

William Clarke College (new Bryson Building)

Assessment of Environmental System Compliance in accordance with SSD-35715221 Development Consent

Audit Reference:	WCC-01
Audit Organisation:	Rohrig (Contractor) Mostyn Copper (Project Manager) William Clarke College (Proponent)
Auditors:	Barbara Pater, APP (Lead Auditor) Sanan Qasim, APP (Assistant Auditor)
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This report has been prepared and reviewed in accordance with our quality control system.

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1. Executive Summary

William Clarke College (Proponent) and MostynCopper Group (Project Manager) are delivering the redevelopment of the William Clarke College project located in Kellyville which involves construction of the four (4) storey Bryson Building, relocation of waste and recycling compound, modified and new vehicle areas & carparking and landscaping. The Bryson Building works are being constructed by Rohrig (Contractor) with construction completion expected in 2026.

This Audit Report presents the outcomes of the first independent environmental audit of the William Clarke College (new Bryson Building) with an assessment of environmental controls established by Rohrig Constructions (Rohrig) against the requirements of State Significant Development conditions SSD-35715221 for the project, and in accordance with the *Independent Audit Post Approval Requirements* (IAPAR 2020).

The audit was conducted by The APP Group – HSEQ Systems and Auditing (APP) on 6 February 2025 with a review of Schedule 3 Parts A, B, C, D, Advisory Notes and Incident Notification and Reporting Requirements of the SSD-35715221 consent conditions. As per the IAPAR 2020 requirements, the audit was undertaken within 12-weeks of the commencement of construction which commenced on 26 November 2024. The audit covered the Construction Certificate 1 & 2 works which comprises of site wide civil works, inground services, stormwater works, inground structure / substructure including the construction of the ground floor concrete slab and erection of the building structure.

Rohrig demonstrated good controls during the audit period to address environmental impacts. The following key strengths were noted:

- ▶ Tidy condition throughout the site with effective implementation of erosion and sediment controls.
- ▶ Effective communication demonstrated between William Clarke College, Rohrig, and MostynCopper.
- ▶ Proactive response to site inspection observations, with immediate closeout actioned.
- ▶ Rohrig team presented evidence promptly demonstrating strong document control practices.
- ▶ Effective use of the Hammertech system, demonstrated through weekly inspections and consistent record maintenance, despite the recent transition to the platform.

The independent environmental audit assessed a total of 128 conditions, comprising of a review of documents and records, interviews of key personnel and a site inspection.

Site inspection

Three (3) observations were identified during the site inspection (refer to [Section 6.4](#) for further details with photos included under [Appendix G](#)).

1. The Site Notice displayed did not include the name of the Certifier or Structural Engineer and was therefore deemed non-compliant with the requirements of Condition D1(c). Following the audit, photo evidence of new site notice was provided, displaying the contact details of the Certifier and structural engineer (refer to NC-02).
2. A spill kit was not available near the chemical storage area. The project team promptly relocated a spill kit next to the storage area, addressing the observation immediately.
3. A general waste bin was placed in front of the fire extinguisher, restricting access. The project team promptly removed the bin to restore clear access to the fire extinguisher.

Findings

There were two (2) non-compliances and four (4) opportunities for improvements identified during this audit summarised as follows:

Audit Rating and Ref	Condition of Consent	Audit Finding Details	Audit Recommendations	Close Out
WCC-01_NC-01	<p>A2: Terms of Consent</p> <p>The development may only be carried out:</p> <p>(a) in compliance with the conditions of this consent;</p>	Based on the non-compliance identified against Condition D1, A2 is triggered as non-compliant.	Close out of Condition D1 will automatically address this requirement.	Following the audit, photo evidence was provided to fully address Condition D1. This non-compliance is now addressed and considered CLOSED .
WCC-01_NC-02	<p>D1: Site Notice</p> <p>A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purposes of informing the public of project details and must satisfy the following requirements:</p> <p>(c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice</p>	The Site Notice displayed at the time of the audit did not include the name of the Certifier or Structural Engineer and was therefore deemed non-compliant with the requirements of Condition D1(c).	Close out of this non-compliance will be based on the evidence provided showing the new sign installed with updated details to address Condition D1 in full.	Following the audit, photo evidence of the new site notice was provided, now displaying the contact details of the Certifier and structural engineer as required by Condition D1. Refer to Photos under Appendix G . This non-compliance is now addressed and considered CLOSED .
WCC-01_OFI-01	C13: Environmental Management Plan Requirements	Several of the management plans developed by WSP did not include revision numbers, current details	It is understood that the first review of plans is upcoming as part of the 3-monthly cycle.	Following the audit, the CEMP Revision 3, dated 6 February 2025, and Sub-

Audit Rating and Ref	Condition of Consent	Audit Finding Details	Audit Recommendations	Close Out
	<p>Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> (DPIE April 2020).</p> <p><i>Note: The Environmental Management Plan Guideline is available on the Planning Portal at: https://www.planningportal.nsw.gov.au/majorprojects/assessment/post-approval</i></p> <p>Note: <i>The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</i></p>	<p>within the document control page, or sign off for approval, with no document control or revision page included within the Flood Management Plan. Throughout the CEMP and sub-plans, there were also broken links and errors in bookmarks.</p>	<p>It is therefore recommended to work with WSP in updating to the correct plan references and revisions for traceability purposes.</p>	<p>Plans were provided with an updated document control page and the required signatures. Additionally, the broken links have been rectified. This OFI is now addressed and considered CLOSED.</p>
WCC-01_OFI-02	<p>C16: The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:</p> <p><i>Refer to Condition C16 (a) through to (e) for full details.</i></p>	<p>Although a stand-alone document to address Condition C19 has been developed, the Driver Code of Conduct is not appended to the CTPMSP.</p> <p>Additionally: as linked to WCC-01_OFI-01 included under Condition C13:</p> <p>The CTPMSP was issued on 7 September 2024; however, it includes the consultation letter from TfNSW</p>	<p>Given their interrelation, it is recommended to include the Driver Code of Conduct as part of the CTPMSP and consolidate these documents for ease of reference.</p>	<p>Following the audit, CTPMSP Revision 1, dated 6 February 2025 was provided with the updated document control page. The Driver Code of Conduct has been included as per Section 5.5 "Driver Code of Conduct". However, the page numbering is not aligned with the rest of the document.</p>

Audit Rating and Ref	Condition of Consent	Audit Finding Details	Audit Recommendations	Close Out
		dated 16 October 2024. Upon review of the CTPMSP, TfNSW comments appeared to be adequately addressed. As per WCC-01_OFI-01, it is recommended when reviewing and updating the plans, to include the current revision and date as well as the signature for the plan's approval.		It is recommended that the page numbers be updated during the upcoming plan review, however for the purpose of the audit, this finding has now been addressed and considered CLOSED .
WCC-01_OFI-03	C18: The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP)	The current version of the CSWMSP is in draft and word format.	It is recommended that when undertaking a review of the management plans as per Condition C13, that the CSWMSP is finalised as a pdf version.	Following the audit, CSWPM Revision 1, dated 6 February 2025, was provided in pdf format as a finalised version with the required signature. This OFI is now addressed and considered CLOSED .
WCC-01_OFI-04	D9: Implementation of Management Plans The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	The complaints register, as developed in accordance with the Community Engagement Strategy and available on the project website, included details of the complaint received 28-Nov-24 and actions to be taken to address the complaint. However, there was no date to demonstrate when the complaint was addressed and closed.	It is recommended to update the register to include the close out date (5-Dec-24) to demonstrate that actions have been undertaken in a timely manner. It is also recommended to ensure any future complaints include this detail.	Following the audit, the updated Complaints Register was provided which now includes a column for the date closed. This OFI is now addressed and considered CLOSED .

Refer to [Section 6.8](#) and [Appendix E](#) for further detail and status of these findings.

2. Introduction

2.1 Background

The Bryson Building is the third stage of the William Clarke College Master Plan and involves the construction of a state-of-the-art, four-story multi-use teaching and learning facility. Located at the heart of the campus, this building will include new and expanded Primary and Secondary libraries, a new home for Stage 3 students, numerous learning areas, a large multi-purpose hall, staff common areas and faculty spaces, canteen, café, amenities and a large covered outdoor learning area.

The building is being delivered by William Clarke College as the Proponent and MostynCopper Group (MostynCopper) who are engaged as the Project Manager. Rohrig have been appointed as the contractor to construct the building in accordance with the Development Consent SSD-35715521, approved on 20 October 2023.

The Proponent has engaged The APP Group – HSEQ Systems and Auditing (APP) to undertake the independent environmental audit on 6 February 2025. The audit was conducted in compliance with Schedule 3, Condition D35 of the Development Consent SSD-35715221, which states that:

Condition D35: Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.

The scope of this audit included a review of Construction Certificate 1 works, covering site-wide civil works, inground services, stormwater works, inground structure and ground floor concrete slab, and Construction Certificate 2 works, which encompasses the erection of the building structure.

2.2 Project Details

Project Name	William Clarke College (new Bryson Building)
Project Application No.:	SSD-35715221
Project Address:	William Clarke College, Morris Grove Road, Kellyville NSW
Project Phase:	Construction of Bryson Building is currently ongoing in accordance with Construction Certificate 1 and Construction Certificate 2, which includes site-wide civil works, inground services, stormwater works, inground structure, ground floor concrete slab, and erection of the building structure.
Project Activity Summary:	<p>The following is a summary of the works that were in progress at the time of audit:</p> <ul style="list-style-type: none"> • Bryson Building construction in progress. • 90 % foundation completed • Piling works completed • Concrete pour for slab and ground floor with level 1 progressing • Trenching works ongoing – installation of sewer, trade waste stormwater drainage • Staging for level 2 – upcoming works

2.3 Audit Team

Details of The APP Group independent environmental auditing team as approved by the Department of Planning, Housing and Infrastructure (DPHI) for this audit are as follows:

Name	Company	Position	Certification
Barbara Pater	APP	Lead Environmental Auditor	Exemplar Global Lead Environmental Auditor – Certificate No. C424613
Sanan Qasim	APP	Assistant Auditor	Exemplar Global Lead Environmental Auditor – Certificate No. C467153

The auditor approval letter from DPHI for this audit is attached as [Appendix C](#) with the Independent Audit declaration form included as [Appendix D](#).

3. Audit Objectives and Scope

3.1 Audit Objectives

The objective of this audit was to undertake the first independent environmental review of the project in compliance with Development Consent Schedule 3, SSD-35715221 Condition D35, in accordance with the requirements for the independent audit methodology and independent audit report as per the *Independent Audit Post Approval Requirements* (IAPAR 2020).

3.2 Audit Scope

The scope of this audit comprised a review of the Project compliance with Schedule 3 SSD-35715221 conditions Parts A, B, C, D, Advisory Notes, and Incident & Reporting Requirements, including the following:

- ▶ Review of implementation of management plans, including:
 - Construction Environmental Management Plan
 - Construction Traffic and Pedestrian Management Plan
 - Construction Noise and Vibration Management Plan
 - Construction Soil and Water Management Plan
 - Emergency Management Plan
 - Communication Consultation Strategy
- ▶ Site inspection conducted on the 6 February 2025
- ▶ Review of the environmental performance on the project
- ▶ Review of environmental records
- ▶ Interviews with site personnel
- ▶ Consultation with stakeholders.

3.3 Audit Period

This was the first independent environmental audit of the project carried out by APP, covering the review of environmental documentation and records within 12 weeks of commencement of construction (notified as 26 November 2024) to 6 February 2025, which is defined as the audit period.

It is noted that this report is based on the result of sampling and supplied documentation and records, as well as activities sighted on the date of the audit, 6 February 2025, and additional records received until 27 February 2025.

4. Audit Methodology

4.1 Approval of Auditors

Letter from the Planning Secretary agreeing to the auditors is included under [Appendix C](#).

4.2 Audit Scope Development

APP developed the audit scope and a checklist based on the Project Requirements set out in the Development Consent SSD-35715221, Schedule 3 – refer to [Appendix E](#) of this report. Consultation with project stakeholders was also undertaken as part of the scope development as per [Section 4.6](#).

4.2.1 Schedule 2 of the SSD

It is noted that although the Bryson Building is considered as part of Schedule 2 of Development Consent SSD-35715221 (Concept Proposal and Future Developments), compliance appeared adequately addressed under the submission and approval process for modification 1 (Mod-1), with the Mod-1 changes actioned against Schedule 2, Condition A3 only. As compliance has been achieved with the relevant Schedule 3 conditions and the Certifier has issued Construction Certificates 1 and 2 with reference made to the applicable architectural plans and drawings, Schedule 2 has therefore been omitted from this audit.

4.3 Audit Process

4.3.1 Opening Meeting

An opening meeting was held with personnel from William Clarke College (WCC), Rohrig, and MostynCopper as per the Audit Attendance Sheet ([Appendix B](#)) on 6 February 2025 at 9:30am.

Key items were discussed as follows:

- ▶ Confirmation of the purpose and scope of the audit
- ▶ Overview of the Project and status of the works
- ▶ Occurrence of environmental incidents and non-compliances, if applicable
- ▶ Overview of the audit process in accordance with the Schedule 3 Consent Conditions and the *Independent Audit Post Approval Requirements* (IAPAR 2020).

4.3.2 Conduct of Audit

Audit activities included the following:

- ▶ Review of the project documentation (CEMP and its Sub-Plans) to verify compliance with the SSD-35715221 Schedule 3 conditions
- ▶ Conduct of a site walk led by Rohrig to review implementation of mitigation measures and environmental controls
- ▶ Conduct of the audit based on the checklist with the Conditions of Consent, interviews with personnel and review of records provided as evidence of compliance, and
- ▶ Discussion of any identified findings and actions noted during the site inspection.

4.3.3 Closing Meeting

The closing meeting was held on 6 February 2025 at 3:00pm with representatives of WCC, Rohrig, MostynCopper, and APP. General feedback and the audit findings were discussed during the closing meeting.

The APP auditors acknowledged the efforts made in preparing for the audit, cooperation, and openness of all personnel during the conduct of this audit.

4.4 Interviewed Persons

Name and position of persons interviewed:

Name	Organisation	Position
Mark Alexander	WCC	Property & Infrastructure Manager
David Jennings	WCC	COO
Gabriel Reyes	MostynCopper	Senior Project Manager
Erica Choo	MostynCopper	Assistant Project Manager
Ryan Carroll	MostynCopper	Project Director
Andries Van Der Walt	Rohrig	Site Manager
Brad Blanshard	Rohrig	Senior Project Manager
Joshua Gosling	Rohrig	Junior Contracts Admin

Table 1- Personnel Interviewed

4.5 Site Inspection

A site inspection was carried out on 6 February 2025 at 10:00am with representatives of WCC, Rohrig, MostynCopper and APP. One non-compliance and two observations were identified during the site inspection. Refer to details of the inspection in [Section 6.4](#) of this report and site photos included under [Appendix G](#).

4.6 Consultation

Consultation with the Department of Planning, Housing and Infrastructure (DPHI) was sent in advance of the audit to request feedback on the project as per IAPAR 2020 Section 3.2.

As per email correspondence dated 29 January 2025, DPHI has no further comments in relation to the scope beyond ensuring that the IEA complies with State Significant Development Consent SSD-35715221 and the *Independent Audit Post Approval Requirements* (IAPAR 2020).

Additionally, DPHI also requested to consult with the Hills Shire Council.

4.6.1 APP Response

APP have addressed DPHI's comments as follows:

Request	Response
<ul style="list-style-type: none"> IEA complies with state significant development consent SSD-35715221 and the Independent Audit Post Approval Requirements (2020). 	<p>This is the first independent environmental audit of the development which is being carried out within 12 weeks of commencement of construction (26 November 2024) as per the IAPAR 2020.</p>
<ul style="list-style-type: none"> Consultation with the Hills Shire Council 	<p>Consultation with the Hills Shire Council was sent on 30 January 2025 to request feedback on the project as requested by the DPHI. The Council suggested a focus on dust, noise, traffic control and stockpile management. Refer to the Condition D9 for the detailed review of dust, noise, traffic control and stockpile management.</p>

Refer to [Appendix F](#) for a copy of the consultation.

4.7 Audit Compliance Status Descriptors

The following audit criteria were used for the rating of audit findings.

Rating	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-Compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Table 2 - Audit Criteria

In addition to the above descriptors, there was the option to raise Opportunities of Improvement (OFI) during this audit.

5. Document Review

- Construction Environmental Management Plan (CEMP), 24 October 2024
- Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) Issue 0, 7 September 2024
- Construction Noise and Vibration Management Plan (CNVMP) Revision 0, 29 August 2024
- Construction Soil and Water Management Plan (CSWMP) Revision 0, 15 October 2024
- Emergency Management Plan version 1, 28 August 2024
- Rohrig's Driver Code of Conduct
- Construction Flood Emergency Management Plan (CFEMP)
- Community Engagement Strategy revision final, 9 September 2024
- Submission of Community Engagement Strategy to DPHI, 9 September 2024
- DPHI post approval receipt SSD-35715221-PA-1, 9 September 2024
- Submission of CEMP and Sub-Plans to DPHI, 10 September 2024
- DPHI post approval receipt SSD-35715221-PA-2, 10 September 2024
- Email correspondence with WSP for CEMP, 26 August 2024
- Submission of CEMP and Sub-Plans to Certifier, 21 November 2024
- Construction Certificate No. 23/0296/01, 22 November 2024
- Construction Certificate No. 23/0296/02, 15 January 2025
- Structural Engineering Design Certificate by Birzulis Associates, 9 October 2024
- Structural Engineering Design Certificate by Birzulis Associates, 14 October 2024
- PMDL Building Specifications, Revision A, 5 April 2024
- Rohrig email to Locker Group 'Subcontractor Pack', 24 January 2025
- Non-compliance notification to DPHI, 12 February 2025
- DPHI post approval receipt SSD-35715221-PA-18, 12 February 2025
- Rohrig email to Council 'submission of stormwater management system', 29 August 2024
- Engineering documentation endorsement letter from Council, 21 November 2024
- Investigation Report reference: R.001.Rev0R.001.Rev0, project no. 71317.02, 25 July 2024
- Long Service Levy receipt no. 7541562, 18 July 2024.
- Long Service Levy receipt no. 7552630, 6 August 2024
- notification Letter to DPHI "WCC Bryson Building: Condition C1 & C2 – Project Commencement, Operation & Staging", 1 November 2024
- DPHI post approval receipt SSD-35715221-PA-17, 1 November 2024
- Pre-Construction Dilapidation Report prepared by Opal Dilapidation, Rev 00, reference: OD3736, 28 August 2024
- Submission of pre-construction dilapidation report to DPHI, 3 September 2024
- DPHI post approval SSD-35715221-PA-4, 10 September 2024
- Submission of pre-construction dilapidation report to Certifier, 3 September 2024
- Letter from Douglas Partners reference: R.002.Rev0, dated 2 September 2024
- Letter from DFP Planning "WCC – Bryson Building – Condition C11 – Ecologically Sustainable Development", 13 December 2024
- Letter from Ian Swane and Associates, 2 September 2024
- Maintenance logbook details for Excavator, 21 November 2024
- Plant Risk Assessment for Excavator, 8 July 2019
- Inspection report 745423 for Excavator, 6 May 2024

- Maintenance logbook details for Excavator, 5 December 2024
- Plant Risk Assessment for Tower Crane, 19 September 2024
- Pre-Installation checklist for Tower Crane, 10 January 2025
- Advance service checklist for Tower Crane, 15 January 2025
- Weekly safety and environmental inspection ISP-5710, 3 February 2025
- Weekly safety and environmental inspection ISP-4324, 20 January 2025
- Task Observation inspection ISP-2938 for hydraulic trenching, 16 December 2024
- Emergency Drill Response MEET-11353 for Plant and Vehicle crash, 16 January 2025
- Crane install toolbox talk MEET-10864, 13 January 2025
- Toolbox Talk MEET-9208 for Heat Exhaustion, 17 December 2025
- Pre-Start MEET-7691 for traffic complaint, 5 December 2024
- Email to concreters for school hours, 5 December 2024
- Letter from Arterra “Periodic inspections during construction – tree protection certification”, 13 September 2024
- ASCT DGB20 validation report 6-1449-3051 Suite, 13 January 2025
- Certificate of Analysis 369175 prepared by Envirolab Services, 18 December 2024
- Purple Cow waste management report
- Waste Diversion Report prepared by Purple Cow Industries
- Asbestos in Soil Clearance Inspection Report prepared by Trinitas group (LAA001132), dated 4 February 2025
- DPHI approval letter for Auditors, dated 5 November 2024
- Construction Access Report reference: 22103 – issue B, dated 11 December 2024
- Building Plan Assessment approval from Sydney Water, Tap in reference: 1952271, 30 August 2024
- Dial before you dig in (DBYD) notification, job no. 37459211, dated 28 August 2024
- WCC Complaints Register
- WCC Site Induction

6. Audit Findings

6.1 Assessment of Compliance

This audit was completed to assess the implementation of the Construction Environmental Management Plan and Sub-Plans, as well as environmental controls established by Rohrig for the William Clarke College (new Bryson Building), against Development Consent SSD-35715221, Schedule 3 (128 conditions).

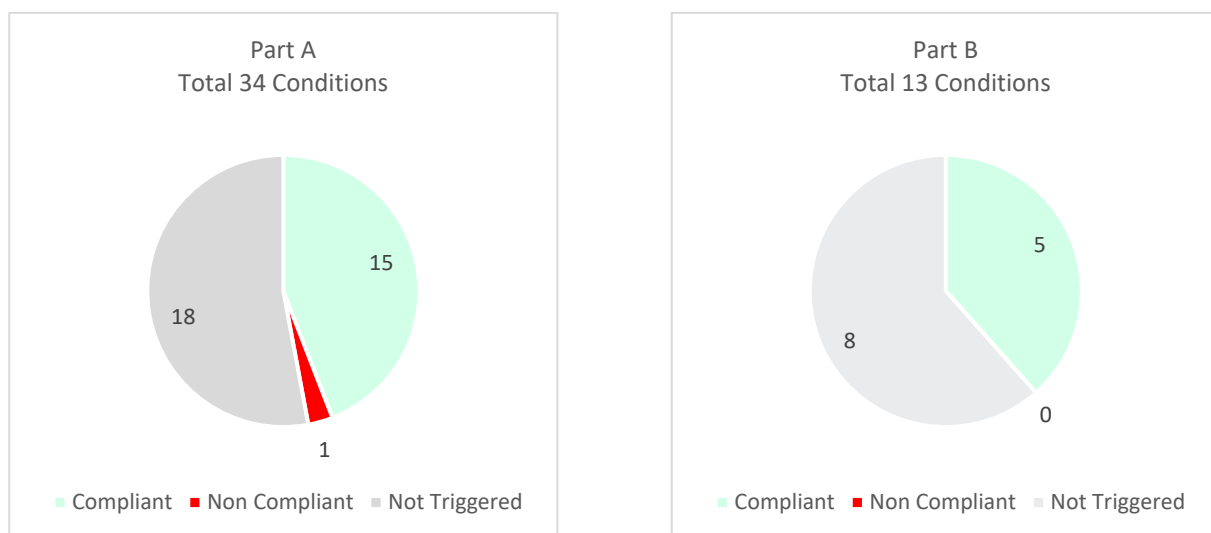
The following table summarises the audit findings by rating category:

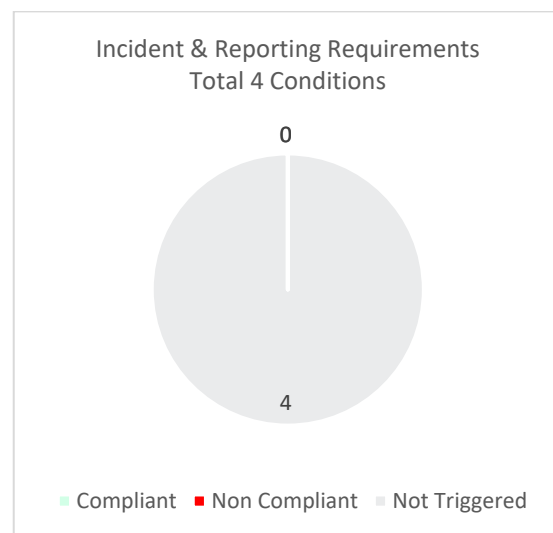
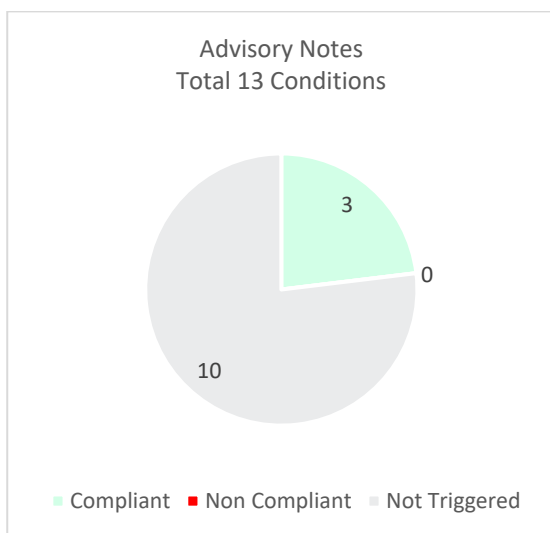
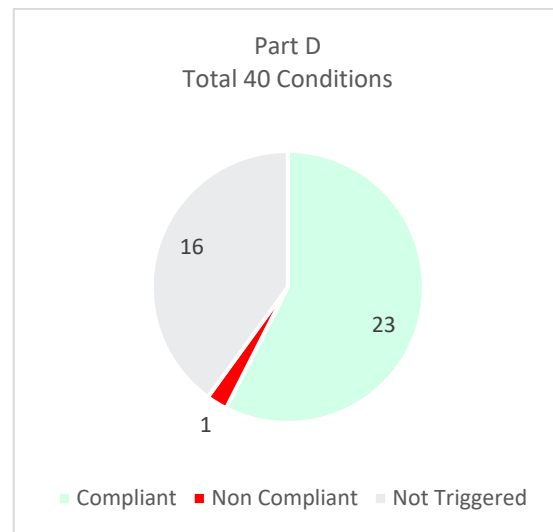
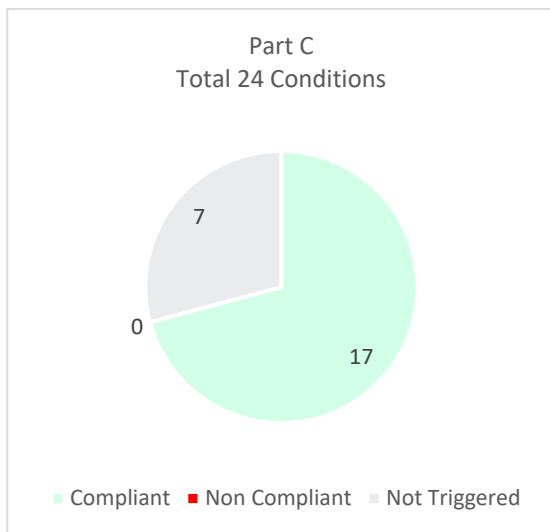
Table 3- Summary of Findings

Findings Rating	Findings
Compliant	63
Non-Compliant	2
Not Triggered	63
Total	128

Table 4- Summary of Findings

The comparison of audit requirements against the compliance ratings is as follows:





6.2 Notices, Incidents and Complaints

6.2.1 Notices and Incidents

Rohrig and MostynCopper confirmed that no agency notices, orders, penalty notices or prosecutions were issued, and no reportable environmental incidents were recorded during the audit period.

6.2.2 Complaints

A Complaints Register is in place where complaint details are recorded. The complaints register is available on the project website and was noted to be updated monthly. One (1) complaint was received during the audit period as follows:

1. A complaint was received via phone call regarding construction vehicle movements during school pick-up times. The action required Rohrig to notify all workers and subcontractors that construction vehicle movements are not permitted during peak school drop-off and pick-up times, which are from 8:00 AM to 8:40 AM and 2:45 PM to 3:45 PM, respectively. Rohrig had to address the issue of construction vehicle movements during toolbox talks. The complaint has been resolved and closed.

6.2.3 Non-Compliances

No self-reported non-compliances occurred during the audit period. Two non-compliances were identified during this audit as follows:

Finding No.	Finding Type	Condition of Consent	Audit Finding Details
WCC-01_ NC-01	Non-Compliance	A2: Terms of Consent The development may only be carried out: <ul style="list-style-type: none"> (a) in compliance with the conditions of this consent 	Based on the non-compliance identified against Condition D1, A2 is triggered as non-compliant. Close out of Condition D1 will automatically address this requirement. Following the audit, photo evidence was provided to fully address Condition D1. This non-compliance is now addressed and considered CLOSED .
WCC-01_ NC-01	Non-Compliance	D1: Site Notice A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purposes of informing the public of project details and must satisfy the following requirements: <ul style="list-style-type: none"> (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 	The Site Notice displayed at the time of the audit did not include the name of the Certifier or Structural Engineer and was therefore deemed non-compliant with the requirements of Condition D1(c). Close out of this non-compliance will be based on the evidence provided showing the new sign installed with updated details to address Condition D1 in full. Following the audit, photo evidence of the new site notice was provided, now displaying the contact details of the Certifier and structural engineer as required by Condition D1. Refer to Photos under Appendix G . This non-compliance is now addressed and considered CLOSED .

6.3 Previous Audit Findings

This is the first independent environmental audit, therefore there are no previous audit findings to note.

6.4 Audit Site Inspection

A site inspection was conducted of the construction areas with representatives of WCC, Rohrig, MostynCopper and APP to review the effectiveness of environmental mitigation measures implemented.

Environmental controls included:

- ▶ Signage in place at site access and contains project details and contact information.
- ▶ Construction vehicles contained within the site boundary.
- ▶ ATF fence installed around the entire site premises.
- ▶ Rumble grid in place with area stabilised. No mud tracking observed.
- ▶ Erosion and sediment controls appeared well maintained.

- ▶ Sediment fences installed with sandbags and coir logs at low point areas.
- ▶ Waste bins available throughout the site.
- ▶ Hazardous materials stored appropriately.
- ▶ Topsoil stockpiles separated from fill material.
- ▶ Water hoses and sprinklers on site for dust suppression.
- ▶ Tree protection zone established with sediment fence around its perimeter
- ▶ Workers onsite wearing adequate PPE

Three (3) observations were identified during the site inspection.

1. The Site Notice displayed did not include the name of the Certifier or Structural Engineer and was therefore deemed non-compliant with the requirements of Condition D1(c). Following the audit, the photo evidence of new site notice has been provided, displaying the contact details of the certifier and structural engineer (refer to NC-02)
2. A spill kit was not available near the chemical storage area. The project team promptly relocated a spill kit next to the storage area, addressing the observation immediately.
3. A general waste bin was placed in front of the fire extinguisher, restricting access. The project team promptly removed the bin to restore clear access to the fire extinguisher.

Photos of the site inspection are included in [Appendix G](#).

6.5 Suitability of Plans and the Environmental Management System

To effectively address the project plan requirements and implement best practice, Rohrig engaged WSP for the development of the CEMP and Sub-Plans for Construction Noise and Vibration Management Sub-Plan, Construction Traffic and Pedestrian Management Sub-Plan, and Construction Soil and Water Management Plan. The plans generally address the impacts and mitigation measures noted in the Environmental Impact Assessment developed for the project. Compliance of the Plans against Consent Conditions SSD-35715221 was verified during the audit as follows:

Construction Environmental Management Plan (CEMP) – Refer to Condition C14

The Rohrig Construction Environmental Management Plan dated 24 October 2024 includes the project information, environmental management compliance, hours of construction work, objectives and targets, risk management, emergency / incident management, communication and consultation, induction and visitor management, subcontractor management, monitoring, and reporting requirements. These aspects were verified during the site inspection and review of SSD-35715221 conditions.

Construction Traffic and Pedestrian Management Sub-Plan (CTPSMP) – Refer to Condition C16

The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) Issue 0, dated 7 September 2024 under [Appendix B of CEMP](#), includes measures and impacts on traffic during the construction of the proposed development. The CTPMSP analysis encompasses factors such as construction vehicle routes, types and volume of vehicles, construction program, emergency vehicle access, traffic and pedestrian management, public transport, and the safety of pedestrians and cyclists during construction. Additionally, the plan outlines measures for pedestrian and traffic management. The controls outlined in CTPMSP were verified during the site inspection and a review of SSD-35715221 conditions Part D – During Construction with a recommendation to include the Driver Code of Conduct as part of the CTPMSP.

Construction Noise and Vibration Management Plan (CNVMP) – Refer to Condition C17

The CNVMP Revision 0 dated 29 August 2024, under Appendix A of CEMP, addresses the consent conditions, regulatory compliance, hours of work, construction noise and vibration criteria, community consultation; contains analysis of noise and vibration in relation to the project, risk assessment and a comprehensive description of mitigation measures to be implemented onsite. The implementation of controls was verified during the review of SSD-35715221 conditions Part D – During Construction with the SiteHive monitor recently installed.

Construction Soil and Water Management Plan (CSWMP) – Refer to Condition C18

The CSWMP Revision 0 dated 15 October 2024, under appendix C of CEMP, addresses the consent conditions, implementation of the erosion and sedimentation controls onsite, flood measures, risk assessment and a comprehensive description of mitigation measures to be implemented onsite. The implementation of controls was verified during the review of SSD-35715221 conditions Part D – During Construction and noted to be well established during the site inspection.

Summary

Implementation of the Construction Environmental Management Plan and Sub-Plans were verified during the review of records and as demonstrated during the site inspection with only minor improvement opportunities identified – refer to Section 6.8 – Audit Findings and Appendix E – Audit Checklist. Based on the outcome of the audit, the current plans and system were deemed suitable for the William Clarke College (new Bryson Building) project.

6.6 Actual vs Predicated Impacts

The project mitigation measures as set out in the Environmental Impact Statement (EIS) and Response to Submissions were reviewed against the actual impacts as follows:

6.6.1 Aboriginal Cultural Heritage

Unexpected finds – Aboriginal heritage procedure has been established and incorporated into the CEMP. No aboriginal heritage has been found to date. Procedures were verified to be in place for all unexpected finds and communicated during the project induction.

6.6.2 Air Quality

No dust generating activities were occurring during the site inspection; water points were available throughout the site for dust suppression where required. Sprinkler system is established along the driveway.

6.6.3 Sustainability

The project intends to seek approval from the Department for an alternative certification process instead of Green Star certification. DFP Planning (Town Planner) has recommended engaging an independent ESD consultant to prepare an alternative framework for DPHI approval and provide an independent review and verification of the approved certification process.

6.6.4 Tree Protection

The Tree Protection Zone (TPZ) is established with a sediment fence around its perimeter. No access to the TPZ was required during this audit period, and no digging has taken place near the protected area. Additionally, no building materials were observed leaning against the TPZ during the site inspection.

6.6.5 Contamination

Unexpected finds – Contamination procedure has been established and incorporated into the CEMP. The demolition of the existing structure has been completed prior to construction of this project. A Detailed Site Investigation report prepared by EI Australia, dated 19 September 2022, did not identify any contamination on site. Ian Swane and Associates has been engaged as Site Auditor.

6.6.6 Noise

WSP developed Construction Noise and Vibration Management Plan. SiteHive is used for real time monitoring; however, as the project has only recently commenced, the data is still being collected. Standard construction hours are currently being adhered to and no Out-of-Hours Work have been required to date. No complaints have been received.

6.6.7 Erosion and Sediment

Erosion and sediment control plan has been established and included within Construction Soil and Water Management Plan, which Rohrig implement onsite including sediment fencing, sandbags, coir logs, and protection of pit drains. No mud tracking was observed on public roads during the site inspection.

6.6.8 Community Engagement

Community Communication Strategy has been developed and a Complaints Register is in place. Only one (1) complaint has been received to date which has been resolved and closed out as evidenced.

6.6.9 Water Quality and Quantity

Drains and MUSIC Models, Stormwater Catchment Plans and Stormwater Management System have been prepared and endorsed by the Council. No Council land or road work has occurred in this audit period due to the development.

6.6.10 Waste

Waste is being managed by 'Purple Cow' onsite. The waste management report, prepared by Purple Cow, covers the period from November 2024 to January 2025 and details the quantities of each waste type along with their respective recycling percentages.

6.6.11 Road and Pedestrian Safety

The Construction Traffic and Pedestrian Management Sub-Plan has been prepared and implemented. Additionally, the Driver Code of Conduct has been developed and put into effect. All construction vehicles are contained within the site. Construction vehicle movements are not permitted during peak school drop-off and pick-up times. Construction parking was observed to be available on site with no permits or work zones required.

6.6.12 Flood Evacuation

WSP developed the Construction Flood Emergency Management Plan. The plan includes evacuation and refugee protocols.

6.7 Key Strengths

The outcome of the audit verified that CPB demonstrated good controls to address environmental impacts. The following key strengths were noted:

- ▶ Tidy condition throughout the site with effective implementation of erosion and sediment controls.
- ▶ Effective communication demonstrated between WCC, Rohrig, and MostynCopper.
- ▶ Proactive response to site inspection observations, with immediate closeout actioned.
- ▶ Rohrig team presented evidence promptly demonstrating strong document control practices.
- ▶ Effective use of the Hammertech system, demonstrated through weekly inspections and consistent record maintenance, despite the recent transition to the platform.

6.8 Audit Findings and Recommendations

Implementation of Rohrig's Construction Environmental Management Plan and Sub-Plans was verified to be in compliance with Development Consent SSD-35715221. Refer to the attached [Appendix E](#) for full details of the completed audit checklist.

Two (2) non-compliances and four (4) opportunities for improvement were identified and are summarised overpage.

Finding No.	Finding Type	Condition of Consent	Audit Finding Details	Close Out
WCC-01_ NC-01	Non-Compliance	A2: Terms of Consent The development may only be carried out: (a) in compliance with the conditions of this consent	Based on the non-compliance identified against Condition D1, A2 is triggered as non-compliant. Close out of Condition D1 will automatically address this requirement.	Following the audit, photo evidence was provided to fully address Condition D1. This non-compliance is now addressed and considered CLOSED .
WCC-01_ NC-01	Non-Compliance	D1: Site Notice A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purposes of informing the public of project details and must satisfy the following requirements: (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	The Site Notice displayed at the time of the audit did not include the name of the Certifier or Structural Engineer and was therefore deemed non-compliant with the requirements of Condition D1(c). Close out of this non-compliance will be based on the evidence provided showing the new sign installed with updated details to address Condition D1 in full.	Following the audit, photo evidence of the new site notice was provided, now displaying the contact details of the Certifier and structural engineer as required by Condition D1. Refer to Photos under Appendix G . This non-compliance is now addressed and considered CLOSED .

Finding No.	Finding Type	Condition of Consent	Audit Finding Details	Close Out
WCC-01_OFI-01	Opportunity for Improvement	<p>C13: Environmental Management Plan Requirements</p> <p>Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> (DPIE April 2020).</p> <p><i>Note: The Environmental Management Plan Guideline is available on the Planning Portal at:</i></p> <p>https://www.planningportal.nsw.gov.au/majorprojects/assessment/post-approval</p> <p><i>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</i></p>	<p>Several of the management plans developed by WSP did not include revision numbers, current details within the document control page, or sign off for approval, with no document control or revision page included within the Flood Management Plan. Throughout the CEMP and sub-plans, there were also broken links and errors in bookmarks.</p> <p>It is understood that the first review of plans is upcoming as part of the 3-monthly cycle. It is therefore recommended to work with WSP in updating to the correct plan references and revisions for traceability purposes.</p>	<p>Following the audit, the CEMP Revision 3, dated 6 February 2025, and Sub-Plans were provided with an updated document control page and the required signatures. Additionally, the broken links have been rectified. This OFI is now addressed and considered CLOSED.</p>
WCC-01_OFI-02	Opportunity for Improvement	<p>C16: The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:</p>	<p>Although a stand-alone document to address Condition C19 has been developed, the Driver Code of Conduct is not appended to the CTPMSP.</p>	<p>Following the audit, CTPMSP Revision 1, dated 6 February 2025 was provided with the updated document control page. The Driver Code of Conduct has been included as per section 5.5 "Driver Code of Conduct". However, the page</p>

Finding No.	Finding Type	Condition of Consent	Audit Finding Details	Close Out
		<ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s); (b) be consistent with the Section 9 - Construction Pedestrian and Traffic Management Plan Methodology (Stage 1) in the Traffic Impact Assessment prepared by Ptc dated 27 June 2023; (c) be prepared in consultation with Council and TfNSW; (d) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; and (e) detail heavy vehicle routes, access and parking arrangements. 	<p>Additionally: as linked to WCC-01_OFI-01 included under Condition C13:</p> <p>The CTPMSP was issued on 7 September 2024; however, it includes the consultation letter from TfNSW dated 16 October 2024. Upon review of the CTPMSP, TfNSW comments appeared to be adequately addressed. As per WCC-01_OFI-01, it is recommended when reviewing and updating the plans, to include the current revision and date as well as the signature for the plan's approval.</p> <p>Given their interrelation, it is recommended to include the Driver Code of Conduct as part of the CTPMSP and consolidate these documents for ease of reference.</p>	<p>numbering is not aligned with the rest of the document. It is recommended that the page numbers be updated during the upcoming plan review, however for the purpose of the audit, this finding has now been addressed and considered CLOSED.</p>
WCC-01_OFI-03	Opportunity for Improvement	C18: The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP)	<p>The current version of the CSWMSP is in draft and word format.</p> <p>It is recommended that when undertaking a review of the management plans as per</p>	<p>Following the audit CSWPM Revision 1, dated 6 February 2025, was provided in pdf format as a finalised version with the required signature.</p>

Finding No.	Finding Type	Condition of Consent	Audit Finding Details	Close Out
			Condition C13, that the CSWMSP is finalised as a pdf version.	This OFI is now addressed and considered CLOSED .
WCC-01_OFI-04	Opportunity for Improvement	D9: Implementation of Management Plans The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	The complaints register, as developed in accordance with the Community Engagement Strategy and available on the project website, included details of the complaint received 28-Nov-24 and actions to be taken to address the complaint. However, there was no date to demonstrate when the complaint was addressed and closed. It is recommended to update the register to include the close out date (5-Dec-24) to demonstrate that actions have been undertaken in a timely manner. It is also recommended to ensure any future complaints include this detail.	Following the audit, the updated Complaints Register was provided which now includes a column for the date closed. This OFI is now addressed and considered CLOSED .

Table 5- Findings

Appendix A- Audit Agenda



The APP Group

Audit Agenda – William Clarke College (new Bryson Building)

Project	Independent Environmental Audit - William Clarke College (SSD-35715221)
Proponent	William Branwhite Clarke College
Project Manager	MostynCopper
Contractor	Rohrig Constructions
Location	Rohrig Constructions Site Office, William Clarke College, Kellyville
Date and Time	6 February 2025 9:30 AM – 4:30 PM
Auditing Team	Barbara Pater (lead auditor) Sanan Qasim (auditing support)
Site contact	Gabriel Reyes, Project Manager, MostynCopper, 0415 398 534
Audit criteria	In accordance with Consent Conditions SSD-35715221 and the <i>Independent Audit Post Approval Requirements</i> (IAPAR 2020)
Audit scope	Within 12-weeks of commencement of construction audit.

Agenda

Item	Time
Opening Meeting <ul style="list-style-type: none"> Confirm scope of the audit, outline the audit process, methodology, timing, access, and resources required. 	9:30 AM – 9:45 AM
Site Walk <ul style="list-style-type: none"> Sight current site activities and provide focus for the review of environmental aspects, impacts and controls. *Focus on dust, noise, traffic control & stockpile management (request from Council) 	9:45 AM – 10:45 AM
Coffee/tea break	10:45 AM – 11:00 AM
Review of Consent Conditions SSD-35715221 Schedule 3 (Conditions of Consent for Stage 1 Works):	

Item	Time
▶ Part A – Administrative Conditions (34 conditions) + Appendix 2, if applicable	11:00 AM – 11:45 AM
▶ Part B – Prior to the Issue of a Construction Certificate (13 conditions)	11:45 AM – 12:15 PM
▶ Part C – Prior to Commencement of Construction (24 conditions)	12:15 PM – 1:00 PM
Lunch break	1:00 PM – 1:45 PM
▶ Part D – During Construction (40 conditions) ▶ Advisory Notes (13 conditions)	1:45 PM – 3:45 PM
Auditor consolidation (auditors only) / Afternoon tea break	3:45 PM – 4:15 PM
Closing meeting ▶ Outcome of audit and presentation of findings. Deliverables as noted below.	4:15 PM – 4:30 PM

Deliverables

Audit Deliverables	Responsibility
Draft Report Submission ▶ 15 days following conduct of independent audit, or following additional documentation/evidence	APP
Response to draft report ▶ 7 days following receipt of draft audit report from APP	WCC/MC
Final report submission ▶ Finalised within 7 days following receipt of comments from WCC/MC ▶ Submitted to WCC/MC	APP
Response to findings and submission of final audit report ▶ Final audit report submitted to DPHI in accordance with SSD-35715221 Conditions D38 and D39.	WCC/MC

Audit Deliverables	Responsibility
Non-Compliances (if applicable) <ul style="list-style-type: none"> ▶ WCC/MC is to follow the process to notify DPHI for any non-compliances identified during the audit as per SSD-35715221 Conditions A30 and A31. 	WCC/MC

Limitations





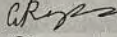
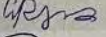
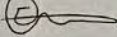

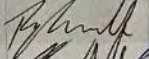
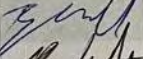
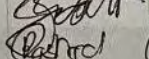
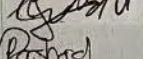





- ▶ The audit will cover the construction requirements only and will therefore be limited to auditing the applicable conditions of Part A, B, C, D and Appendices in accordance with Consent Conditions SSD-35715221.
- ▶ The audit will cover a sampling of records relevant to the scope. APP auditors will apply their professional judgment based on the information made available during the audit.
- ▶ APP will conduct the audit in accordance with the *Independent Auditing Post Approval Requirements* (IAPAR 2020) with the following ratings applied: Compliant, Non-Compliant and Not Triggered, with the option to raise any Opportunities for Improvement.

Request for Information
Records to be provided to the Auditor prior to the audit:
▶ Current Construction/Crown Certificate(s)
▶ Staging Report, if applicable
▶ Current version of the Construction Environmental Management Plan (CEMP)
▶ Current versions of CEMP Sub-Plans (Traffic Management, Noise and Vibration, etc)
▶ Current erosion and sediment control plans / environmental control site maps, etc
▶ Details of any complaints, incidents, non-compliances
▶ Records for any unexpected asbestos / contamination finds

Appendix B – Audit Attendance Sheet

Audit Attendance Sheet

Project	WILLIAM CLARKE COLLEGE (BRYSON BUILDING)	Audit No.	# WCC-07
Auditee	ROHRIG + WCC	Lead Auditor	BARBARA PATER
Location	WILLIAM CLARKE COLLEGE, 10 MORRIS GROVE, KELLYVILLE		
Opening Meeting Date	6 FEBRUARY 2025, 9:30 AM		
Closing Meeting Date	6 FEBRUARY 2025, 3:00 PM		

Name	Organisation	Position	Signature	
			Opening Meeting	Closing Meeting
BARBARA PATER	APP	L. AUDITOR		
Sanan Qasim	APP	A. Auditor		
Gabriel Reyes	Mostyn Copper	Senior PM		
Erica Choo	Mostyn Copper	Assistant PM		
RYAN CARROLL	Mostyn Copper	Project Director		
Andries van der Walt	Kohrig	Site Manager		
Brad Blandford	B Kohrig	Project Manager		
JESUIT GOSLING	Kohrig	Jm Contracts Admin		
MARK ALEXANDER	WCC	PROPERTY MNGR		-
DAVID JENNINGS	WCC	CEO	ON-LINE	Online

Appendix C – Approval of Auditors

Department of Planning, Housing and Infrastructure



NSW Planning ref: SSD-35715221-PA-14

David Jennings
Business Manager
William Branwhite Clarke College
ABN 83169319110
10 Morris Grove
Kellyville, NSW 2155
5 November 2024

Sent via the Major Projects Portal only

Subject: Concept and Stage 1 William Clarke College (SSD-35715221) – Construction Auditor Approval Request

Dear Mr Jennings

Reference is made to your post approval matter, SSD-35715221-PA-14, request for the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Audit of the Concept and Stage 1 William Clarke College (**Project**), submitted as required by Schedule 3, Condition D36 of SSD-35715221 (**Consent**) to the NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) on 18 October 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Schedule 3, Condition D36 of the Consent and the NSW Planning *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team from The APP Group to conduct Independent Audits for the construction phase of the Project:

- Barbara Pater – Lead Auditor
- Grant Brown – Auditor
- Sanan Qasim – Assistant Auditor
- Anita Rylah - Technical Reviewer

Please note that this is an agreement for the audit team listed above for the Project's construction stage only. Notwithstanding the agreement for the above listed audit team, future operational Independent Audits require a request for the agreement to the auditor or audit team be submitted to

Department of Planning, Housing and Infrastructure



NSW Planning, for consideration of the Secretary. If there are any changes to the approved audit organisation, and/or audit team member/s a new request must be submitted and agreed to by the Planning Secretary prior to commencement of the relevant audit.

The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of Consent and the *Independent Audit Post Approval Requirements* (2020). 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 ensure this correspondence is appended to the Independent Audit Report.

Should you wish to discuss the matter further, please contact Brigitte Healey, (Compliance Officer) on 02 8229 2936 or email compliance@planning.nsw.gov.au.

Yours sincerely



Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary

Appendix D – Independent Audit Declarations

Declaration of Independence Form

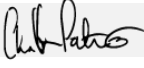
Independent Audit Declaration Form	
Project Name:	William Clarke College Redevelopment
Consent Number:	SSD-35715221
Description of Project:	<p>Redevelopment of the William Clarke College, including:</p> <ul style="list-style-type: none"> • A Concept Proposal comprising: <ul style="list-style-type: none"> ○ Three new building envelopes; ○ Envelope for the extension to an existing building; ○ Relocation of waste and recycling compound; ○ Modified and new vehicle areas and carparking, landscaping; and ○ Increase in student enrolment to 2050 (143 additional) • Stage 1 works comprising: <ul style="list-style-type: none"> ○ Detailed design and construction of a three-four storey building (Bryson Building) ○ Relocation of waste and recycling compound; ○ Amendments to internal vehicle circulation area and car parking, landscape and tree removal; and ○ Increase in student enrolment to 2050 (143 additional).
Project Address:	William Clarke College, 10 Morris Grove, Kellyville
Proponent:	William Branwhite Clarke College
Title of Audit:	Independent Environmental Audit
Date:	13 February 2025

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

- the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2020);
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Independent Audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- 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) 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
- 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 the Auditor:	Barbara Pater
Signature:	
Qualification:	Lead Environmental Auditor
Company:	APP Corporation Pty Ltd
Company Address:	Level 14, 10 Spring Street, Sydney NSW 2000

Declaration of Independence Form


Independent Audit Declaration Form	
Project Name:	William Clarke College Redevelopment
Consent Number:	SSD-35715221
Description of Project:	Redevelopment of the William Clarke College, including: <ul style="list-style-type: none"> • A Concept Proposal comprising: <ul style="list-style-type: none"> ○ Three new building envelopes; ○ Envelope for the extension to an existing building; ○ Relocation of waste and recycling compound; ○ Modified and new vehicle areas and carparking, landscaping; and ○ Increase in student enrolment to 2050 (143 additional) • Stage 1 works comprising: <ul style="list-style-type: none"> ○ Detailed design and construction of a three-four storey building (Bryson Building) ○ Relocation of waste and recycling compound; ○ Amendments to internal vehicle circulation area and car parking, landscape and tree removal; and ○ Increase in student enrolment to 2050 (143 additional).
Project Address:	William Clarke College, 10 Morris Grove, Kellyville
Proponent:	William Branwhite Clarke College
Title of Audit:	Independent Environmental Audit
Date:	13 February 2025

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

- the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2020);
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Independent Audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- 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
- 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 the Auditor:	Sanan Qasim
Signature:	
Qualification:	Assistant Auditor
Company:	APP Corporation Pty Ltd
Company Address:	Level 14, 10 Spring Street, Sydney NSW 2000

Appendix E – Audit Checklist

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
1.	PART A		ADMINISTRATIVE CONDITIONS			
1.1.	A	A1	Obligation to Minimise Harm to the Environment 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.	Based on the outcome of the audit, which consisted of a review of records and documentation, and the results of the site inspection, it appeared that the project has executed measures to mitigate environmental harm. This is reflected in the environmental site controls, adherence to management plan documentation, and compliance with consent conditions demonstrated during the audit. Observations were raised during the audit site inspection. However, these observations were noted to not cause any material harm to the environment at the time of the audit. It was also noted that these observations were closed out during the audit. Refer to site inspection close out photos.		Compliant
1.2.	A	A2	Terms of Consent The development may only be carried out: <ul style="list-style-type: none"> (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS, except where superseded by the Response to Submissions, the additional information, and SSD-35715221-MOD-1; and (d) in accordance with the approved plans in the table below: 	<ul style="list-style-type: none"> (a) Non-compliance identified with Condition D1 of the consent. (b) No written directions from the Planning Secretary required to be complied with. (c) Based on the evidence presented the development is in accordance with the EIS, response to submissions, the additional information and SSD-35715221-MOD-1. (d) Architectural drawings prepared by PMDL Architecture & Design as per website; 	WCC-01_NC-01: Based on the non-compliance identified against Condition D1, A2 is triggered as non-compliant. Close out of Condition D1 will automatically	Non-Compliant (CLOSED)

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating																																																																																								
		<table><tr><th colspan="4">Architectural Plans prepared by <i>PMDL</i></th></tr><tr><th>Dwg No.</th><th>Rev</th><th>Name of Plan</th><th>Date</th></tr><tr><td>DA101</td><td>D</td><td>Stage 1 Demolition Plan</td><td>25/6/24</td></tr><tr><td>DA102</td><td>E</td><td>Stage 1 Site Plan</td><td>6/8/24</td></tr><tr><td>DA110</td><td>D</td><td>Stage 1 Plan -Level 0 (Ground)</td><td>25/6/24</td></tr><tr><td>DA111</td><td>D</td><td>Stage 1 Plan – Level 1</td><td>25/6/24</td></tr><tr><td>DA112</td><td>D</td><td>Stage 1 Plan – Level 2</td><td>25/6/24</td></tr><tr><td>DA113</td><td>D</td><td>Stage 1 Plan – Level 3</td><td>25/6/24</td></tr><tr><td>DA114</td><td>D</td><td>Stage 1 Plan – Roof</td><td>25/6/24</td></tr><tr><td>DA210</td><td>E</td><td>Stage 1 Elevations</td><td>25/6/24</td></tr><tr><td>DA211</td><td>E</td><td>Stage 1 Elevations</td><td>25/6/24</td></tr><tr><td>DA212</td><td>E</td><td>Stage 1 Elevations</td><td>25/6/24</td></tr><tr><td>DA310</td><td>E</td><td>Stage 1 Sections</td><td>25/6/24</td></tr><tr><td>DA311</td><td>E</td><td>Stage 1 Sections</td><td>25/6/24</td></tr><tr><td>DA312</td><td>E</td><td>Stage 1 Sections</td><td>25/6/24</td></tr><tr><td>DA313</td><td>E</td><td>Stage 1 Sections</td><td>25/6/24</td></tr><tr><td>DA610</td><td>C</td><td>Stage 1 – Material Selection</td><td>6/8/24</td></tr><tr><td>DA104</td><td>B</td><td>End of Trip Facilities</td><td>6/8/24</td></tr><tr><td>DA-C12</td><td>A</td><td>Concept Master Plan – EOT Facilities</td><td>24/5/23</td></tr><tr><th colspan="4">Landscape Plans prepared by <i>Arterra Landscape Architects</i></th></tr><tr><th>Dwg No.</th><th>Rev</th><th>Name of Plan</th><th>Date</th></tr><tr><td>SD-13</td><td>B</td><td>Stage 1 – Landscape</td><td>12/6/24</td></tr></table>	Architectural Plans prepared by <i>PMDL</i>				Dwg No.	Rev	Name of Plan	Date	DA101	D	Stage 1 Demolition Plan	25/6/24	DA102	E	Stage 1 Site Plan	6/8/24	DA110	D	Stage 1 Plan -Level 0 (Ground)	25/6/24	DA111	D	Stage 1 Plan – Level 1	25/6/24	DA112	D	Stage 1 Plan – Level 2	25/6/24	DA113	D	Stage 1 Plan – Level 3	25/6/24	DA114	D	Stage 1 Plan – Roof	25/6/24	DA210	E	Stage 1 Elevations	25/6/24	DA211	E	Stage 1 Elevations	25/6/24	DA212	E	Stage 1 Elevations	25/6/24	DA310	E	Stage 1 Sections	25/6/24	DA311	E	Stage 1 Sections	25/6/24	DA312	E	Stage 1 Sections	25/6/24	DA313	E	Stage 1 Sections	25/6/24	DA610	C	Stage 1 – Material Selection	6/8/24	DA104	B	End of Trip Facilities	6/8/24	DA-C12	A	Concept Master Plan – EOT Facilities	24/5/23	Landscape Plans prepared by <i>Arterra Landscape Architects</i>				Dwg No.	Rev	Name of Plan	Date	SD-13	B	Stage 1 – Landscape	12/6/24	<ul style="list-style-type: none">• Stage 1 Demolition Plan, Dwg no. DA101 issue D, dated 25 June 2024• Stage 1 Site Plan, Dwg no. DA102 issue D, dated 6 August 2024• Stage 1 Plan – Level 0, Dwg no. DA110 issue D, dated 25 June 2024• Stage 1 Plan – Level 1, Dwg no. DA111 issue D, dated 25 June 2024• Stage 1 Plan – Level 2, Dwg no. DA112 issue D, dated 25 June 2024• Stage 1 Plan – Level 3, Dwg no. DA113 issue B, dated 16 September 2022• Stage 1 Plan – Roof, Dwg no. DA114 issue E, dated 25 June 2024• Stage 1 Elevations, Dwg no. DA210 issue E, dated 25 June 2024• Stage 1 Elevations, Dwg no. DA211 issue E, dated 25 June 2024• Stage 1 Elevations, Dwg no. DA212 issue E, dated 25 June 2024• Stage 1 Sections, Dwg no. DA310 issue E, dated 25 June 2024• Stage 1 Sections, Dwg no. DA311 issue E, dated 25 June 2024• Stage 1 Sections, Dwg no. DA312 issue E, dated 25 June 2024• Stage 1 Sections, Dwg no. DA313 issue E, dated 25 June 2024• Stage 1 – Material Selection, Dwg no. DA610 issue c, dated 6 August 2024• End of Trip Facilities, Dwg no. DA104 issue B, dated 6 August 2024	address this requirement. Following the audit, photo evidence was provided to fully address Condition D1. This non-compliance is now addressed and considered CLOSED .	
Architectural Plans prepared by <i>PMDL</i>																																																																																													
Dwg No.	Rev	Name of Plan	Date																																																																																										
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13 ID No	SSD Part & Req. No.		SSD Requirement				Audit Evidence	Audit Findings/ Recommendations	Compliance rating
					Ground Level		<ul style="list-style-type: none">• Concept Master Plan – EOT Facilities, Dwg no. DA-C12 issue A, dated 24 May 2023• Stage 1 – Landscape Ground Level, Dwg no. SD-13 issue B, dated 12 June 2024• Stage 1 – Upper Levels, Dwg no. SD-14 issue B, dated 12 June 2024• Tree Schedule and Character Images, Dwg no. SD-16 issue B, dated 12 June 2024• Stage 1 Plant Schedule & Character Images, Dwg no. SD-17 issue B, dated 12 June 2024• Typical Landscape Details, Dwg no. SD-18 issue B, dated 12 June 2024• Typical Landscape Details, Dwg no. SD-19 issue B, dated 12 June 2024• Typical Landscape Details, Dwg no. SD-20 issue B, dated 12 June 2024		
			SD-14	B	Stage 1 – Upper Levels	12/6/24			
			SD-16	B	Tree Schedule and Character Images	12/6/24			
			SD-17	B	Stage 1 Pant Schedule & Character Images	12/6/24			
			SD-18	B	Typical Landscape Details	12/6/24			
			SD-19	B	Typical Landscape Details	12/6/24			
			SD-20	B	Typical Landscape Details	12/6/24			
1.3.	A	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.				No written directions received. Sighted submission of CEMP and Sub-Plans dated 10 September 2024 to DPHI. Sighted post approval receipt SSD-35715221-PA-2, dated 10 September 2024.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
1.4.	A	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 Schedule 3 condition <u>A2(c)</u> or Schedule 3 condition <u>A2(d)</u> . In the event of an inconsistency, ambiguity or conflict between any of the documents listed in Schedule 3 condition <u>A2(c)</u> and Schedule 3 condition A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	No inconsistencies, ambiguity or conflict identified with regards to the EIS, RtS or Mod-1.		Not Triggered
1.5.	A	A5	Limits of Consent This consent lapses five years after the date of consent unless works are physically commenced.	Works have physically commenced. Consent has not lapsed.		Compliant
1.6.	A	A6	This consent does not permit any increase in primary-aged student population (approved under this consent) prior to the completion of the car park proposed as part of the Stage 1 works and the implementation of the Operational Transport and Access Management Plan (Schedule 3 condition <u>E12</u>).	Primary school car park falls under Stage 2 as per Construction Management Plan by Rohrig (timeframe ~4weeks) As per evidence provided from WCC Payroll Manager via email on 6 February 2025: the number of primary students as of 6 February 2025 is a total of 672 students. The actual Primary School student population on 22 November 2024 was 694 students. The decrease in student numbers is due to the enrolment of new kindergarten students and the departure of Year 6 students. For new primary students, the College receives signed enrolment contracts before the end of the year, and they are therefore considered enrolled for student number calculations. The departure of Year 6 students in the new		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				year results in a reduction in the overall student population.		
1.7.	A	A7	Student and Staff number The maximum student and staff population permitted at the school at any one time must not exceed 2050 students (143 additional) and 226 full time equivalent staff.	As confirmed by WCC Payroll Manager (email dated 6 February 2025), the total number of students across Prep, Primary, and Secondary is 1,921 as at 6 February 2025, which remains within the permitted limit of 2,050 as per the condition. As of 6 February 2025, the recorded on-site staff number on Micropay payroll is 221.46 FTE. The calculations account for staff on leave, remote work, and other adjustments, ensuring an accurate representation of staff presence and within the limits of condition A7.		Compliant
1.8.	A	A8	Prescribed Conditions The Applicant must comply with all relevant prescribed conditions of development consent under Part 4, Division 2 of the EP&A Regulation as of the date of this consent.	Two Construction Certificates have been issued by Steve Watsons & Partners to date as follows: <ul style="list-style-type: none"> Construction Certificate No. 23/0296/01, dated 22 November 2024 - site wide civil works, inground services, stormwater works, inground structure / substructure including the construction of the ground floor concrete slab only. Construction Certificate No. 23/0296/02, dated 15 January 2025 - Works proceeding from CC1, which includes the erection of the buildings full structure only. 		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				The project will have further construction certificates for the installation of services, remaining building works, car parking construction and relocation of the waste storage area.		
1.9.	A	A9	Planning Secretary as Moderator 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.	No disputes between the Applicant and a public authority have occurred to the date of the audit.		Not Triggered
1.10.	A	A10	Evidence of Consultation Where conditions of this consent require consultation with an identified party, the Applicant must: <ul style="list-style-type: none"> (a) consult with the relevant party prior to submitting the subject document for information or approval; and (b) provide details of the consultation undertaken including: <ul style="list-style-type: none"> i) the outcome of that consultation, matters resolved and unresolved; and ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved. 	The following conditions of this consent requiring consultation are as follows: <ul style="list-style-type: none"> - B4 Stormwater Management Plan with Council - B11 Public Domain Works with Council - C16 CTPMSP with Council and TfNSW - C18 CSWMSP with Council - D27 Unexpected Finds with Heritage NSW (where applicable). Compliance was reviewed and verified against these conditions.		Compliant
1.11.	A	A11	Staging The project may be constructed and operated in stages in accordance with the terms/conditions of this consent and the details set out in Construction Management Plan dated 26	Staging as per Construction Management Plan:		Compliant

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
		September 2022 prepared by Rohrig.	<p>Stage 1 - Site Compound and New Waste Compound (commencing later but will finish earlier)</p> <p>Timeframe - 2 weeks</p> <ul style="list-style-type: none"> • Site access off Morris Grove (Gate 14), internal construction driveways, carparking and compounds established. • New waste compound constructed to enable decommissioning of Wrights Road waste compound. <p>Stage 2 – Primary School carpark. (commencing later but will finish earlier)</p> <p>Timeframe – 4 weeks</p> <ul style="list-style-type: none"> • Preliminary works in primary carpark to commence during which time drop-off and pickup can continue to occur (but no parking). Teacher parking to be temporarily redirected to the Sports Centre and student carpark off Morris Grove. • Bus drop-off and pickup via Morris Grove remains unchanged. • Carpark upgrade to be completed in school holiday break wherever practicable or otherwise managed to be undertaken outside of drop-off and pickup times. • New carpark can commence operations. <p>Stage 3 – Bryson Building Construction. (Rohrig only)</p> <p>Timeframe - 14-16 months</p>		

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				<p>All demolition and construction works to be undertaken with access via the site compound and internal access via the centre of the site.</p> <ul style="list-style-type: none"> • Student and staff access between the east and west parts of the site to be via temporary pedestrian bridges over the internal construction site driveway. <p>The waste compound and primary school park works will be delivered separately and are expected to be completed before the Bryson building.</p> <p>Rohrig's scope of works will be limited to the Bryson Building.</p>		
1.12.	A	A12	Staging of the proposed development may be varied (for either construction or operation) in accordance with a revised Staging Report submitted to and approved by the Planning Secretary.	Staging Report is not applicable for this project.		Not Triggered
1.13.	A	A13	<p>Any revised Staging Report prepared in accordance with Schedule 3 condition <u>A12</u> must:</p> <ul style="list-style-type: none"> (a) be generally consistent with Construction Management Plan dated 26 September 2022 prepared by Rohrig; (b) 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 	Staging Report is not applicable for this project.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>will commence and finish;</p> <p>(c) if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant);</p> <p>(d) specify how compliance with conditions will be achieved across and between each of the stages of the project;</p> <p>(e) specify how compliance with independent auditing requirements will be achieved across and between each of the operational stages of the project; and</p> <p>(f) set out mechanisms for managing any cumulative impacts arising from the proposed staging.</p>			
1.14.	A	A14	<p>The project must be staged in accordance with the details approved under Schedule 3 condition <u>A11</u> unless a revised Staging Report has been approved under Schedule 3 condition <u>A12</u> in which case the project must be staged in accordance with the approved revised Staging Report.</p>	<p>Staging as per Construction Management Plan:</p> <p>Stage 1 - Site Compound and New Waste Compound (commencing later but will finish earlier)</p> <p>Timeframe - 2 weeks</p> <ul style="list-style-type: none"> • Site access off Morris Grove (Gate 14), internal construction driveways, carparking and compounds established. 		Compliant

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<ul style="list-style-type: none"> • New waste compound constructed to enable decommissioning of Wrights Road waste compound. <p>Stage 2 – Primary School carpark. (commencing later but will finish earlier) Timeframe – 4 weeks</p> <ul style="list-style-type: none"> • Preliminary works in primary carpark to commence during which time drop-off and pickup can continue to occur (but no parking). Teacher parking to be temporarily redirected to the Sports Centre and student carpark off Morris Grove. • Bus drop-off and pickup via Morris Grove remains unchanged. • Carpark upgrade to be completed in school holiday break wherever practicable or otherwise managed to be undertaken outside of drop-off and pickup times. • New carpark can commence operations. <p>Stage 3 – Bryson Building Construction. (Rohrig only) Timeframe - 14-16 months</p> <p>All demolition and construction works to be undertaken with access via the site compound and internal access via the centre of the site.</p> <ul style="list-style-type: none"> • Student and staff access between the east and west parts of the site to be via temporary 		

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				<p>pedestrian bridges over the internal construction site driveway.</p> <p>The waste compound and primary school park works will commence soon and are expected to be completed before the Bryson building.</p> <p>Rohrig's scope of works will be limited to the Bryson building.</p>		
1.15.	A	A15	The terms of this approval that apply or are relevant to the works or activities to be carried out in a specific stage set out in the details as approved under Schedule 3 condition <u>A11</u> or a revised Staging Report approved under Schedule 3 condition <u>A12</u> , must be complied with at the relevant time for that stage including independent auditing requirements.	Staging Report is not applicable for this project.		Not Triggered
1.16.	A	A16	<p>Structural Adequacy</p> <p>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.</p> <p><i>Note: Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development.</i></p>	<p>Structural Engineering Design Certificate and Associated Drawings prepared by Birzulis Associates Pty Ltd, dated 9 October 2024.</p> <p>This Certificate is referenced under Construction Certificate CC1 – Item 9.</p> <p>Structural Engineering Design Certificate and Associated Drawings prepared by Birzulis Associates Pty Ltd, dated 14 October 2024.</p> <p>This Certificate is referenced under Construction Certificate CC2 – Item 7.</p>		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
1.17.	A	A17	<p>Staging, Combining and Updating Strategies, Plans or Programs</p> <p>The Applicant may:</p> <ul style="list-style-type: none"> (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 	No combination or updates to strategies, plans or programs required to date. The CEMP and Sub-Plans are required to be updated every 3 months (timeframe still upcoming). This condition is not yet triggered.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			development).			
1.18.	A	A18	Any strategy, plan or program prepared in accordance with Schedule 3 condition <u>A17</u> , where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary.	No combination or updates to strategies, plans or programs required to date. The CEMP and Sub-Plans are required to be updated every 3 months (timeframe still upcoming). This condition is not yet triggered.		Not Triggered
1.19.	A	A19	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.	No combining or updating of plans or programs triggered by condition A13.		Not Triggered
1.20.	A	A20	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.	No updates to strategies, plans of programs.		Not Triggered
1.21.	A	A21	External Walls and Cladding The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	External walls and cladding will fall under Construction Certificate CC4.		Not Triggered
1.22.	A	A22	External Materials The external colours, materials and finishes of the buildings must be consistent with the approved plans referenced in Schedule 3 condition <u>A2</u> . Any minor changes to the colour and finish of approved external materials may be approved by the Certifier provided: (a) the alternative colour/material is of a similar	External Materials will fall under Construction Certificate CC4.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>tone/shade and finish to the approved external colours/building materials;</p> <p>(b) the quality and durability of any alternative material is the same standard as the approved external building materials; and</p> <p>(c) a copy of any approved changes to the external colours and/or building materials is provided to the Planning Secretary for information.</p>			
1.23.	A	A23	<p>Applicability of Guidelines</p> <p>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.</p>	WCC Building Spec accessible for team on Procure. Sighted the PMDL Building Specifications document, Revision A, dated 5 April 2024, which includes general requirements, environmental management, and building specifications.		Compliant
1.24.	A	A24	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.	No written directions issued by DPHI.		Not Triggered
1.25.	A	A25	<p>Monitoring and Environmental Audits</p> <p>Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-</p>	SiteHive is used for real time monitoring; however, as the project has only recently commenced, the data is still being collected. Noise monitor is in place as directed by Douglas Partners. Refer to photo.		Compliant

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
		<p>compliance notification, Site audit report and independent auditing.</p> <p><i>Note: For the purposes of this condition, as set out in the EP&A Act, “monitoring” is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an “environmental audit” is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i></p>	<p>This is the first independent audit of the project which has been conducted within 12-weeks of commencement of construction as per IAPAR 2020 guidelines.</p>		
1.26.	A	<p>A26 Access to Information</p> <p>At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <ul style="list-style-type: none"> (a) make the following information and documents (as they are obtained or approved) publicly available on its website: <ul style="list-style-type: none"> i) the documents referred to in SCHEDULE 3 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; 	<ul style="list-style-type: none"> (a) The William Clarke College (new Bryson Building) project website developed and was verified to include the following: <ul style="list-style-type: none"> (i) Development Consent SSD-35715221 dated 20 October 2023; EIS and response to submissions. (ii) Construction Certificates CC 22-0296-01 & CC 23-0296-02 available on website (iii) Approved drawings, CEMP, CTMP, Soil Erosion and Sediment Controls Plan, etc (iv) Construction has recently commenced, regular reporting has not yet begun. (v) Noise monitoring has recently commenced, and the project is still gathering data; therefore, noise 		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>viii) a complaints register, updated monthly;</p> <p>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;</p> <p>x) any other matter required by the Planning Secretary; and</p> <p>(b) keep such information up to date, to the satisfaction of the Planning Secretary, and publicly available for 12 months after the completion of operations.</p>	<p>monitoring report has not yet prepared.</p> <p>(vi) Monthly Project Update for December 2024 and January 2025.</p> <p>(vii) Link to the Contact Details for Queries and Complaints</p> <p>(viii) Complaints Register – 1 Complaint received for construction vehicle movement during after school pick-up on 28 November 2024.</p> <p>(ix) This is the first Independent audit of the development.</p> <p>(x) No written directions from DPHI.</p>		
1.27.	A	A27	<p>Compliance</p> <p>The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.</p>	<p>Sighted Site-Specific Induction, covering the following topics:</p> <ul style="list-style-type: none"> • Site access • Working hours • Site parking • Site overview • Legend • Site sign-in – Hammertech • Working with children check • Site amenities • First aid • Student pedestrian bridge • Student access path 		Compliant

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<ul style="list-style-type: none"> • Site emergency procedures • Site communication and consultation • Site rules • Deliveries • Crane & boom pump • Complaints management • Green Star requirements • Waste management • Weekly inspections • Hazardous materials storage & handling • Refuelling procedure and spill response • Dust and emissions mitigation • Noise and vibration mitigation • Unexpected findings <p>The induction is stored in Hammertech. All licenses and required approvals are also stored in Hammertech, and workers are only permitted on-site after verification.</p> <p>Sighted Hammertech record for plumber, unique code: 866462, including:</p> <ul style="list-style-type: none"> • Construction induction card license: CGI00874686SEQ1 (Issue date: 7 June 2006) 		

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				<ul style="list-style-type: none"> Working with children approval (Expiry: 10 September 2026) – WWC2354702E (WWC Number) <p>Induction completion and sign-off were noted on the Hammertech dashboard.</p> <p>The SSD conditions of consent is included in the subcontractor pack. Sighted subcontractor pack provided to façade contractor Locker Group, dated 24 January 2025.</p>		
1.28.	A	A28	Incident Notification, Reporting and Response 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.	No incidents have occurred to date.		Not Triggered
1.29.	A	A29	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 1.	No incidents have occurred to date.		Not Triggered
1.30.	A	A30	Non-Compliance Notification The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance.	<p>No non-compliances were reported during the audit period. Two (2) non-compliances were raised against Conditions A2 and D1 and during this audit on 6 February 2025.</p> <p>Sighted non-compliance notification to the DPHI, dated 12 February 2025.</p> <p>Sighted post approval receipt SSD-35715221-PA-18, dated 12 February 2025,</p>		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				provided as additional evidence following the audit.		
1.31.	A	A31	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.	No non-compliances were reported during the audit period. Notification of the identified non-compliances during this audit included the application number of the development, SSD-35715221. It stated that the non-compliance was raised against D1 – Site Notices due to the absence of the Certifier's name and the Structural Engineer's name on the site sign, which also raised a non-compliance with Condition A2(a). The notification also indicated that corrective action was taken on 6 February 2025 by ordering a new sign with the required details. The sign was delivered to the site on 10 February 2025 and installed on the same day.		Not Triggered
1.32.	A	A32	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Non-compliances have not been notified as an incident. No incidents to date.		Not Triggered
1.33.	A	A33	Revision of Strategies, Plans and Programs Within three months of: <ul style="list-style-type: none"> (a) the submission of an incident report under Schedule 3 Condition A28; (b) the submission of an Independent Audit under Schedule 3 condition D36; (c) the approval of any modification of the conditions of this consent; or 	No revision of strategies, plans or programs required. <ul style="list-style-type: none"> (a) No incidents have occurred to date (b) This is the first independent environmental audit of the development 		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			(d) the issue of a direction of the Planning Secretary under Schedule 3 condition A2(b) 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.	(c) Modification (Mod-1) occurred prior to works commencing with none required during the audit period (d) No directions from DPHI received		
1.34.	A	A34	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>	No revision of strategies, plans or programs required during this audit period.		Not Triggered
2.	PART B		PRIOR TO THE OF A CONSTRUCTION CERTIFICATE			
2.1.	B	B1	External Walls and Cladding Prior to the issue of any relevant construction certificate, 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	External walls and cladding will fall under Construction Certificate CC4.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			Secretary within seven days after the Certifier accepts it.			
2.2.	B	B2	Drains and MUSIC models Prior to the issue of any construction certificate, the Applicant must prepare and submit electronic copies of the Drains and MUSIC models to Council and obtain endorsement, to ensure that the street drainage network can accommodate the development.	MUSIC – Model for Urban Stormwater Improvement Conceptualisation. The plans and designs were initially submitted to the Hills Shire Council on 29 August 2024. Sighted engineering documentation endorsement letter from the Hills Shire Council, dated 21 November 2024, with an endorsement date of 20 November 2024 in accordance with Conditions B2-B4.		Compliant
2.3.	B	B3	Stormwater catchment plans Prior to the issue of any relevant construction certificate for drainage works, the Applicant must prepare and submit stormwater catchment plans to Council and obtain endorsement to ensure that the site accommodates the appropriate upstream catchments	As per Condition B2, plans and designs were initially submitted to the Hills Shire Council on 29 August 2024. Sighted engineering documentation endorsement letter from the Hills Shire Council, dated 21 November 2024, with an endorsement date of 20 November 2024 in accordance with Conditions B2-B4.		Compliant
2.4.	B	B4	Stormwater Management System Prior to the issue of any relevant construction certificate, the Applicant must design an operational stormwater management system for the development in accordance with Council's	The plans and designs were initially submitted to the Council on 29 August 2024. Sighted the engineering documentation endorsement letter from the Council, dated 21 November 2024, with an endorsement		Compliant

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating																																				
		<p>requirements, in consultation with Council and submit it to the Certifier for approval. The system must:</p> <p>(a) be designed by a suitably qualified and experienced person(s) incorporating the results of Drains and MUSIC models in accordance with Schedule 3 condition <u>B2</u>;</p> <p>(b) incorporate details of the endorsed stormwater catchment plans required by Schedule 3 condition <u>B3</u>;</p> <p>(c) be generally in accordance with the conceptual design in the EIS, except where superseded by SSD-35715221-MOD-1, as listed in the following plans:</p> <table><tr><th colspan="4">Civil Works Concept Plan prepared by <i>Birzulis Associates</i></th></tr><tr><th>Dwg No.</th><th>Rev</th><th>Name of Plan</th><th>Date</th></tr><tr><td>C.03</td><td>P5</td><td>Soil Erosion and Sediment Control Plan – Stage 1</td><td>26/06/24</td></tr><tr><td>C.04</td><td>P4</td><td>Soil Erosion and Sediment Control Details</td><td>26/06/24</td></tr><tr><td>C.05</td><td>P5</td><td>Stage 1 – Stormwater Drainage Concept Plan – Overall Site</td><td>26/06/24</td></tr><tr><td>C.06</td><td>P5</td><td>Stage 1 – Civil Works Concept Plan – Sheet 01</td><td>26/06/24</td></tr><tr><td>C.07</td><td>P4</td><td>Stage 1 – Civil Works Concept Plan – Sheet 02</td><td>26/06/24</td></tr><tr><td>C.08</td><td>P4</td><td>Stage 1 – Civil Works Concept Plan – Sheet 03</td><td>26/06/24</td></tr><tr><td>C.09</td><td>P4</td><td>Details Sheet 1 -</td><td>26/06/24</td></tr></table>	Civil Works Concept Plan prepared by <i>Birzulis Associates</i>				Dwg No.	Rev	Name of Plan	Date	C.03	P5	Soil Erosion and Sediment Control Plan – Stage 1	26/06/24	C.04	P4	Soil Erosion and Sediment Control Details	26/06/24	C.05	P5	Stage 1 – Stormwater Drainage Concept Plan – Overall Site	26/06/24	C.06	P5	Stage 1 – Civil Works Concept Plan – Sheet 01	26/06/24	C.07	P4	Stage 1 – Civil Works Concept Plan – Sheet 02	26/06/24	C.08	P4	Stage 1 – Civil Works Concept Plan – Sheet 03	26/06/24	C.09	P4	Details Sheet 1 -	26/06/24	<p>date of 20 November 2024 in accordance with Conditions B2-B4.</p> <p>Sighted the submission of Council endorsement letter to certifier ‘WCC Submission – Council Endorsement’, dated 21 November 2024, which was approved under CC1 on 22 November 2024.</p>		
Civil Works Concept Plan prepared by <i>Birzulis Associates</i>																																									
Dwg No.	Rev	Name of Plan	Date																																						
C.03	P5	Soil Erosion and Sediment Control Plan – Stage 1	26/06/24																																						
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13 ID No	SSD Part & Req. No.		SSD Requirement				Audit Evidence	Audit Findings/ Recommendations	Compliance rating
					Stormwater				
			C.10	P4	Details Sheet 2 - Civil	26/06/24			
			C.11	P4	Details Sheet 3 - Civil	26/06/24			
			<p>(d) be in accordance with applicable Australian Standards;</p> <p>(e) 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; and</p> <p>(f) be approved by the Certifier.</p>						
2.5.	B	B5	Operational Noise – Design of Mechanical Plant and Equipment Prior to the issue of any relevant construction certificate for the mechanical plant and equipment: <p>(a) a detailed assessment of mechanical plant and equipment with compliance with the recommended project noise trigger levels identified in the Stage 1 Works Noise and Vibration Impact Assessments dated 20 March 2023 and prepared by SLR Consulting Australia Pty Ltd 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 Schedule 3 condition <u>B5(a)</u> have been incorporated into the design to ensure the development will not exceed the recommended project noise trigger levels</p>				This condition will fall under Construction Certificate CC3.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			identified in the Stage 1 Works Noise and Vibration Impact Assessments dated 20 March 2023 and prepared by SLR Consulting Australia Pty Ltd. Operational Waste Storage and Processing			
2.6.	B	B6	<p>Prior to the issue of any relevant construction certificate for waste storage and processing areas, the Applicant must demonstrate and obtain approval from the Certifier, that the design of the relocated operational waste storage area on Morris Grove:</p> <ul style="list-style-type: none"> (a) can accommodate the operational waste requirements specified in the Operational Waste Management plan (Rev F), prepared by Elephant's Foot dated 27 June 2024; (b) is constructed using solid non-combustible materials; (c) 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; (d) includes a hot and cold water supply with a hose through a centralised mixing valve; (e) is naturally ventilated or an air handling exhaust system must be in place; and (f) includes signage to clearly describe the types of materials that can be deposited into recycling bins and general garbage bins. 	<p>This condition will fall under Construction Certificate CC3.</p> <p>Operational waste report states:</p> <ul style="list-style-type: none"> • Equipment: 8m3 compactor unit (general waste); 2 x 4.5m2 bins (paper/cardboard recycling); Bin lifting/moving apparatus – total estimated area required: >33m2 • All doorways and passageways facilitating the movement of bins and/or bulky waste items must be at least 1500mm wide. • To ensure staff safety, all bins should be arranged so they can be accessed without moving another bin. 		Not Triggered
2.7.	B	B7	<p>Prior to the issue of any relevant construction certificate for waste storage and processing areas, the Applicant must demonstrate and obtain approval from the Certifier that the bin</p>	<p>This condition will fall under Construction Certificate CC3.</p>		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			carting routes between the school buildings and the central waste collection area comply with the Operational Waste Management plan (Rev F), prepared by Elephant's Foot dated 27 June 2024.	<p>The routes along the bin moving path should (OWMP Section 10):</p> <ul style="list-style-type: none"> • Allow for a continuous route that is wholly within the property boundary. • Be free from obstruction and obstacles such as steps and kerbs. • Be constructed of solid materials with a non-slip surface • Be A minimum of 300mm wider than the largest bin used onsite. • If bins are moved manually, the route must not exceed a grade of 1:14. • If a bin moving device is used, the route cannot exceed the maximum operating grade of the device. This is typically a grade of 1:4, however this will vary depending on the model of bin moving device acquired for the site. 		
2.8.	B	B8	<p>Car Parking and Service Vehicle Layout</p> <p>Prior to the issue of any relevant construction certificate for car parking and service vehicle parking / loading / unloading areas, evidence must be submitted to, and approval obtained from the Certifier, that the operational access and parking arrangements comply with the following requirements:</p> <p>(a) all vehicles can enter and leave the site in a forward direction;</p>	This condition is not yet triggered and will fall under a separate Construction Certificate.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>(b) a minimum of 314 on-site car parking spaces are included for use during operation of the development;</p> <p>(c) 54 new car parking spaces in the Stage 1 primary carpark (out of the 314 car parking spaces) are designed in accordance with the latest versions of AS 2890.1 and AS 2890.6; and</p> <p>(d) the swept path of the longest vehicle entering and exiting the site (including the waste collection vehicle, being a Heavy Rigid Vehicle) in association with the new work, as well as manoeuvrability through the site, are in accordance with the latest version of AS 2890.2.</p>			
2.9.	B	B9	<p>Bicycle Parking and End-of-Trip Facilities</p> <p>Prior to the issue of any relevant construction certificate, the following design details in relation to the secure bicycle parking and end-of-trip facilities must be submitted to and approval obtained from the Certifier:</p> <p>(a) the provision of a minimum seven staff and 48 visitor/student bicycle parking spaces outlined in plans listed in Schedule 3 condition A2;</p> <p>(b) compliance of the layout, design and security of bicycle facilities with the minimum requirements of the latest version of AS 2890.3:2015 Parking facilities - Bicycle parking; and</p> <p>(c) the provision of end-of-trip facilities for staff.</p>	This condition is not yet triggered.		Not Triggered
2.10.	B	B10	<p>Geotechnical Report</p> <p>Prior to the issue of any relevant construction certificate, evidence must be provided and be approved by the Certifier, demonstrating that the construction certificate plans include the</p>	JK Geotechnics were engaged during the tender process; Rohrig then engaged Douglas Partners prior to Construction Certificate CC1.		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			design recommendations of the Geotechnical Investigation prepared by JK Geotechnics dated 8 August 2022.	Sighted Investigation Report reference: R.001.Rev0R.001.Rev0, project no. 71317.02, dated 25 July 2024. The report was approved under CC1 on 22 November 2024.		
2.11.	B	B11	Public Domain Works Prior to the issue of any relevant construction certificate for footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifier that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from Council to the Certifier. <i>Note: Separate construction certificate applications under the Roads Act 1993 are required to be submitted and approved by the relevant roads authority for roadworks or works within the public domain.</i>	No public domain works have occurred to date.		Not Triggered
2.12.	B	B12	Roadworks/Intersection works and Access Prior to the issue of any relevant construction certificate for roadworks and access, the Applicant must submit design plans to and obtain approval from the relevant roads authority, which demonstrate that the proposed accesses to the development are designed to accommodate the turning path of a Heavy Rigid vehicle. <i>Note:</i> <ul style="list-style-type: none"> Approval must be obtained for roadworks under section 138 of the Roads Act 1993. 	This condition will fall under primary carpark construction as entrance will be relocated. Timing is not yet triggered.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<ul style="list-style-type: none"> 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. 			
2.13.	B	B13	Development Contributions Prior to the issue of any construction certificate, a payment of a levy of 1% of the proposed cost of carrying out the Stage 1 development must be paid to Council under section 7.12 of the EP&A Act.	Sighted Long Service Levy receipt no. 7541562, dated 18 July 2024. Sighted Long Service Levy receipt no. 7552630, dated 6 August 2024. The levy receipt is referenced under Construction Certificate CC1 – Item 5.		Compliant
3.	PART C		PRIOR TO COMMENCEMENT OF CONSTRUCTION			
3.1.	C	C1	Notification of Commencement 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.	Sighted notification letter to DPHI “WCC Bryson Building: Condition C1 & C2 – Project Commencement, Operation & Staging”, dated 1 November 2024. Sighted post approval receipt SSD-35715221-PA-17, dated 1 November 2024. Construction works commenced on 26 November 2024.		Compliant
3.2.	C	C2	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	Sighted notification Letter to DPHI “WCC Bryson Building: Condition C1 & C2 –		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			date of commencement and the development to be carried out in that stage.	Project Commencement, Operation & Staging", dated 1 November 2024. Sighted post approval receipt SSD-35715221-PA-17, dated 1 November 2024. Construction works commenced on 26 November 2024.		
3.3.	C	C3	Certified Drawings Prior to the commencement of any construction, the Applicant must submit to and obtain approval from the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.	30 August 2024 Structural Engineer Design Certificate from Birzulis. Structural Engineering Design Certificate and Associated Drawings prepared by Birzulis Associates Pty Ltd, dated 9 October 2024. This Certificate is referenced under Construction Certificate CC1 – Item 9. Structural Engineering Design Certificate and Associated Drawings prepared by Birzulis Associates Pty Ltd, dated 14 October 2024. This Certificate is referenced under Construction Certificate CC2 – Item 7. Submitted to Certifier on 21 November 2024. This certificate was approved under CC1 on 22 November 2024.		Compliant
3.4.	C	C4	Pre-Construction Dilapidation Report – Protection of Public Infrastructure Prior to the commencement of any construction, the Applicant must:	No consultation was required as WCC are the asset owner.		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>(a) consult with the relevant owner and provider of services and Infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;</p> <p>(b) prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non-residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected;</p> <p>(c) submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and</p> <p>(d) provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested.</p>	<p>Sighted Pre-Construction Dilapidation Report prepared by Opal Dilapidation, Rev 00, reference: OD3736, dated 28 August 2024.</p> <p>Sighted submission to Council via email, dated 3 September 2024.</p> <p>Sighted submission to Certifier as part of CC1 pack, dated 21 November 2024.</p> <p>Sighted submission to DPHI, dated 10 September 2024.</p> <p>Sighted post approval SSD-35715221-PA-4, dated 10 September 2024.</p>		
3.5.	C	C5	<p>Pre-Construction Survey – Adjoining Properties</p> <p>Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of residential/commercial buildings that are likely to be impacted by the development.</p>	Pre-Construction Survey for adjoining properties was not required as building is within the school premises.		Not Triggered
3.6.	C	C6	Where the offer for a pre-construction survey is accepted (as required by Schedule 3 condition <u>C5</u>), 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.	Pre-Construction Survey for adjoining properties was not required as the new building is within the school premises.		Not Triggered
3.7.	C	C7	Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by Schedule 3 condition C5, the Applicant must:	Sighted letter from Douglas Partners reference: R.002.Rev0, dated 2 September 2024, confirming that no impact is expected from vibration. The letter was submitted to		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<ul style="list-style-type: none"> (a) provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report; (b) submit a copy of the Pre-Construction Survey Report to the Certifier; and (c) provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested. 	the Certifier under the Construction Certificate CC1 pack.		
3.8.	C	C8	Community Communication Strategy No later than two weeks before the commencement of any 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.	Sighted Community Engagement Strategy revision final, dated 9 September 2024, under appendix D of CEMP. Sighted the submission of Community Engagement Strategy to DPHI, dated 9 September 2024. Sighted the post approval receipt SSD-35715221-PA-1, dated 9 September 2024.		Compliant
3.9.	C	C9	The Community Communication Strategy must: <ul style="list-style-type: none"> (a) identify people to be consulted during the design and construction phases; (b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; (c) provide for the formation of community-based forums, if required, that focus on key 	Community Engagement Strategy revision final dated 9 September 2024. <ul style="list-style-type: none"> (a) As per section 2 'Stakeholder Analysis'. (b) Procedures and mechanisms included in section 1.4 'Community Liaison'. 		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>environmental management issues for the development;</p> <p>(d) set out procedures and mechanisms:</p> <ul style="list-style-type: none"> i) through which the community can discuss or provide feedback to the Applicant; ii) through which the Applicant will respond to enquiries or feedback from the community; and iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation. <p>(e) include any specific requirements around traffic, noise and vibration, visual impacts, amenity, flora and fauna, soil and water, contamination, heritage.</p>	<p>(c) As per section 3 'Engagement tools and timeframes'.</p> <p>(d) Procedures and mechanisms included in section 1.4 'Community Liaison' and section 3.1 'Tools and timeframes'.</p> <p>(e) As per section 2 'Stakeholder Analysis'.</p>		
3.10.	C	C10	<p>Demolition</p> <p>Prior to the commencement of any relevant construction, demolition work plans required by <i>AS 2601-2001 The demolition of structures</i> (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier and Planning Secretary.</p>	<p>Demolition was completed under early works prior to SSD approval.</p> <p>No further demolition of structures is to occur. Only kerb, gutter and bitumen in future which will occur under the car parking stage, with intent to make good.</p>		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
3.11.	C	C11	Ecologically Sustainable Development Prior to the commencement of any relevant construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either: <ul style="list-style-type: none"> (a) registering for a minimum 5-star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifier; or (b) seeking approval from the Planning Secretary for an alternative certification process. 	The project intends to seek approval from the Department for an alternative certification process instead of Green Star certification. Sighted letter from DFP Planning “WCC – Bryson Building – Condition C11 – Ecologically Sustainable Development”, dated 13 December 2024. The town planner suggested to engage independent ESD practitioner.		Not Triggered
3.12.	C	C12	Outdoor Lighting Prior to the installation of outdoor lighting, evidence must be submitted to the Certifier that all outdoor lighting 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 and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	This condition is not yet triggered.		Not Triggered
3.13.	C	C13	Environmental Management Plan Requirements Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> (DPIE April 2020). <i>Note: The Environmental Management Plan Guideline is available on the Planning Portal at:</i> https://www.planningportal.nsw.gov.au/majorprojects/assessm	A Construction Environmental Management Plan has been developed dated 24 October 2024. As part of the project requirements, a Construction Noise and Vibration Management Plan, Erosion and Sediment Control, Community Engagement Strategy and Emergency Management Plan have also been developed. The CEMP has been	WCC-01_OFI-01: Several of the management plans developed by WSP did not include revision numbers, current details within the document control page, or sign off for	Compliant

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
		<p>ent/post-approval</p> <p>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	<p>prepared as per the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> (DPIE April 2020);</p> <ul style="list-style-type: none"> • Introduction as per section 1 of CEMP • Project Description as per section 1.1 of CEMP • Community and stakeholder engagement as per section 4.2 of CEMP 'Community Communication', and Stakeholder engagement addressed within Sub-Plans. • Relationship to an existing environmental management system as per section 1.6 of CEMP. • Environmental management structure and responsibilities as per section 4.5 of CEMP. • Legal and compliance requirements – as per WCC Building Spec accessible for team on Procure . • Training and awareness as per section 6.1 of CEMP. • Environmental Risk Assessment as per section 7 of CEMP. • Environmental Management Measures as per section 7 of CEMP • Environmental monitoring program as per section 4.7 of CEMP. 	<p>approval, with no document control or revision page included within the Flood Management Plan. Throughout the CEMP and sub-plans, there were also broken links and errors in bookmarks.</p> <p>It is understood that the first review of plans is upcoming as part of the 3-monthly cycle. It is therefore recommended to work with WSP in updating to the correct plan references and revisions for traceability purposes.</p> <p>Following the audit, the CEMP Revision 3, dated 6 February 2025, and Sub-Plans were provided with an updated document control page and the</p>	

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<ul style="list-style-type: none"> Environmental inspections as per section 4.7 of CEMP. Environmental control maps or plans as per section 7.8 & Appendix C of CEMP. Environmental management documents addressed throughout the CEMP & Sub-Plans. Compliance monitoring and reporting as per section 4.7 of CEMP. Environmental auditing as per section 4.9 & 8.4 of CEMP. Other environmental reporting addressed throughout the CEMP & Sub-Plans. Environmental incident and emergency planning, preparedness and response as per appendix E of CEMP. Corrective and preventative actions addressed throughout the CEMP & Sub-Plans. EMP review and revision process as per section 3.8 of CEMP Stakeholder Engagement as per Sub-Plans. Internal approval of EMP as per Section 8.3 of CEMP. 	<p>required signatures. Additionally, the broken links have been rectified. This OFI is now addressed and considered CLOSED.</p>	

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				<ul style="list-style-type: none"> Approval and Publication – The CEMP is approved and available on website. 		
3.14.	C	C14	<p>Construction Environmental Management Plan</p> <p>Prior to the commencement of any construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary. The CEMP must be generally consistent with the document Construction Management Plan dated 26 September 2022 prepared by Rohrig and include, but not be limited to, the following:</p> <p>(a) Details of:</p> <ul style="list-style-type: none"> (i) hours of work; (ii) 24-hour contact details of site manager; (iii) management of dust and odour to protect the amenity of the neighbourhood; (iv) groundwater management plan including measures to prevent groundwater contamination; (v) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting; (vi) community consultation and complaints handling as set out in the Community Communication Strategy required by 	<p>Construction Environmental Management Plan dated 24 October 2024.</p> <p>Sighted Draft CEMP email correspondence with WSP. Initial email sent out on 26 August 2024 with the CMP reference included.</p> <p>Sighted submission of CEMP to Certifier under CC1, dated 21 November 2024.</p> <p>Sighted submission of CEMP and Sub-Plans to DPHI SSD-35715221-PA-2, dated 10 September 2024.</p> <p>(a) Details:</p> <ul style="list-style-type: none"> (i) As per section 3.2.4 'Hours of Work' (ii) As per section 4.4 'Project Contacts'. (iii) Management measures addressed in section 7.9 'Dust and Odour'. (iv) Addressed in 7.14.3 'Groundwater' and appendix C 'Construction Soil and Water Management Plan' under of CEMP. (v) Addressed in section 7.1 'Outdoor Lighting' (vi) Addressed in section 4.8 'Complaints' and Community 		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>Schedule 3 condition C8;</p> <p>(vii) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and</p> <p>(viii) flood emergency procedures during construction works;</p> <p>(b) Construction Traffic and Pedestrian Management Sub-Plan (see Schedule 3 condition C16);</p> <p>(c) Construction Noise and Vibration Management Sub-Plan (see Schedule 3 condition C17);</p> <p>(d) Construction Soil and Water Management Sub-Plan (see Schedule 3 condition C18);</p> <p>(e) an unexpected finds protocol for contamination and associated communications procedure;</p> <p>(f) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and</p> <p>(g) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site.</p>	<p>Engagement Strategy under appendix D</p> <p>(vii) Details included in section 7.12 'Waste management'</p> <p>(viii) Flood emergency procedure included in section 1.4 'Specific Emergency Response Requirements and Scenarios' of Emergency Management Plan under appendix E.</p> <p>(b) Construction Traffic and Pedestrian Management Sub-Plan Issue 0, dated 7 September 2024, under Appendix B of CEMP.</p> <p>(c) Construction Noise and Vibration Management Revision 0, dated 29 August 2024, under appendix A of CEMP</p> <p>(d) Construction Soil and Water Management Plan Revision 0, dated 15 October 2024, under appendix C of CEMP.</p> <p>(e) Addressed in section 8.2.4 'Unexpected Finds-Contamination'.</p> <p>(f) Addressed in section 8.2 'Unexpected Finds'.</p> <p>(g) As per section 7.14 'Contamination'</p>		
3.15.	C	C15	The Applicant must not commence construction of the development until the CEMP is approved by the Certifier and a copy submitted to the Planning Secretary.	Sighted submission of CEMP and Sub-Plans to DPHI SSD-35715221-PA-2, dated 10 September 2024.		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				CEMP was approved by Certifier under Construction Certificate CC1 on 22 November 2024. Sighted submission of CEMP and Sub-Plans to DPHI SSD-35715221-PA-2, dated 10 September 2024.		
3.16.	C	C16	<p>The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:</p> <p>(f) be prepared by a suitably qualified and experienced person(s);</p> <p>(g) be consistent with the Section 9 - Construction Pedestrian and Traffic Management Plan Methodology (Stage 1) in the Traffic Impact Assessment prepared by Ptc dated 27 June 2023;</p> <p>(h) be prepared in consultation with Council and TfNSW;</p> <p>(i) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; and</p> <p>(j) detail heavy vehicle routes, access and parking arrangements.</p>	<p>Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) Issue 0, dated 7 September 2024, under Appendix B of CEMP.</p> <p>(a) CTPMSP prepared by WSP. (b) As per section 1.5 'Reference Documents' of CTPMSP. (c) As per section 1.3.3 'The Hills Shire Council Advice' and section 5.4 'Stakeholder Consultation' of CTPMSP. (d) As per section 5 'Mitigation measures' of CTPMSP. (e) As per section 3.4.2 'Construction Vehicles Route and Site Access' of CTPMSP.</p>	<p>WCC-01_OFI-02:</p> <p>Although a stand-alone document to address Condition C19 has been developed, the Driver Code of Conduct is not appended to the CTPMSP.</p> <p>Given their interrelation, it is recommended to include the Driver Code of Conduct as part of the CTPMSP and consolidate these documents for ease of reference.</p> <p>Additionally: as linked to WCC-01_OFI-01</p>	Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
					<p>included under Condition C13: The CTPMSP was issued on 7 September 2024; however, it includes the consultation letter from TfNSW dated 16 October 2024. Upon review of the CTPMSP, TfNSW comments appeared to be adequately addressed. As per WCC-01_OFI-01, it is recommended when reviewing and updating the plans, to include the current revision and date as well as the signature for the plan's approval.</p> <p>Following the audit, CTPMSP Revision 1, dated 6 February 2025 was provided with the updated</p>	

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
					document control page. The Driver Code of Conduct has been included as per section 5.5 "Driver Code of Conduct". However, the page numbering is not aligned with the rest of the document. It is recommended that the page numbers be updated during the upcoming plan review, however for the purpose of the audit, this finding has now been addressed and considered CLOSED .	
3.17.	C	C17	<p>The Construction Noise and Vibration Management Sub-Plan (CNVMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced noise expert; (b) be consistent with recommendations in Stage 1 Works Noise and Vibration Impact Assessments dated 20 March 2023 and prepared by SLR Consulting Australia Pty Ltd; (c) describe procedures for achieving the noise management levels in EPA's <i>Interim Construction Noise Guideline</i> (DECC, 2009); 	<p>Construction Noise and Vibration Management Plan (CNVMP) Revision 0, dated 29 August 2024, under Appendix A of CEMP</p> <ul style="list-style-type: none"> (a) CNVMP prepared by WSP. (b) Addressed in section 1.3 'Purpose of this Plan' of CNVMP. (c) As per section 3.2 'Construction Noise' of CNVMP. (d) As per section 5.3 'Management Measures' of CNVMP. (e) As per section 5.3 'Management Measures' of CNVMP. 		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<div><div>(d)</div><div>describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</div></div> <div><div>(e)</div><div>include strategies that have been developed with the community for managing high noise generating works;</div></div> <div><div>(f)</div><div>describe the community consultation undertaken to develop the strategies in Schedule 3 condition <u>C17(e)</u>;</div></div> <div><div>(g)</div><div>include a complaints management system that would be implemented for the duration of the construction; and</div></div> <div><div>(h)</div><div>include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the management measures in accordance with Schedule 3 condition <u>C13</u>.</div></div>	<div><div>(f)</div><div>As per section 5.3 'Management Measures' of CNVMP.</div></div> <div><div>(g)</div><div>As per section 6.3 'Complaints Management' of CNVMP.</div></div> <div><div>(h)</div><div>As per section 6 'Compliance Management' of CNVMP.</div></div>		
3.18.	C	C18	<div>The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following:</div> <div><div>(a)</div><div>be prepared by a suitably qualified expert, in consultation with Council;</div></div> <div><div>(b)</div><div>describe all erosion and sediment controls to be implemented during construction, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book';</div></div>	<div>Construction Soil and Water Management Plan (CSWMP) Revision 0, dated 15 October 2024, under appendix C of CEMP.</div> <div><div>(a)</div><div>CSWMP prepared by Stuart Longman (CPESC#6805). Sighted consultation correspondence with Council with the initial email sent out on 29 August 2024. Sighted the engineering documentation endorsement letter from the Council, dated 21 November 2024, with an endorsement date of 20 November 2024.</div></div>	<div>WCC-01_OFI-03:</div> <div>The current version of the CSWMSP is in draft and word format. It is recommended that when undertaking a review of the management plans as per Condition C13, that the CSWMSP is finalised as a pdf version.</div>	Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<ul style="list-style-type: none"> (c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the site); (d) detail all off-site flows from the site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to, 1 in 5-year ARI and 1 in 100-year ARI). 	<ul style="list-style-type: none"> (b) Addressed in section 2.5 'Erosion Control' and section 2.6 'Sediment Controls' of this CSWMP. (c) As per section 8.2.5 "Wet Weather" of the CEMP. (d) As per section 8.2.6 'Flood Management' of CEMP (e) As per section 8.2.6 'Flood Management' of CEMP 	Following the audit CSWPM Revision 1, dated 6 February 2025, was provided in pdf format as a finalised version with the required signature. This OFI is now addressed and considered CLOSED .	
3.19.	C	C19	<p>Prior to the commencement of any construction a Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following:</p> <ul style="list-style-type: none"> (a) minimise the impacts of earthworks and construction on the local and regional road network; (b) minimise conflicts with other road users; (c) minimise road traffic noise; and (d) ensure truck drivers use specified routes. 	<p>CTPMSP section 3.4.4 'Driver Code of Conduct' states that "Prior to the commencement of construction, a Driver Code of Conduct is to be prepared and communicated to heavy vehicle drivers as part of induction. This must be adhered to in order to minimise impacts of construction on the local and regional road network by managing access routes and driver behaviour".</p> <p>Sighted Rohrig's Driver Code of Conduct which includes the following:</p> <ul style="list-style-type: none"> (a) All loads shall be covered with tarps and be secured. Drawbars, tailgates and side combing are to be cleaned of all materials. (b) All drivers must obey all signs, directions and instructions and 		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				<p>display respect and courtesy for other road users.</p> <p>(c) Using engine brakes can be extremely noisy. If possible, you should not use engine brakes near residences and built-up areas.</p> <p>(d) In terms of broader road network, the site is accessible from the east via M2 Motorway, west via M7 Motorway and north and south via Old Windsor Road. Vehicles travelling from all directions shall arrive at Northwest Boulevard, turn left into Windsor Road, turn right into Showground Road, turn left into Green Road and then turn right into Wrights Road.</p> <p>Communicated as part of the subcontractor onboarding.</p>		
3.20.	C	C20	<p>Unexpected Contamination Procedure</p> <p>Prior to the commencement of any construction, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. Where any material identified as contaminated is to be disposed off-site, the disposal location and results of testing submitted to the Planning Secretary prior to its removal from the site.</p>	<p>Unexpected find procedure has been prepared and included in section 8.2 “Unexpected Finds Protocols” of CEMP</p>		Compliant

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
3.21.	C C21	Construction Parking Prior to the commencement of any construction, the Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.	Section 5.1.6 'Site Vehicles' of CEMP states that "All construction vehicles will be contained wholly within the work site and defined parking areas. There must be sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities". The site parking currently accommodates 238 parking spaces as per section 2.7 'Parking' of CTPMSP.		Compliant
3.22.	C C22	Site Contamination Prior to the commencement of any 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.	Sighted letter dated 2 September 2024 confirming that Ian Swane from IAN SWANE and Associates engaged as Site Auditor. The credentials of site auditor is CPEng, CEenvP & CSCS. Ian Swane is also EPA accredited site auditor.		Compliant
3.23.	C C23	Prior to the commencement of any construction (including demolition works), the Applicant must (a) undertake works recommended in the Preliminary Site Investigation Concept Plan and Stage 1 prepared by Eiaustralia dated 29 May 2023, including, but not limited to: (i) a hazardous material survey, completed by a suitably qualified consultant, to confirm the presence / location of any	No existing buildings fabrics therefore this condition is not yet triggered. 2022 JK Environmental survey issued to Certifier as part of Construction Certificate CC1.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			hazardous materials within the existing building fabrics; and (b) provide a copy of the report to the Certifier, for information.			
3.24.	C	C24	Flood Management Prior to the commencement of any construction, the Applicant must prepare and implement for the duration of construction: <ul style="list-style-type: none"> (a) flood warning and notification procedures for construction workers on site; and (b) evacuation and refuge protocols. 	Construction Flood Emergency Management Plan (CFEMP) included under appendix E “Emergency Management Plan.” <ul style="list-style-type: none"> (a) As per section 4.0 “Flood Warnings and Notifications” of CFEMP (b) As per section 6.0 “Assembly Point and Evacuation Routes” of CFEMP. 	As per above improvement opportunity WCC-01_OFI-01 (C13): it is recommended including a Document Control Page as part of the Flood Emergency management Plan. Following the audit, CFEMP Revision 1, dated 6 February 2025, was provided with the required document control page and signoff. This OFI is now addressed and considered CLOSED .	Compliant
4.	PART D – DURING CONSTRUCTION					
4.1.	D	D1	Site Notice A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purposes of	Site notice displayed as noted during site inspection: <ul style="list-style-type: none"> (a) appeared suitably size (b) appeared durable and waterproof 	WCC-01_NC-01: The Site Notice displayed at the time of the audit did not	Non-Compliant (CLOSED)

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
		<p>informing the public of project details and must satisfy the following requirements:</p> <ul style="list-style-type: none"> (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; 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. 	<p>(c) Certifier and Structural Engineer not included</p> <p>(d) Site notice mounted at eye level. No "authorised entry" noted.</p>	<p>include the name of the Certifier or Structural Engineer and was therefore deemed non-compliant with the requirements of Condition D1(c).</p> <p>It is understood that an updated sign is expected to soon arrive with the full details.</p> <p>Close out of this non-compliance will be based on the evidence provided showing the updated sign installed with details to address Condition D1 in full.</p> <p>Following the audit, photo evidence of the new site notice was provided, now displaying the contact details of the Certifier and structural engineer as required</p>	

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
					by Condition D1. Refer to Photos under Appendix G. This non-compliance is now addressed and considered CLOSED .	
4.2.	D	D2	Operation of Plant and Equipment 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.	Hammertech system is used for maintaining records of plant and equipment maintenance. Equipment register sighted on the Hammertech dashboard. Sighted maintenance details OF Hitachi Excavator, plant no. D00031063 with unique id 003. The excavator was inducted on-site on 21 November 2024 and was last serviced on 6 May 2024. Sighted Plant risk assessment for Excavator dated 8 July 2019. Sighted Inspection Report 745423 for excavator, dated 6 May 2024. Sighted details of Tower Crane, plant no. PITCR8012021/23 with serial no. 14095. The tower crane was inducted on-site on 5 December 2024. The last service was completed on 10 January 2025. Sighted Plant Risk Assessment for Tower Crane dated 19 September 2024.		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				Sighted Pre-Installation Checklist, dated 10 January 2025. The tower crane was erected on 13 January 2025. Sighted Advance Service checklist, dated 15 January 2025.		
4.3.	D	D3	Demolition Demolition work must comply with the demolition work plans required by <i>Australian Standard AS 2601-2001 The demolition of structures</i> (Standards Australia, 2001) and endorsed by a suitably qualified person as required by Schedule 3 condition <u>C10</u> .	The demolition of the existing structure has been completed prior to construction of this project.		Not Triggered
4.4.	D	D4	Upon completion of the demolition works of the car park (including removal of the surface), the Applicant must submit to the Certifier, for information; <ul style="list-style-type: none"> (a) an asbestos clearance inspection and certificate, prepared and signed by a suitability qualified professional (SafeWork NSW Licensed Asbestos Assessor) (if asbestos is found); and (b) a statement confirming that a suitably qualified consultant has conducted inspection of the exposed surfaces. 	Completion of demolition works will fall under the final occupation certificate. This is not yet triggered.		Not Triggered
4.5.	D	D5	Construction Hours Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:	Construction hours are mentioned in CEMP section 3.2.4 'Hours of Work' and displayed on site notice. No out of hours work occurred to date.		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>(a) between 7am and 6pm, Mondays to Fridays inclusive; and</p> <p>(b) between 8am and 1pm, Saturdays.</p> <p>No work may be carried out on Sundays or public holidays.</p>			
4.6.	D	D6	<p>Construction activities may be undertaken outside of the hours in Schedule 3 condition <u>D5</u> if required:</p> <p>(a) by the Police or a public authority for the delivery of vehicles, plant or materials; or</p> <p>(b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or</p> <p>(c) where the works are inaudible at the nearest sensitive receivers; or</p> <p>(d) where a variation is approved in advance in writing by the Planning Secretary or his nominee if appropriate justification is provided for the works.</p>	No out of hours work occurred to date.		Not Triggered
4.7.	D	D7	Notification of such construction activities as referenced in Schedule 3 condition <u>D6</u> must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	No out of hours work occurred to date.		Not Triggered
4.8.	D	D8	<p>Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:</p> <p>(a) 9am to 12pm, Monday to Friday;</p> <p>(b) 2pm to 5pm Monday to Friday; and</p>	No rock breaking, rock hammering or similar activities carried out to date.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			(c) 9am to 12pm, Saturday.			
4.9.	D	D9	Implementation of Management Plans The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	<u>Environmental Inspections:</u> Sighted weekly safety and environmental inspection ISP-5710, dated 3 February 2025. No observation was raised. Checklist includes questions related to topics such as waste management, Environment, emergency procedures, first aid, PPE, Environmental Issues, Plant and Equipment. Sighted weekly safety and environmental inspection ISP-4324, dated 20 January 2025. OBS-661 waste and skip bins were overfilled was raised. The observation was closed on 20 January 2025. Sighted Task Observation inspection ISP-2938 for hydraulic trenching, dated 16 December 2024. Sighted Emergency Drill Response MEET-11353 for Plant and Vehicle crash, dated 16 January 2025. Signoff sheet was included. Sighted Crane install toolbox talk MEET-10864, dated 13 January 2025. Sighted Toolbox Talk MEET-9208 for Heat Exhaustion, dated 17 December 2025.	WCC-01_OFI-04: The complaints register, as developed in accordance with the Community Engagement Strategy and available on the project website, included details of the complaint received 28-Nov-24 and actions to be taken to address the complaint. However, there was no date to demonstrate when the complaint was addressed and closed. It is recommended to update the register to include the close out date (5-Dec-24) to demonstrate that actions have been undertaken in a timely	Compliant

13 ID No	SSD Part & Req. No.	SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p><u>Dust Management:</u></p> <p>Dust and emission mitigation measures are communicated to workers through project induction. Dust management is regularly monitored during weekly safety and environmental inspections. No dust-generating activities were observed during the site inspection. Water points were available throughout the site for dust suppression as needed, and a sprinkler system was installed along the driveway.</p> <p><u>Noise Management:</u></p> <p>SiteHive is used for real-time monitoring; however, as the project has only recently commenced, data is still being collected. Standard construction hours are currently being adhered to, and no Out-of-Hours Work has been required to date. No noise complaints have been received to date.</p> <p><u>Traffic Control:</u></p> <p>A complaint was received via phone call regarding construction vehicle movements during school pick-up times. The action required Rohrig to notify all workers and subcontractors that construction vehicle movements are not permitted during peak school drop-off and pick-up times, which are from 8:00 AM to 8:40 AM and 2:45 PM to</p>	<p>manner. It is also recommended to ensure any future complaints include this detail.</p> <p>Following the audit, the updated Complaints Register was provided which now includes a column for the date closed. This OFI is now addressed and considered CLOSED.</p>	

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
				<p>3:45 PM, respectively. Rohrig had to address the issue of construction vehicle movements during toolbox talks. The complaint has been resolved and closed.</p> <p>Sighted Pre-Start MEET-7691, dated 5 December 2024, advising that cars must obey traffic rules outside the school property and exercise caution when traveling down Morris Grove.</p> <p>Sighted email to concreters, dated 5 December 2024, instructing them to distribute information regarding school hours and complaints to all drivers.</p> <p><u>Stockpile Management:</u></p> <p>The stockpile area is located at a distance from the main construction site. Topsoil is separated from the fill material and retained for future use. An irrigation sprinkler system is in place for dust suppression and soil stabilisation. A sediment fence has been installed around the stockpile area.</p>		
4.10.	D	D10	<p>Construction Traffic</p> <p>All construction vehicles are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site or an approved on-street work zone before stopping.</p>	<p>All construction vehicles are contained within the site. No permits or work zones have been required.</p>		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
4.11.	D	D11	Hoarding Requirements The following hoarding requirements must be complied with: <ul style="list-style-type: none"> (a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; 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 hoarding installed, ATF fencing in place around construction areas; no advertising or graffiti noted during inspection.		Not Triggered
4.12.	D	D12	No Obstruction of Public Way 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.	No obstruction of public way noted during site inspection.		Compliant
4.13.	D	D13	Construction Noise Limits 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 CNVMSP required by Schedule 3 condition <u>C17</u> .	SiteHive is used for real time monitoring; however, as the project has only recently commenced, the data is still being collected. The noise monitoring report will be provided in a month. The exceedances can be notified via messages.		Compliant
4.14.	D	D14	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	Implemented as per project induction and Management Plans. Currently as per standard working hours.		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			outlined under Schedule 3 condition <u>D5</u> unless approved by Schedule 3 condition <u>D6</u> .			
4.15.	D	D15	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.	Vehicles mostly fitted with squawkers, as noted during the site inspection.	Note: one sub-contractor vehicle was noted to have a beeper; Rohrig to implement quackers were practicable in future.	Compliant
4.16.	D	D16	Vibration Criteria Vibration caused by construction at any residence or structure outside the site must be limited to: <ul style="list-style-type: none"> (a) for structural damage, the latest version of <i>DIN 4150-3 (1992-02) Structural vibration -Effects of vibration on structures</i> (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the <i>Environmental Noise Management Assessing Vibration: a technical guideline</i> (DEC, 2006) (as may be updated or replaced from time to time). 	Sighted letter from Douglas Partners reference: R.002.Rev0, dated 2 September 2024, confirming that no impact is expected from vibration. The letter was submitted to the Certifier under CC1 pack.		Compliant
4.17.	D	D17	Vibratory compactors must not be used closer than 30m from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in Schedule 3 condition <u>D16</u> .	Sighted letter from Douglas Partners reference: R.002.Rev0, dated 2 September 2024, confirming that no impact is expected from vibration. The letter was submitted to the Certifier under CC1 pack.		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
4.18.	D	D18	The limits in Schedule 3 condition <u>D16</u> and Schedule 3 condition <u>D17</u> apply unless otherwise outlined in a CNVMSP required by Schedule 3 condition <u>C17</u> .	Limits apply as per condition of consent.		Compliant
4.19.	D	D19	Tree Protection For the duration of the construction works: <ul style="list-style-type: none"> (a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; (b) all street trees immediately adjacent to the approved disturbance area / property boundaries must be protected at all times during construction in accordance with Council's tree protection requirements. Any street tree, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council; (c) all trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the Arboricultural Impact Assessment Report – Stage 1 prepared by Arterra dated 15 July 2022, as amended by the Tree Protection and Removal Plan – Stg 1, Drawing No. T-04, Rev C, dated 21 August 2024; and 	Tree protection compliance verified as follows: <ul style="list-style-type: none"> • No access is required to the tree protection zone. • A fence has been installed for tree protection. • No building materials were observed leaning against the tree protection fence. • No digging has been carried out near the tree protection zone. • The stockpile area is located a bit further from the construction site. Sighted letter "Periodic inspections during construction – tree protection certification" from Project Arborist, Arterra, dated 13 September 2024.		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			(d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.			
4.20.	D	D20	Air Quality The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	No dust-generating activities were observed during the site inspection. Water points were available throughout the site for dust suppression as needed, and a sprinkler system was installed along the driveway.		Compliant
4.21.	D	D21	During construction, the Applicant must ensure that: <ul style="list-style-type: none"> (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; 	<ul style="list-style-type: none"> (a) No dust observed during the site inspection. (b) Truck loads are to be covered before leaving the site (c) No mud tracking on roads; rumble grid and sprinkler system in place. (d) Roads were kept clean (e) Access driveway was stabilised 		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>(d) public roads used by these trucks are kept clean; and</p> <p>(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</p>			
4.22.	D	D22	<p>Erosion and Sediment Control</p> <p>All erosion and sediment control measures must be effectively implemented and maintained in accordance with the CSWMSP required by Schedule 3 condition <u>C18</u>.</p>	<p>Controls as noted during the site inspection. Consistent with the ERSER controls map. Sediment fences installed with sandbags and coir logs at low point areas.</p>		Compliant
4.23.	D	D23	<p>Imported Fill</p> <p>The Applicant must:</p> <p>(a) all soil materials designed for off-site disposal as part of the development, including any virgin excavated natural material, are pre-classified in accordance with EPA Waste Classification Guidelines (2014);</p> <p>(b) 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;</p> <p>(c) keep accurate records of the volume and type of fill to be used; and</p> <p>(d) make these records available to the Certifier upon request.</p>	<p>DGB20 for pathway imported.</p> <p>Sighted ASCT DGB20 validation report 6-1449-3051 Suite, dated 13 January 2025.</p> <p>Sighted Certificate of Analysis 369175 prepared by Envirolab Services, dated 18 December 2024.</p> <p>Certifier has not requested any records.</p>		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
4.24.	D	D24	Disposal of Seepage and Stormwater Adequate provisions must be made to collect and discharge stormwater drainage during construction of the building 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.	Seepage and stormwater disposal not required. The stormwater is collected at the WCC dam.		Not Triggered
4.25.	D	D25	Emergency Management 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	Emergency Management Plan version 1 dated 28 August 2024. Sighted Emergency Drill Response MEET-11353 for Plant and Vehicle crash, dated 16 January 2025. Signoff sheet was included.		Compliant
4.26.	D	D26	Unexpected Finds Protocol – Aboriginal Heritage In the event that surface disturbance identifies a new Aboriginal object: <ul style="list-style-type: none"> (a) all works must halt in the immediate area to prevent any further impacts to the object(s); (b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects; (c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and 	There have been no unexpected Aboriginal finds to date.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>the management outcome for the site included in the information provided to AHIMS;</p> <p>(d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and</p> <p>(e) works may only recommence with the written approval of the Planning Secretary.</p>			
4.27.	D	D27	<p>Unexpected Finds Protocol – Historic Heritage</p> <p>If any unexpected archaeological relics are uncovered during the work, then:</p> <p>(a) all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary;</p> <p>(b) depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW; and</p> <p>(c) works may only recommence with the written approval of the Planning Secretary.</p>	There have been no unexpected relic or artefact finds to date.		Not Triggered
4.28.	D	D28	<p>Unexpected Finds Protocol – Burials</p> <p>In the event that a burial or skeletal remains are uncovered during work, then:</p>	There have been no unexpected burial or skeletal remains finds to date.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			<p>(a) all works must cease immediately in that area and the NSW Police and Heritage NSW contacted;</p> <p>(b) a suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains;</p> <p>(c) the Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the skeletal remains; and</p> <p>(d) works may only recommence with the written approval of Heritage NSW.</p>			
4.29.	D	D29	<p>Waste Storage and Processing</p> <p>All waste generated during construction must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighboring public or private properties.</p>	<p>Purple Cow waste bins placed in various locations throughout the site as observed during site inspection.</p> <p>Purple Cow collects waste on weekly basis or as required.</p>		Compliant
4.30.	D	D30	<p>All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).</p>	<p>Purple Cow waste management report for the period from 26 November 2024 to 31 January 2025, indicating a total recyclable waste rate of 10.86 tonnes.</p>		Compliant
4.31.	D	D31	<p>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.</p>	<p>A concrete tray was used for concrete waste during concrete pour, which was then bagged and removed from the site.</p>		Compliant
4.32.	D	D32	<p>The Applicant must record the quantities of each waste type generated during construction and the proposed reuse,</p>	<p>Sighted Waste Management Report prepared by Purple Cow Industries for the</p>		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			recycling and disposal locations for the duration of construction.	period from 26 November 2024 to 31 January 2025. A total of 11.66 tonnes of waste was generated, of which 10.86 tonnes were recycled. Sighted Waste Diversion Report prepared by Purple Cow Industries for the period from 26 November 2024 to 31 January 2025. The quantities of each waste type generated included in the report such as 2.51 tonnes of timer waste and 4.13 tonnes of concrete waste was generated.		
4.33.	D	D33	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.	Sighted Asbestos in Soil Clearance Inspection Report prepared by Trinitas Group (LAA001132), dated 4 February 2025, confirming that no visible asbestos identified in the area.		Not Triggered
4.34.	D	D34	Outdoor Lighting The Applicant must ensure that all external lighting is constructed and maintained in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	This condition is not yet triggered.		Not Triggered
4.35.	D	D35	Independent Environmental Audit Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	This is the first independent environmental audit of the development which is being carried out within 12 weeks of commencement of construction (26 November 2024) as per the IAPAR 2020.		Compliant
4.36.	D	D36	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an	Sighted DPHI approval letter "Concept and Stage 1 William Clarke College (SSD-		Compliant

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			Independent Audit Program or commencement of an Independent Audit.	35715221) – Construction Auditor Approval Request”, dated 5 November 2024 for The APP Group.		
4.37.	D	D37	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 (2020), upon giving at least 4 weeks’ notice (or timing) to the applicant of the date or timing upon which the audit must be commenced.	No changes in audit times have been requested to date.		Not Triggered
4.38.	D	D38	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: <ul style="list-style-type: none"> (a) review and respond to each Independent Audit Report prepared under Schedule 3 condition <u>D35</u> of this consent; (b) submit the response to the Planning Secretary and the Certifier; and (c) make each Independent Audit Report and response to it publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary. 	This is the first independent environmental audit of the development.		Not Triggered
4.39.	D	D39	Independent Audit Reports and the Applicant’s response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval	This is the first independent environmental audit of the development.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			Requirements (2020), unless otherwise agreed by the Planning Secretary.			
4.40.	D	D40	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020), 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.	Operational audits are not yet triggered.		Not Triggered
5.	APPENDIX 1 – ADVISORY NOTES					
5.1.	AN	AN1	General All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	No licenses, permits, approvals and consents required to date.		Not Triggered
5.2.	AN	AN2	Long Service Levy For work costing \$25,000 or more, a Long Service Levy must be paid. For further information please contact the Long Service Payments Corporation Helpline on 131 441.	Sighted Long Service Levy receipt no. 7541562, dated 18 July 2024. Sighted Long Service Levy receipt no. 7552630, dated 6 August 2024. The levy receipt is referenced under CC1 – Item 5.		Compliant
5.3.	AN	AN3	Legal Notices Any advice or notice to the consent authority must be served on the Planning Secretary.	No legal notices have been issued.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
5.4.	AN	AN4	Access for People with Disabilities The works that are the subject of this application must be designed and constructed to provide access and facilities for people with a disability in accordance with the BCA. Prior to the commencement of construction, the Certifier must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.	Sighted Construction Access Report reference: 22103 – issue B, dated 11 December 2024. This report falls under CC3. Design to be updated and finalised.		Not Triggered
5.5.	AN	AN5	Utilities and Services Prior to the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Sighted Building Plan Assessment approval from Sydney Water, Tap in reference: 1952271, dated 30 August 2024. The approval is valid for one year. Sighted Dial before you dig in (DBYD), job no. 37459211, dated 28 August 2024, with start date 15 September 2024 and end date 30 January 2026. The notification was also sent to the following asset owners; <ul style="list-style-type: none"> • Endeavour Energy • Jemena Gas North • NBN Co NswAct • Optus and or Uecomm NSW • Sydney Water • Telstra NSW Central • The Hills Shire Council 		Compliant
5.6.	AN	AN6	Prior to the commencement of above ground works written advice must be obtained from the electricity supply authority, an approved telecommunications carrier and an approved gas	This condition is not yet triggered.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			carrier (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.			
5.7.	AN	AN7	Road Design and Traffic Facilities All roads and traffic facilities must be designed to meet the requirements of Council or TfNSW(RMS) (whichever is applicable). The necessary permits and approvals from the relevant road authority must be obtained prior to the commencement of road or pavement construction works.	No permits from Council or TfNSW were required to date.		Not Triggered
5.8.	AN	AN8	Road Occupancy Licence A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	No Road Occupancy License required to date.		Not Triggered
5.9.	AN	AN9	SafeWork Requirements To protect the safety of work personnel and the public, the work site must be adequately secured to prevent access by unauthorised personnel, and work must be conducted at all times in accordance with relevant SafeWork requirements.	Safety included as part of the site induction. Safety signage noted on site. Personnel observed to be adequately wearing PPE. Secured fencing surrounding site areas with restricted access.		Compliant
5.10.	AN	AN10	Hoarding Requirements The Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reserve.	No hoarding required. ATF fencing installed in the perimeter of the worksite. Refer to photos.		Not Triggered
5.11.	AN	AN11	Handling of Asbestos The Applicant must consult with SafeWork NSW concerning the handling of any asbestos waste that may be encountered during construction. The requirements of the Protection of the	No asbestos finds to date.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 – ‘Transportation and management of asbestos waste’ must also be complied with.			
5.12.	AN	AN12	Speed limit authorisation At least eight weeks prior to the commencement of operation, the Applicant must submit the following details to TfNSW and obtain authorisation to install School Zone signs and associated pavement markings, and / or removal / relocation of any existing Speed Limit signs: <ul style="list-style-type: none"> (a) a copy of the conditions of consent; (b) the proposed school commencement/opening date; (c) two sets of detailed design plans showing the following: <ul style="list-style-type: none"> (i) accurate Site boundaries; (ii) details of all road reserves, adjacent to the Site boundaries; (iii) all proposed access points from the Site to the public road network and any additional conditions imposed/proposed on their use; (iv) all existing and proposed pedestrian crossing facilities on the adjacent road network; (v) all existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings); and (vi) all existing and proposed street furniture and 	This condition is not yet triggered.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			street trees.			
5.13.	AN	AN13	Fire Safety Certificate The owner must submit to Council an Annual Fire Safety Statement, each 12 months after the final Safety Certificate is issued. The certificate must be on, or to the effect of, Council's Fire Safety Statement.	Fire Safety Certificate will be issued upon completion of works.		Not Triggered
6.	APPENDIX 2 – WRITTEN INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS					
6.1.	IN	1.	Written Incident Notification Requirements A written incident notification addressing the requirements set out below must be emailed to the Planning Secretary through the major projects portal within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition A24 or, having given such notification, subsequently forms the view that an incident has not occurred.	No incidents to date.		Not Triggered
6.2.	IN	2.	Written notification of an incident must: <ul style="list-style-type: none"> (a) identify the development and application number; (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); (c) identify how the incident was detected; (d) identify when the applicant became aware of the incident; (e) identify any actual or potential non-compliance with conditions of consent; (f) describe what immediate steps were taken in relation to the incident; 	No incidents to date.		Not Triggered

13 ID No	SSD Part & Req. No.		SSD Requirement	Audit Evidence	Audit Findings/ Recommendations	Compliance rating
			(g) identify further action(s) that will be taken in relation to the incident; and (h) identify a project contact for further communication regarding the incident.			
6.3.	IN	3.	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	No incidents to date.		Not Triggered
6.4.	IN	4.	The Incident Report must include: <ul style="list-style-type: none"> (a) a summary of the incident; (b) outcomes of an incident investigation, including identification of the cause of the incident; (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) details of any communication with other stakeholders regarding the incident. 	No incidents to date.		Not Triggered

Appendix F – Consultation

Consultation with DPHI

From: Brigitte Healey <brigitte.healey@dpie.nsw.gov.au>
Sent: Wednesday, 29 January 2025 9:59 AM
To: Sanan Qasim
Cc: Barbara Pater
Subject: RE: Independent Environmental Audit - William Clarke College (SSD-35715221)

EXTERNAL

Hi Sanan

Thank you for the opportunity to provide input into the Independent Environmental Audit (IEA) for the Concept and Stage 1 application for redevelopment of William Clarke College (SSD-35715221).

The NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) has no further comments in relation to the scope beyond ensuring that the IEA complies with state significant development consent SSD-35715221 and the Independent Audit Post Approval Requirements (2020).

NSW Planning requests that you consult with the local council.

If you would like to discuss this further, I can be contacted on the details below.

Kind regards

Brigitte Healey *she/her*
Compliance Officer
Metro
Department of Planning, Housing and Infrastructure

T 02 8229 2936 E brigitte.healey@dpie.nsw.gov.au

dphi.nsw.gov.au

Locked Bag 5022 PARRAMATTA NSW 2124

Working days Monday to Friday, 09:00am - 05:00pm



I acknowledge 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 consider the environment before printing this email.

From: Sanan Qasim <Sanan.Qasim@app.com.au>
Sent: Friday, January 24, 2025 2:33 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc: Barbara Pater <Barbara.Pater@app.com.au>
Subject: Independent Environmental Audit - William Clarke College (SSD-35715221)

Dear Sir/Madam,

I am writing to advise that The APP Group – HSEQ Systems and Auditing (APP) will be conducting the Independent Environmental Audit of the William Clarke College project as a requirement of Consent Conditions SSD-35715221.

The audit will be conducted on the 6 February 2025 and will review compliance in accordance with SSD-35715221 Schedule 3: Parts A, B, C, D and appendices, as applicable.

In line with the consultation requirements of the *Independent Audit Post Approval Requirements* (IAPAR 2020), Section 3.2, APP seeks your input into the scope of the audit and advice on any particular areas where you would like us to focus on.

Please also advise if you wish for any stakeholders to be contacted to obtain their input into the scope of this audit.

Regards,

Sanan Qasim
Environmental Consultant – HSEQ Systems and Auditing



The APP Group

A Bursall Venns Company

0423 736 753 | sanan.qasim@app.com.au
Gadigal Country | Level 14, 10 Spring Street, Sydney NSW 2000

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Consultation with Council

From: Jane Willmott <jwillmott@thehills.nsw.gov.au>
Sent: Monday, 3 February 2025 9:14 AM
To: Sanan Qasim
Subject: 1320/2024 SSDAS Independent Environmental Audit - William Clarke College (SSD-35715221)

EXTERNAL

Good morning Sanan

Thank you for your email.

The manager of Subdivision has suggested a focus on dust, noise, traffic control and stockpile management.

Regards

Jane



Jane Willmott

Certification Business Support

+61298430301 | jwillmott@thehills.nsw.gov.au

Administration Centre, 3 Columbia Court Norwest NSW 2153

PO Box 7064, NORWEST NSW 2153

www.thehills.nsw.gov.au

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From: Sanan Qasim <Sanan.Qasim@app.com.au>
Sent: Thursday, 30 January 2025 11:18 AM
To: The Hills Shire Council <Council@thehills.nsw.gov.au>
Cc: Barbara Pater <Barbara.Pater@app.com.au>
Subject: (ECM:21775752) Independent Environmental Audit - William Clarke College (SSD-35715221)

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Dear Sir/Madam,

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The audit will be conducted on the 6 February 2025 and will review compliance in accordance with SSD-35715221 Schedule 3: Parts A, B, C, D and appendices, as applicable.

In line with the consultation requirements of the *Independent Audit Post Approval Requirements* (IAPAR 2020) Section 3.2 and as requested by the DPHI, APP seeks your input into the scope of the audit and advice on any particular areas where you would like us to focus on.

Kind regards,

Sanan Qasim

Environmental Consultant – HSEQ Systems and Auditing



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Appendix G – Audit Photos

WCC Site Inspection Photos – 6 February 2025



Sandbags placed along the swale drain leading to the WCC onsite dam managed by the school.



Sediment fence installed with sandbags and coir logs along the ATF fence at the site entrance.

WCC Site Inspection Photos – 6 February 2025



Sprinkler system installed along the driveway for dust suppression. Water pooled from rain the night before contained within the site boundary.



Sediment fence installed along the site boundary throughout the site. Designated areas for material storage.

WCC Site Inspection Photos – 6 February 2025



Rumble grid installed at the driveway.



Pit drain fully covered with geofab.

WCC Site Inspection Photos – 6 February 2025



Rainwater is collected in the WCC dam.



Sediment fence installed around nominated stockpile area and aligned to the erosion and sediment control plan.

WCC Site Inspection Photos – 6 February 2025

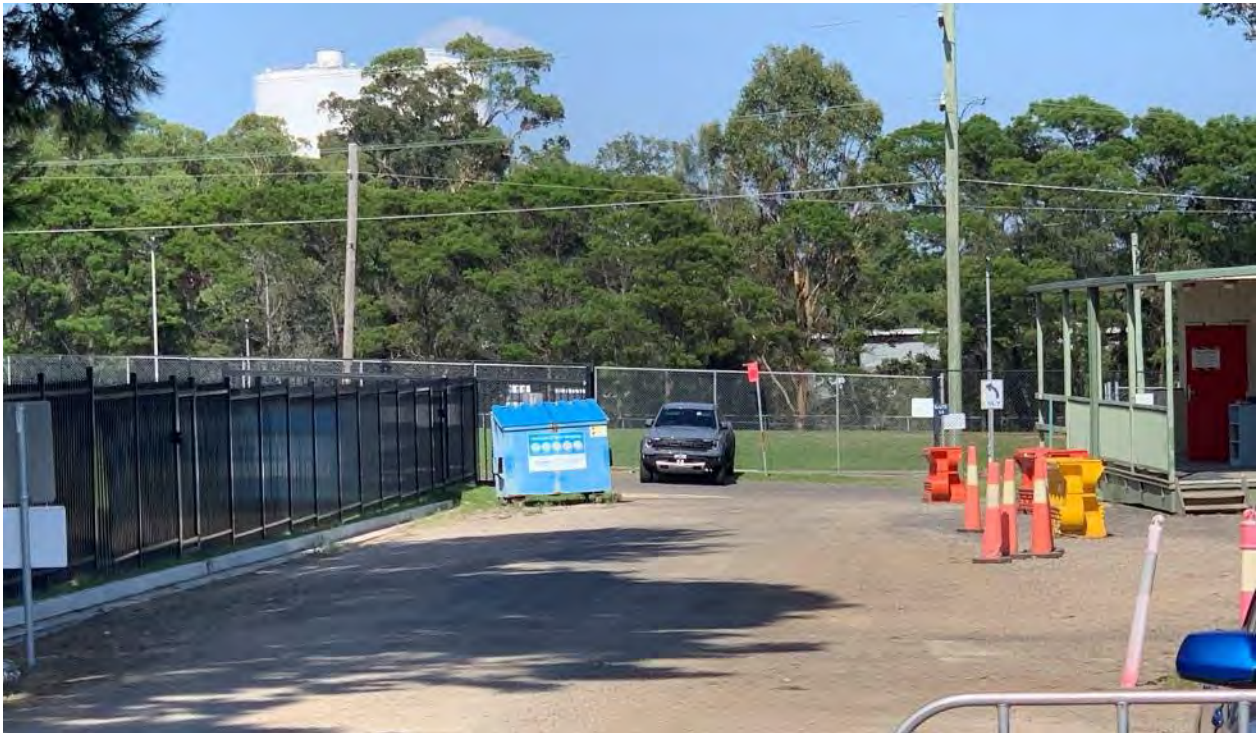


Irrigation sprinkler in place for dust suppression and soil stabilisation on stockpile area.



Topsoil retained for future use.

WCC Site Inspection Photos – 6 February 2025



Future waste collection area.



Temporary pedestrian bridge and Tower Crane installed on site.

WCC Site Inspection Photos – 6 February 2025



Purple Cow truck on-site to replace the filled skip bin with an empty one.



Emergency Spill Kit available on site.

WCC Site Inspection Photos – 6 February 2025



Tree Protection Zone established with a sediment fence installed around its perimeter.



Construction activities were in progress with no dust observed.

WCC Site Inspection Photos – 6 February 2025



Worker using water hose as vehicle exits the site.



Sediment fence installed along the site boundary.

WCC Site Inspection Photos – 6 February 2025



90% foundation of Bryson Building has been completed.



Noise Monitor recently installed on site with data still to be collected.

WCC Site Inspection Photos – 6 February 2025



Construction vehicles wholly contained within the site boundary.



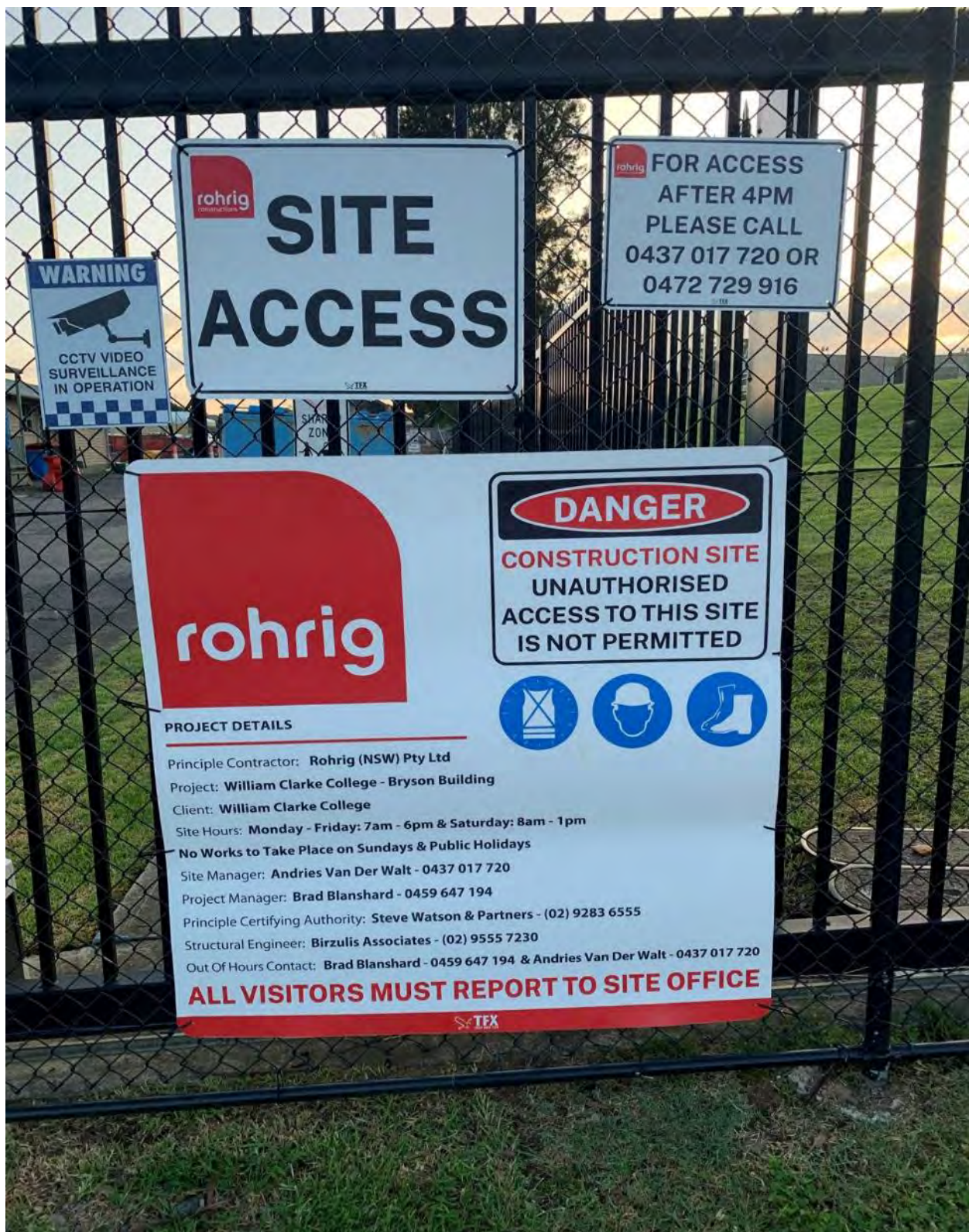
ATF fencing installed around the entire site premises.

WCC Audit Site Inspection Observations – 6 February 2025



OBS-01: The Site Notice displayed at the time of the audit did not include the name of the Certifier or Structural Engineer. Refer to non-compliance raised under Condition D1.

WCC Audit Site Inspection Observations – 6 February 2025



Close Out: Following the audit, photo provided from Rohrig showing new site notice has been installed, displaying the contact details of the certifier and structural engineer.

WCC Audit Site Inspection Observations – 6 February 2025



OBS-02: A spill kit was not available near the chemical storage area.



Close Out: A spill kit is being relocated next to the chemical storage area.

WCC Audit Site Inspection Observations – 6 February 2025



OBS-03: A general waste bin was placed in front of the fire extinguisher, restricting access.



Close Out: The project team promptly removed the bin to restore clear access to the fire extinguisher.



The APP Group

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