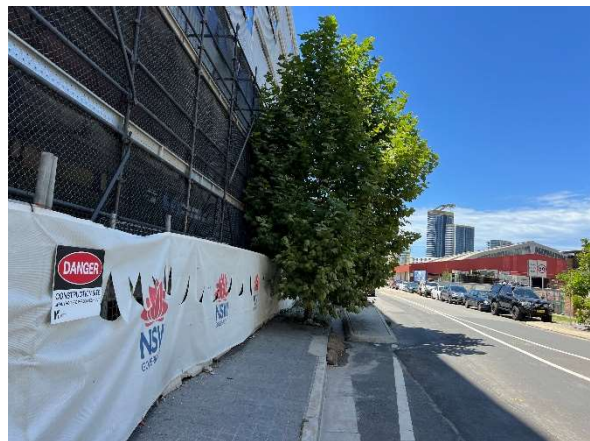


Photo 6 and 7: The exit point to the site onto Burroway Road was free of tracked sediment. Minor tracking of dust was observed onto public roads but this was considered negligible.

Gutters along Burroway Road were protected by coir logs and a small quantity of sediment had accumulated at the controls.



Photo 8: The large capacity stormwater channel along the western boundary continued to operate effectively.



Photo 9: A stockpile of Excavated Natural Material (ENM) was covered in geofabric to reduce potential for erosion and dust.



Photo 10 and 11: The Bingo skips contained co-mingled waste.

Co-mingled waste bins on site were overfilled and had the potential to generate wind-blown litter. Waste cardboard was observed around the Bingo bins. Refer to WPHS-03/Obs-01.



Photo 12: The stormwater sump on the eastern side of the building continued to operate. The sump was located at a low point and serves to capture stormwater and reduce surface water from the work area.

A riser had been installed to allow pump-out of the collected water to liquid waste.



Photo 13: A tree protection zone had been established since the commencement of the project.



Photo 14: Concrete waste (agitator wash-out) skips were located on site and observed to be used.

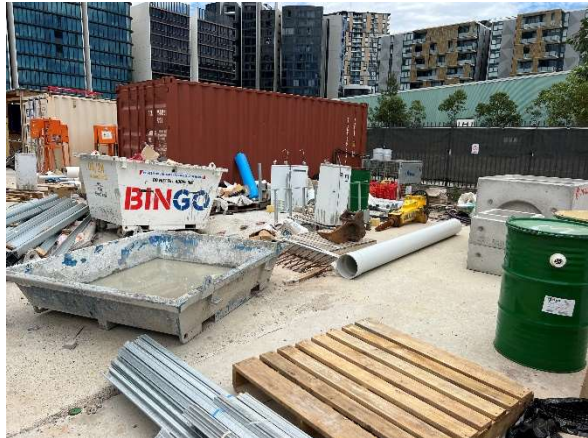


Photo 15: An innovative paint brush and roller washing drum had been established to prevent painters from cleaning paint equipment in sinks within the new building or upon the ground.

The resultant wastewater was proposed to be removed from site as liquid waste.

This was identified as a notable practice.



Photo 16: Containers of fuel were stored in a lockable cabinet, under cover and banded.

A Class 2 hazardous substances placard was displayed however the cage contained Class 3 material. Refer to WPHS-03/Obs-02.



Appendix C. Audit Tables



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	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.	Compliant
Terms of Consent				
A2	The development may only be carried out:			
	(a) in compliance with the conditions of this consent;	Crown Certificate 3 (CC3) - Sydney Olympic Park New High School (SOPHS) dated 20 September 2023	The Crown Certificate (CC3) - prepared by Jensen Hughest confirmed that the facade, fitout and landscape works is consistent with BCA . CC3 is issued in accordance with Section 6.28 (2) of the EP&A Act 1979 and relates to plans and specifications referred to Attachments A & B. Attachment A of CC3 makes reference to the DC SSD-11802230.	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 Report; and		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.	Crown Certificate 3 (CC3) - Sydney Olympic Park New High School (SOPHS) dated 20 September 2023	The Crown Certificate (CC3) - prepared by Jensen Hughest confirmed that the facade, fitout and landscape works is consistent with BCA . CC3 is issued in accordance with Section 6.28 (2) of the EP&A Act 1979 and relates to plans and specifications referred to Attachments A & B. Attachment A of CC3 makes reference to the DC SSD-11802230.	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.	DPE letter dated 19/12/23 - DPE response to the Project's response to the IEA (Audit 1)	DPE review dated 19 December 2023, acknowledged receipt of the revised plans associated with the previous IEA. No further actions were requested by the Department.	Compliant
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.	DPE letter dated 21/6/23 - DPE response to the Project's response to the IEA (Audit 1)	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				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
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				
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.	Refer to Conditions B15, B16 and B18 CNVMP Rev1.6 dated 13/2/23. SWMP Rev 02 dated 22/05/23.	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. This audit confirmed that the following sub-plans were updated with consultation records: - CNVMP Rev1.6 dated 13/2/23. - SWMP Rev 02 dated 22/05/23. OBSERVATION OF CONCERN WPHS-01/Obs-01 from the previous audit has been closed.	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
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

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
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				
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 and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development.	Crown Certificate 3 (CC3) - Sydney Olympic Park New High School (SOPHS) dated 20 September 2023	The Crown Certificate (CC3) - prepared by Jensen Hughest confirmed that the facade, fitout and landscape works is consistent with BCA . CC3 is issued in accordance with Section 6.28 (2) of the EP&A Act 1979 and relates to plans and specifications referred to Attachments A & B. Attachment A of CC3 makes reference to the DC SSD-11802230	Compliant
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.	Crown Certificate 3 (CC3) - Sydney Olympic Park New High School (SOPHS) dated 20 September 2023	The Crown Certificate (CC3) - prepared by Jensen Hughest confirmed that the facade, fitout and landscape works is consistent with BCA . CC3 is issued in accordance with Section 6.28 (2) of the EP&A Act 1979 and relates to plans and specifications referred to Attachments A & B. Attachment A of CC3 makes reference to the DC SSD-11802230.	Compliant
Applicability of Guidelines				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
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
Access to Information				
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/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 and audit responses - up to date CEMP and sub-plans	Compliant
Compliance				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
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, June 2023.	<p>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).</p> <ul style="list-style-type: none"> - Emergency evacuation - Traffic Control Plans - Environmental Controls - Wentworth Primary School (Children) - Complaints process <p>An extract of the RobertsCo Wentworth Point induction register was sighted during previous audits confirming that records were maintained of personnel (including contractors) inducted.</p>	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 the applicant	There have been no non-compliances during this audit period.	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.		Refer to Condition A28	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.	No incidents were reported.	Not triggered
Revision of Strategies, Plans and Programs				
A31	<p>Within three months of:</p> <p>(a) the submission of a compliance report under condition A27;</p> <p>(b) the submission of an Independent Audit under condition C36 or C38;</p> <p>(c) the approval of any modification of the conditions of this consent; or</p> <p>(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.</p>	<p>DoE Letter dated 28/08/23 Doc23/11413266. titled Conditions of Consent A31- review of strategies, plans and programs</p> <p>DoE Letter dated 8/12/23 Doc23/1690871. titled Conditions of Consent A31- review of strategies, plans and programs</p>	<p>The second IEA was submitted to DPE on 28 August 2023. The accompanying DoE response notified the Department that a review of the plans was being carried out, within the three month period.</p> <p>The project formally notified DPE that the Plans had been updated on 8/12/23 and copies of the revised plans were submitted</p>	Compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
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>	Email dated 14/12/23 between Schools Infrastructure and Project Manager EY confirmed the management plans were submitted with the covering letter to DPE. Construction Environmental Management Plan AU122229 CEMP FINAL R01 dated 21 June 2023 Construction Noise and Vibration Management Plan Rev 1.6 dated 13/2/23 Waste Management Plan dated 9/10/23 Construction Soil and Water Management Plan dated 9/10/23	Email dated 14/12/23 between Schools Infrastructure and Project Manager EY confirmed the nominated management plans were submitted with the covering letter to DPE.	Compliant
Burroway Road Drop off / Pickup facilities				
A33	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: (a) the number of vehicles using the drop-off/pick-up facilities throughout the morning and afternoon drop-off/pick-up peak periods; (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; (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; (d) typical dwell time (length of stay) of vehicles within the drop-off/pick-up facilities; and (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.		The site was not operational.	Not triggered
A34	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 report must: (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; (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 Road; and		The site was not operational.	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	<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>			
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.	Written response by Project Manager to audit questionnaire.	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				
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).	<p>DoE letter DOC21/829169 dated 19/05/23 - Approval request in accordance with Condition A37.</p> <p>DPE letter (undated) - Documents titled SSD 11802230-A37-Design Modification, Approval letter A37 and Drawing SOPHS - WB - AR - 53 - 00 - -01 Rev C dated 18 May 2023.</p>	DoE submitted a design modification to DPE for approval on 17/5/23. DPE approved design modification as per Condition A37 (undated)	Compliant
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.		Closed-out during the previous audit	Not triggered
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.		Closed-out during the previous audit	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.		Addressed during the previous audit.	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
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.	<p>Woods Baggot letter dated 28/6/23 Sydney Olympic High School Facade</p> <p>Crown Certificate 3 (CC3) - Sydney Olympic Park New High School (SOPHS) dated 20 September 2023</p> <p>SOPHS Design certification by Ausrise Facades dated 3/8/23.</p> <p>SOPHS - Façade Structural Certification by HACO Consulting Engineers letter dated 11/8/23</p> <p>Department of Planning Major Project Portal receipt for Schedule 2 condition B4 dated 25 September 2023.</p> <p>SINSW letter dated 22 September 2023 titled Sydney Olympic Park new high school project (SSD11802230: Submission in accordance with Condition B4.</p>	<p>Woods and Bagot confirmed 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"</p> <p>The Crown Certificate (CC3) - prepared by Jensen Hughest confirmed that the facade, fitout and landscape works is consistent with BCA .</p> <p>CC3 is issued in accordance with Section 6.28 (2) of the EP&A Act 1979 and relates to plans and specifications referred to Attachments A & B. Attachment A of CC3 makes reference to the DC SSD-11802230 and documentation sighted including facade documentation.</p> <p>SINSW submitted the package accepted by the certifier (dated 20/9/23) to DPE on 25/9/23. That is within 7 days after the certifier accepts it.</p>	Compliant
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:...		Closed-out during the previous audit	Not triggered
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.		Closed-out during the previous audit	Not triggered
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.		Closed-out during the previous audit	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:...		Closed-out during the previous audit	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.		Closed-out during the previous audit	Not triggered
	The Community Communication Strategy must: ...		Closed-out during the previous audit	Not triggered
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: ...		Closed-out during the previous audit	Not triggered
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).		The project advised that Public Domain design is ongoing. A lighting concept design has currently been completed by an Electrical Design Consultant. This condition was not triggered during the reporting period.	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 Construction Environmental Management Plan AU122229 CEMP FINAL R01 dated 21 June 2023	The previous audit confirmed the CEMP broadly met the requirements of the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). It is further noted that the CEMP was updated on 21 June 2023. 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: ...	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	The previous audit confirmed the CEMP broadly complies with this condition. RobertsCo correspondence confirmed that the CEMP was submitted to the Certifier for approval. It was 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 was raised by the previous audit as there had been no high level independent review of the CEMP and supporting plans for this Project. In response to this observation, the DPE did not specify any further action by the proponent hence this observation has been closed.	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
B15	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: ...		Closed-out during the previous audit	Not triggered
B16	The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced noise expert; (b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); (c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; (d) include strategies that have been developed with the community for managing high noise generating works; (e) describe the community consultation undertaken to develop the strategies in condition B16(d);	Wentworth Point new High School, Construction Noise and Vibration Management Plan dated 27 September 2022. Construction Noise and Vibration Management Plan Rev 1.6 dated 13/2/23	The previous audit confirmed the CNVMP broadly complies with this condition with the exception of: - qualifications of the personnel preparing the plan - include details of consultation undertaken with the community and agreed strategies to manage high noise generating works. An update of the plan dated 13/2/23 addresses both of these requirements in Section 8 and an Appendix respectively. NON COMPLIANCE WPHS01/NC-02 has been closed.	Compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	(f) include a complaints management system that would be implemented for the duration of the construction; and (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.			
B17	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following: (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; and (c) confirmation of the contamination status of the development areas of the site based on the validation results.	Wentworth Point new High School, Waste Management Plan dated 9/10/ 2023 DPE letter SSD-11802230-PA-19 Sydney Olympic Park New High School (SSD-11802230) Revised Construction Environmental Management Plan (CEMP) and Sub-Plans, Condition A32 dated 19/12/23	This condition was addressed in the previous audit with the exception of Observation of Concern WPHS-02/Obs-02 which stated that the updated CWMSP does not include a procedure to ensure all the waste records required by Condition B17 will be consistently recorded for the duration of the project. To address this issue the applicant appended a template of the Bingo waste register used record the data. DPE acknowledged receipt of the revised plan on 19/12/23 and raised no further issues.	Compliant
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: a) be prepared by a suitably qualified expert, in consultation with Council; (b) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; (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'; (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; (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; (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) (g) detail all off-site flows from the site; and (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.	CEMP Appendix G - Construction Soil and Water Management Plan dated 9/10/23. DPE letter SSD-11802230-PA-19 Sydney Olympic Park New High School (SSD-11802230) Revised Construction Environmental Management Plan (CEMP) and Sub-Plans, Condition A32 dated 19/12/23	This condition was addressed in the previous audit with the exception of Observation of Concern WPHS-02/Obs-03. To address this issue the applicant, the CSWMP was updated to include: - qualified expert that prepared the ESCP. The expert that prepared the CSWMP was not documented. - details of consultation with Council. DPE acknowledged receipt of the revised plan on 19/12/23 and raised no further issues.	Compliant
B19	The Construction Flood Emergency Management Sub-Plan must address, but not be limited to, the following: ...		This condition was addressed in the previous audit	Compliant
B20	A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following: ...		This condition was addressed in the previous audit	Not triggered
Construction Worker Transportation Strategy				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
B21	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.		Closed-out during the previous audit	Not triggered
Flood Management - Construction				
B22	Prior to the commencement of construction, the Applicant must prepare and implement for the duration of construction: ...		Closed-out during the previous audit	Not triggered
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> <p>(c) includes a hot and cold water supply with a hose through a centralised mixing valve.</p> <p>(d) is naturally ventilated or an air handling exhaust system must be in place; and</p> <p>(e) includes signage to clearly describe the types of materials that can be deposited into recycling bins and general garbage bins.</p>		Operational requirement	Not triggered
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).	<p>Written response by Project Manager to audit questionnaire.</p> <p>Confirmed during the site inspection</p>	<p>The project advised that Public Domain design approval is ongoing. Drawings have been issued to Parramatta City Council for review and approval. The design has also been reviewed at a Transport Working Group (TfNSW).</p> <p>Physical works had not commenced during the reporting period</p>	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
B26	<p>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.</p> <p>Notes:</p> <ul style="list-style-type: none"> •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. 	<p>Written response by Project Manager to audit questionnaire.</p> <p>Confirmed during the site inspection</p>	<p>The project advised that Public Domain design approval is ongoing. Drawings have been issued to Parramatta City Council for review and approval. The design has also been reviewed at a Transport Working Group (TfNSW).</p> <p>Physical works had not commenced during the reporting period</p>	Not triggered
B27	<p>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:</p> <p>(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</p> <p>(b)Council agrees that a lesser width is acceptable having regard to other evidence provided by the Applicant to Council.</p>	<p>Written response by Project Manager to audit questionnaire.</p> <p>Confirmed during the site inspection</p>	<p>The project advised that Public Domain design approval is ongoing. Drawings have been issued to Parramatta City Council for review and approval. The design has also been reviewed at a Transport Working Group (TfNSW).</p> <p>Physical works had not commenced during the reporting period</p>	Not triggered
B28	<p>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.</p>	<p>Written response by Project Manager to audit questionnaire.</p> <p>Confirmed during the site inspection</p>	<p>The project advised that Public Domain design approval is ongoing. Drawings have been issued to Parramatta City Council for review and approval. The design has also been reviewed at a Transport Working Group (TfNSW).</p> <p>Discussions with council regarding dedication of footpath area in question have commenced.</p> <p>This condition had not been triggered during the reporting period.</p>	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"> •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. •All works within the public domain must be constructed by licensed contractors and any soft landscape works are carried out by licensed landscape contractors. 	<p>Written response by Project Manager to audit questionnaire.</p> <p>Confirmed during the site inspection</p>	<p>The project advised that Public Domain design approval is ongoing. Drawings have been issued to Parramatta City Council for review and approval. The design has also been reviewed at a Transport Working Group (TfNSW).</p> <p>Neither footpath or public domain works have commenced.</p>	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>The project advised that Public Domain design approval is ongoing. Drawings have been issued to Parramatta City Council for review and approval. The design has also been reviewed at a Transport Working Group (TfNSW).</p> <p>Alternative plants have been proposed to Parramatta City Council.</p> <p>Neither footpath or public domain works have commenced.</p>	Not triggered
B31	Any variations or alternatives to the requirements of condition B30 above can be undertaken in consultation and approval from Council.	Email train between RobertsCo and Parramatta City Council titled Updated Public Domain Submission - Crossing Widening SOP High School dated between 31 October 23 and 29 November 23.	Correspondence between RobertsCo and Parramatta City Council (PCC) confirmed the project had consulted with PCC regarding the widened pedestrian crossing on Burroway road to accommodate the future provision of a shared crossing.	Compliant
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.	Wentworth Point new High School Independent Environmental Audit March 2023	Closed-out during the previous audit	Not triggered
Site Levels				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
B33	Prior to the commencement of construction, plans must be provided to the certifier demonstrating that: (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 (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.	Wentworth Point new High School Independent Environmental Audit March 2023	Closed-out during the previous audit	Not triggered
Fire Safety and Registration of a Section 88B Instrument for Access				
B34	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: (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 (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. <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>	Fire Engineering Report (FER) - Sydney Olympic Park High School dated 17/03/23 Final issue Report No. F20158_FER_05	An FER was prepared by Core Engineering Group in consultation with FRNSW, detailed in Appendix A of the Plan. The auditor was not qualified to make further assessment of the quality of the plan. Further assessment of the plan was beyond the scope of this audit.	Compliant
B35	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: (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; (b)name the Planning Secretary (or other party as directed by the Planning Secretary) as the prescribed authority (a)include provision that the Section 88B instrument can only be revoked, varied or modified with the consent of the named prescribed authority; (b)include provision for uninterrupted fire safety, access and egress with consideration to any future construction and development within 9 Burroway Road; (c)be appropriately sized to facilitate fire brigade intervention and ensure unhindered access and egress at all times that the school is operational; and (d)meet any reasonable requirements of Fire and Rescue NSW as specified during consultation undertaken in accordance with Condition B34.	Deed of Agreement to Grant Easement, TfNSW and Minister for Education and Early Learning Section 88B Instrument Plan of Easement over Lot 2 in DP 1276305	A Section 88B Instrument Plan of Easement over Lot 2 in DP 127630 has been prepared. The instrument was prepared by HWL Ebsworth Lawyers. The legal attributes of this instrument were not assessed as part of this audit.	Compliant
B36	The Section 88B Instrument required by Condition B35 may include: (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.	Deed of Agreement to Grant Easement, TfNSW and Minister for Education and Early Learning Land Registry Services DP1289467 dated 31/3/23 Land Registry ServicesDP1289467 reg dated 31/3/23	A Section 88B Instrument Plan of Easement over Lot 2 in DP 127630 has been prepared. The instrument was prepared by HWL Ebsworth Lawyers. The legal attributes of this instrument were not assessed as part of this audit.	Compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
B37	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: (a)that does not rely on or require access over any adjoining land, other than land currently dedicated as a public road; and (b)the performance solution is consistent with any requirements of Fire and Rescue NSW as specified during consultation undertaken in accordance with condition B34.		A Section 88B Instrument Plan of Easement over Lot 2 in DP 127630 has been prepared.	Not triggered

PART C DURING CONSTRUCTION

Site Notice				
C1	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: (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; (b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period; (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 (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.	Site inspection	A site notice(s) must be prominently displayed at the boundaries of the site. Refer to Photos 2 .	Compliant

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.	Roberts Co. Integrated Management System Form, Elevated work platform (pre-use acceptance checklist) Sighted record for Plant ID No 009 for a forklift and telehandler. Reviewed 12/7/23.	All plant items arriving on site are assessed via a pre-commencement checklist which includes the requirement for service and maintenance records.	Compliant
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Construction Hours

C3	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 6pm, Mondays to Fridays inclusive; and (b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays.	Confirmed in writing by the applicant .	There were no non-compliances during the audit period.	Compliant
C4	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: (a) between 6pm and 7pm, Mondays to Fridays inclusive; and (b) between 1pm and 4pm, Saturdays.		No work has been undertaken in the shoulder periods.	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
C5	Construction activities may be undertaken outside of the hours in condition C3 and C4 if required:	Wentworth Point new High School Works Notification 6 October 2023	In accordance with Condition C5(a), a pile rig was proposed to be delivered to site between 16 and 20 October 2023, outside normal working hours, to meet Transport for NSW requirements as an oversized delivery. The rig was delivered on site on 16/10/23.	Compliant
	(a) by the Police or a public authority for the delivery of vehicles, plant or materials; or	0595 - Road permit for SOP. NSW Class 1 Load Carrying Vehicle Operators Guide		
	(b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or	Department of Planning Major Projects Portal receipt dated 10/10/23 for Schedule 2 Condition C5d	In addition, in accordance with Condition C5(d) one of the two tower cranes on site was dismantled and removed on the weekend on Saturday 21 October 2023 between the hours of 8am and 4pm.	
	(c) where the works are inaudible at the nearest sensitive receivers; or	SINSW letter to DPE dated 10/10/23: Notification in accordance with Condition C5d	SINSW notified DPE of the proposed works associate with Condition C5(d) on 10/10/23, at least 7 days prior to the works.	
	(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			
	(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.			
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.	Wentworth Point new High School Works Notification 6 October 2023	Refer to C5	Compliant
C7	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:	Interview	No rock breaking, rock hammering, sheet piling, pile driving or similar has occurred during the audit period.	Not triggered
	(a) 9am to 12pm, Monday to Friday			
	(b) 2pm to 5pm Monday to Friday; and			
	(c) 9am to 12pm, Saturday.			
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:	Compliant
			CEMP	Compliant
			Construction Traffic and Pedestrian Management Plan	Compliant
			Noise and Vibration Management Plan	Compliant
			Construction Waste Management Plan	Compliant
			Air Quality Management Plan	Compliant
Construction Soil and Water Management Plan	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 and inspection	RobertsCo undertake a Crane board/delivery meeting each day to coordinate unloading and deliveries.	Compliant
			A concrete haul road to the western and central portions of the site has also been established to provided multiple waiting areas for delivery vehicles within the site boundary.	
			No evidence of queuing was observed at the time of the audit. No complaints have been received regarding queuing.	
Hoarding				
C10	The following hoarding requirements must be complied with:	Site inspection	No third party advertising or graffiti was observed at the time of the inspection.	Compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	(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.			
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/719/2023 dated 2 November 2023.	RobertsCo obtained permits from PCC to obstruct the footpath on Burroway Road, adjacent to the site. The permit must be renewed on a fortnightly basis. A sample permit was sighted for the period between 7/1/23 and 20/12/23.	Compliant
Construction Noise Limits				
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	Section 6 of the NVMP does not require noise monitoring for the project except in the event of a noise complaint. There have been no noise complaints attributable to construction at the site.	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 Site interview	The project confirmed there have been no noncompliance events against this condition. In relation to concrete trucks, RCo advised that concrete is not released from the concrete batching plant before 7am.	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 report stipulates no street trees have been trimmed or removed.	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	(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 5.	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 5.	Not triggered
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 calm. No complaints relating to dust were recorded by the project.	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: - rumble grid for wheel wash (Photo 4) - concrete sealed active portions of the site (Photos 1, 3 and 4) - 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.	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 during the reporting period.	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.	Email from Nova Civil to Parramatta City Council (PCC) dated 24/7/23 Email from Parramatta City Council to Nova Civil dated 25/7/23 Permit to discharge dated 4/8/23	A contractor sought approval from PCC to discharge ground water from sewer works at 7-9 Burroway Road Wentworth Point to PCC stormwater system. PCC advised the contractor that no formal permission is required to discharge to Council stormwater system. In addition, a RobertsCo discharge permit was sighted for 4/8/23 (30,000L). The permit maintained records confirming the water was within specified criteria.	Compliant
Emergency				

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
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	<p>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:</p> <p>(a) be designed by a suitably qualified and experienced person(s);</p> <p>(b) be generally in accordance with the conceptual design in the Amendment Report;</p> <p>(c) be in accordance with applicable Australian Standards; and</p> <p>(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;</p>	Wentworth Point new High School Independent Environmental Audit March 2023	This requirement was deemed compliant and closed out by the previous by IEA 1, dated March 2023.	Compliant
Aboriginal Heritage				
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.	Wentworth Point new High School Independent Environmental Audit March 2023	This requirement was deemed compliant and closed out by the previous by IEA 1, dated March 2023.	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	Wastes generated on site are stored in comingled skip bins. Bingo take the bins for processing (Photos 10 and 11).	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).	Sample Report: Geosyntec Consultants Waste Classification Assessment dated 15/11/23	Spoil won from the excavation of service trenching to a depth of 200mm below the site marker layer, within the site footprint (estimated 20m ³) was classified prior to disposal off site. The material was classified as SP15-Special Waste (asbestos) - General Solid Waste (non-Putrescible).	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	<p>Waste concrete and rinse water was observed in metal skips for disposal (Photo 14).</p> <p>It was further observed that an innovative paint brush and roller washing drum had been established to prevent painters from cleaning paint equipment in sinks within the new building or upon the ground (Photo 15).</p>	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 up to December 2023.</p> <p>Mainland Civil Cartage Export Tracking Summary - Fill Material</p> <p>Bingo Industries dockets for 17/11/23 and 18/11/23.</p>	<p>The Bingo Monthly report for waste disposal identifies recyclable materials and landfilled materials. For January 2023 to December 2023, it reported that 92.35% of wastes, by weight, were recycled.</p> <p>The Mainland Civil Cartage Export Tracking Summary - records waste quantities, classifications, disposal facility, and date. The register shows 272 tonnes of special waste (Asbestos) was delivered to Bingo - Eastern Creek. This was consistent with Bingo Industries dockets for 17/11/23 and 18/11/23.</p>	Compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
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.	Wentworth Point new High School Independent Environmental Audit March 2023	This requirement was deemed compliant by the previous by IEA 1, dated March 2023. As an update, the draft validation report sighted during the previous audit had not been finalised. 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.	Compliant
Lighting				
C31	The Applicant must ensure that all external lighting is constructed, operated and maintained in 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: ...	Wentworth Point new High School Independent Environmental Audit March 2023	This requirement was deemed compliant by the previous by IEA 1, dated March 2023. As an update, the draft validation report sighted during the previous audit had not been finalised. 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.	Compliant
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.	Wentworth Point new High School Independent Environmental Audit March 2023	This requirement was deemed compliant by the previous by IEA 1, dated March 2023. As an update, the draft validation report sighted during the previous audit had not been finalised. 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.	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).	L0002 Interim Audit advice (0503-2109-002) - SOPhS Wentworth Point dated 27/02/2022. Geosyntec Consultants 21067 RAP addendum 1 March 2022	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.	L0002 Interim Audit advice (0503-2109-002) - SOPhS Wentworth Point dated 27/02/2022. Geosyntec Consultants 21067 RAP addendum 1 March 2022 Geosyntec Consultants " Draft Validation Report - Sydney Olympic Park High School" dated 19 December 2022	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	This audit report represents the second independent audit for the project. This audit was undertaken within 26 weeks of commencement of the initial IEA and consistent with the requirements of the Independent Audit Post Approval Requirements.	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	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.		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: (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;	NSW Education, School Infrastructure letter dated 28/8/23 - Sydney Olympic Park new high school (Wentworth Point) (SSD 11802230): Submission of Independent Environmental Audit Report and response in accordance with Consent Condition C39 and C40.	The final report for the second IEA together with the proponent's response was submitted to DPE on 29/8/23 and therefore was due to be made publicly available by 28 October 2023. Internal correspondence confirmed that the project requested on 26/10/23 that the communications team to upload the report onto the project website. No evidence	Non-compliant

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	<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>	<p>Department of Planning Major Projects Portal Receipt dated 29/8/23 for schedule 2 Conditions C39 and C40.</p> <p>EY email to SINSW dated 26/10/23 requesting the Audit report and SINSW response to be posted to the project web-page.</p> <p>Interview</p>	<p>was available to confirm the date the documents were uploaded onto the project web-site. Verbal advice suggests that the documents were uploaded onto the project web-site on 8-9 November 2023, not within 60 days of submission to the Planning Secretary.</p> <p>On the balance of information available, a noncompliance has been awarded for this condition.</p> <p>WPHS-03 NC-01: The Project did not make the second Independent Audit Report, and response to it, publicly available within 60 days of submission to 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.	<p>NSW Education, School Infrastructure letter dated 28/8/23 - Sydney Olympic Park new high school (Wentworth Point) (SSD 11802230): Submission of Independent Environmental Audit Report and response in accordance with Consent Condition C39 and C40.</p> <p>Department of Planning Major Projects Portal Receipt dated 29/8/23 for schedule 2 Conditions C39 and C40.</p>	The inspection for the second audit was undertaken on 11/07/23. The final report for the second IEA together with the proponent's response was submitted to DPE on 29/8/23, within 2 months of the site inspection, in accordance with Independent Audit Post Approval Requirements.	Compliant
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	Operational readiness work must not commence on site until the following details have been submitted to the Certifier:		The site is not at the operational readiness stage.	Not triggered
	<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>			
C43	Operational readiness work must only be undertaken in accordance with the details submitted under condition C42 and the following requirements:		The site is not at the operational readiness stage.	Not triggered

Approval Condition (ID)	Requirement	Evidence to be collected	Response/Findings/Recommendations	Compliance Status
	(a) no more than 15 staff are involved in operational readiness work; (b) no students or parents are permitted; and (c) the Applicant has implemented appropriate arrangements to ensure the safety of school staff.			
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.	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	Refer to Table C1, Condition AA25	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 19/10/2023, 11/12/23 Pre-start meeting record 14/12/23	A sample of pre-start meeting minutes were sighted where monitoring of sediment controls, dust chemical and fuel management and spills was raised with the workforce.	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 Photo 1	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 concrete driveway was observed on site. Refer to photo 4	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

Section	Requirement	Evidence to be collected	Response/Findings/Recommendations	Conformance Status
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
	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. The site has moved away from civil works and transitioned to quieter superstructure construction works.	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	Interview and records	Refer to CoA B17	Conformance

Section	Requirement	Evidence to be collected	Response/Findings/Recommendations	Conformance Status
	recycling and disposal information	Bingo Industries Waste Monthly Report	Records of recycling and disposal records were sighted. Observation of Concern WPHS-03 Obs-01: Co-mingled waste bins on site were overfilled and had the potential to generate wind-blown litter.	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	Not applicable. There were no asbestos stockpiles on site.	Not triggered
	sediment controls around stockpiles. Locate away from drainage lines	Site inspection	Excavated Natural Material (ENM) stockpiles were located away from watercourses (refer to photo 9).	Conformance
	cover stockpiles during rain or wind	Site inspection	Excavated Natural Material (ENM) stockpiles were covered (refer to photo 9).	Conformance
	separate topsoil stockpiles	Site inspection	Not applicable. There were no topsoil stockpiles on site.	Not triggered
	Stock pile slope not to exceed 2H:1V	Site inspection	The batters of the ENM stockpile was steeper than 2:1 but the covers provide adequate stability to the stockpile (refer to photo 9).	Conformance
	conformity assessment for waste concrete removed from the site	Site inspection	Not observed on site.	Not triggered
	trenches backfilled with insitu material or certified VEMN.	Site interview	No VENM has been imported to the site	Not triggered
	Equipment hygiene within the site to prevent cross contamination	Mainland Civil Safe Work Method and Environmental Method Statement dated 26/09/22.	In anticipation of potential asbestos work, during utility installation the contractor worked under a work method statement for removal of asbestos. The work method statement addressed equipment hygiene	Not triggered
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 concrete driveway was observed on site and the egress point has been sealed.	Conformance
	clean up of public roads	Interview and site inspection	Conditions on the day of inspection were dry and no wind. Negligible tracking was observed on public roads.	Conformance
	covering or stabilisation of stockpiles	Site inspection	Excavated Natural Material (ENM) stockpiles were covered (refer to photo 9).	Not triggered
	stabilisation of ground likely to be exposed for significant period.	Site inspection	RobertsCo had sealed trafficable areas of the site with concrete to reduce the potential for tracking.	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

Section	Requirement	Evidence to be collected	Response/Findings/Recommendations	Conformance Status
	non-idling plant and equipment	Interview and site inspection	Observations on site did not identify any idling plant.	Not triggered
	no excessive air emissions from plant and equipment	Interview and site inspection	Observations on site did not identify any idling plant.	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. There have been no compliants associated with dust.	Conformance
	No dry cutting	Interview and site inspection	Observations on site did not identify any nuisance dust from power tools.	Not triggered
4.5.1 Asbestos Management				
	Workers in areas where ACM may be encountered must be inducted into the AMP and records kept	Mainland Civil Safe Work Method and Environmental Method Statement dated 26/09/22.	In anticipation of potential asbestos work, during utility installation the contractor worked under a work method statement for removal of asbestos. The work method statement addressed equipment hygiene	Conformance
	Regular audits of implementation of the AMP			Not assessed
4.5.2 Odour ground gas and vapour				
	Monitoring of all open excavations and remediated soils with PID and gas analyser	Site inspections	There are no open excavations at the site.	Not triggered
4.6 Construction soil and water management plan				
	Implement erosion and sediment controls as per the blue book.	CSWMP ESCP Site inspection	<p>Erosion and sediment control plan was effectively implemented:</p> <ul style="list-style-type: none"> - The western side (active side) of the site, commencing from the main driveway, was sealed with concrete to minimise tracking and dust (photos 1, 3 and 4) - The exit point to the site onto Burroway Road was free of tracked sediment. Sediment in the gutter to Burroway Road adjacent to the site, was minor (Photo 4) - Drainage pits along Burroway Road, adjacent to the site had sediment protection in place (Photo 7) - A large capacity stormwater channel was constructed along the western boundary to contain stormwater runoff from the site in accordance with the site's SWMP. Hay bale checks were laid within the channel to slow water velocity and allow sediment to settle. (Photo 8) - A sump (approximately 3x3x1.5m deep) has been excavated and backfilled with coarse gravel in the driveway along the eastern boundary of the site. The sump is located at a low point and serves to capture stormwater and reduce surface water from the work area. (Photo 12) - Containers of fuel were stored in a lockable cabinet, under cover and bunded. A Class 2 hazardous substances placard was displayed however the cage contained Class 3 material (Photo 16). <p>Observation of Concern WPHS-03 Obs-02: Class 2 placarding was observed on a hazardous substances cage that contained Class 3 substances.</p>	Conformance
4.7 Construction Flood and Emergency Management				

Section	Requirement	Evidence to be collected	Response/Findings/Recommendations	Conformance Status
	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	Evacuation drill record dated 24/2/23.	An emergency drills had occurred on site, related to construction flood and emergency management on 24/2/23. No drills have occurred since then. Observation of Concern WPHS-03 Obs-03: Construction flood and emergency drills have not been undertaken at least twice per year.	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 or flood warning is issued.	Site interview	The site monitors BOM for weather alerts including flood as per section 8 of the management plan	Conformance
4.8 Acid Sulphate Soil Management Plan				
	Appointment of suitable person for managing ASS	Interview	Civil works were complete and the site has been capped with VENM as per the validation report .	Not triggered
	Daily attendance of consultant for sampling for PASS	Interview	Civil works were complete and the site has been capped with VENM as per the validation report .	Not triggered
	Monitoring including: -soil(pH, lab testing SPOCAS, liming soil, onsite remediation or off site - water (storage of water on site, test prior to disposal)	Interview	Civil works were complete and the site has been capped with VENM as per the validation report .	Not triggered
4.8.1 Surface water				
	Limiting extent of cleared area	Site inspection	Work has progress to cover the whole site. RobertsCo were progressively sealing the site with concrete (Refer to Photo 2&3)	Conformance
	HDPE sheeting under stockpiles	Site inspection	Not applicable. There were no stockpiles on site with poteial for Acid sulphate soils.	Not triggered
	silt fences/hay bales to minimise sedimentation.	Site inspection	Refer to Section 4.6 - Soil and water Management Plan	Conformance
	protection of existing drains	Site inspection	Refer to Section 4.6 - Soil and water Management Plan	Conformance
4.8.2 Ground water management and dewatering				
	minimise depth of dewatering	Interview	RobertsCo advised that no ground water was encountered.	Not triggered
	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. Independent Audit Declaration Form



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>28 July 2023</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

-
- 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)

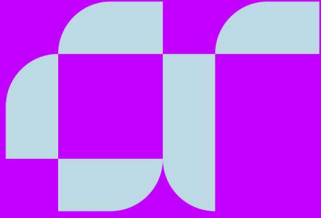
Name of Auditor:	<i>Maurice Pignatelli</i>
Qualification:	<i>BE(Civil). MEng.Sc. Exemplar Global Lead Environmental Auditor</i>
Company:	<i>OptimE Pty Ltd</i>
Signature:	



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.

AtkinsRéalis



AtkinsRéalis

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