



**SSD 8996 – Independent Environmental Audit Report**  
**Carmichael Tompkins Property Group**  
**Redevelopment of the Loreto Normanhurst Secondary School**  
**Normanhurst, NSW**  
**SA220009.01**  
**4 September 2023**

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## EXECUTIVE SUMMARY

Carmichael Tompkins Property Group (CTPG) on behalf of Loreto Normanhurst (the Applicant) engaged Epic to undertake an Independent Environmental Audit (IEA) for the Stage 1 (comprising of sub-stages 1, 2 & 3 post construction and substage 4 pre-construction) construction works at the Loreto Normanhurst School (the site). This document outlines the method, findings, and recommended actions for the first six monthly audit post the initial audit (IEA #2). The IEA was undertaken between 6 March 2023 to 28 April 2023. The IEA scope included activities undertaken between June 2022 and April 2023.

As per conditions D37 and D38 of the State Significant Development (SSD) 8996 Development Consent (the Development Consent), an IEA is required to be conducted in accordance with the Department of Planning and Environment 's *Independent Audit Post Approval Requirements (2020)*.

The IEA criteria are the requirements which the site will be assessed against. The IEA criteria for the site will be as follows:

- Conditions of SSD 8996: Schedule 3, Parts A – E
- Community Consultation Plan (CCP)
- Construction Environmental Management Plan (CEMP)
- Construction Pedestrian and Traffic Management Plan (CPTMP)
- Construction Noise and Vibration Management Plan (CNVMP)
- Construction Soil and Water Management Plan (CSWMP)
- Construction Waste Management Sub-plan (CWMP)

The IEA comprised of an opening meeting, IEA interviews, site inspection and a closing meeting. A suite of evidence and material was provided by the Applicant's representative to verify the findings of the IEA.

## IEA FINDINGS

Overall, the Applicant demonstrated compliance against **91%** of the overall IEA criteria. The audit criteria comprised a total of 179 individual Development Consent conditions and 55 management requirements. Across the IEA criteria a total of 16 non-compliances were identified (twelve for the development consent and four for the Management Plans).

In addition to the high level of compliance / conformance demonstrated by the Applicant, Epic identified multiple positive observations during the IEA. These included a comprehensive construction environmental management plan and sub-plans, effective management of the environmental risks on-site and evidence of measures implemented on site to prevent material harm to the environment such as erosion and sediment controls, street sweeping, dust, and waste management.

A summary of the key non-compliances identified during the IEA include:

- Based on Table 1 of the *Independent Audit Post Approval Requirements (2020)*:
  - The initial IEA due on 14 March 2022, however it was undertaken 16 June 2022 - therefore was after the deadline prescribed under the *Independent Audit Post Approval Requirements (2020)*
  - The IEA report was submitted outside of the required timeframes as outlined in Table 1 (from the date the site inspection occurred)
  - In accordance with the required schedule, this IEA was due to be undertaken in December 2022, however it was undertaken in March 2023 and therefore was after the deadline prescribed under the *Independent Audit Post Approval Requirements (2020)*
- The required consultation with relevant parties for the following could not be verified:
  - Preparation of the Construction Pedestrian and Traffic Management Plan (CPTMP) and the Construction Soil and Water Management Plan (CSWMP)
- No evidence of the archival records being provided to Council
- The Construction Environment Management Plan (CEMP) and some associated sub-plans did not meet the minimum requirements of the *Environmental Management Plan Guideline: Guideline for Infrastructure Projects*

- Some elements of the CSWMP, CPTMP and the Construction Noise and Vibration Management Plan (CNVMP) had not been implemented during construction of substages 1 – 3
- A review of the CNVMP every six months by the contractor and the acoustic consultant had not occurred
- Noise monitoring had not occurred to date as required by the commitment outlined in the CNVMP
- The waste disposal register did not describe the ultimate fate of material leaving the site

#### IEA ACTION PLAN

Based on the IEA findings an action plan has been prepared to address non-compliances or to improve overall environmental management.

A summary of the actions recommended to address non-compliances include:

- Ensure compliance audits are undertaken in accordance with the schedule outlined in the *Independent Audit Post Approval Requirements (2020)*
- Ensure compliance audit reports are submitted within the requirement timeframe outlined in the *Independent Audit Post Approval Requirements (2020)*
- Ensure consultation is undertaken with the relevant parties when developing management plans (future substages 4 - 6):
  - Provide the CPTMP to Council and TfNSW and the CSWMP to Council for comment. Document any comments / discussions with Council and TfNSW and update the CPTMP and CSWMP accordingly. Provide the updated CPTMP and CSWMP to the Planning Secretary including records of completed consultation
  - Provide the archival recordings to Council for information as required by Condition C4
  - Ensure the CEMP, CPTMP and CSWMP address the requirements of the *Environmental Management Plan Guideline: Guideline for Infrastructure Projects*
- Ensure the waste register includes a column that identifies the fate of the waste material leaving site
- Ensure documentation to be provided to relevant parties is submitted within the timeframes outlined in the conditions of approval and maintain evidence of the submission of such documentation.

Implementations of these actions will be verified in the subsequent IEA.

## 1 INTRODUCTION

Epic Environmental Pty Ltd (Epic) has been engaged by Carmichael Tompkins Property Group (CTPG) on behalf of Loreto Normanhurst (the Applicant) to undertake an Independent Environmental Audit (IEA) for the Stage 1 construction works (comprising of sub-stages 1, 2 & 3 post construction and substage 4 preconstruction) at the Loreto Normanhurst School (the site). The IEA was undertaken in response to conditions D37 and D38 of the State Significant Development (SSD) 8996 consent.

The IEA was undertaken between 6 March 2023 and 28 April 2023. This document outlines the method, findings, and recommended actions of the 2022 IEA undertaken at the site.

### 1.1 Background

CTPG has been engaged by the Applicant to manage the construction of Stage 1 of the re-development of Loreto Normanhurst School (the development), located at 91-93 Pennant Hills Road, Normanhurst NSW 2076. CTPG engaged Cowyn Building Group (the Contractor) to construct sub-stages 1, 2 and 3 of Stage 1 of the development. Sub-stages 4, 5 and 6 had not commenced at the time of this IEA.

In summary Stage 1 of the development comprised of (as per SSD 8996):

- **Sub-stage 1:** Reconfiguration and landscaping of P3A Osbourne Road Carpark
- **Sub-stage 2:** Construct through site road including 3 pick-up/drop-off spaces and landscaping
- **Sub-stage 3:** Including:
  - Reconfigure P2 Admin/Chapel and Pennant Hills carparks
  - Demolish existing tennis courts and sheds
  - Construct P1A Tennis Court carpark including two new tennis courts.
  - Surrounding landscaping
- **Sub-stage 4:** Including:
  - Relocate uniform shop
  - Demolish Loreto. Community House and associated buildings
  - Construct boarding accommodation building
  - Reconfigure P4 Primary carpark
  - Surrounding landscaping
- **Sub-stage 5:** Including:
  - Demolish 3 multi-purpose courts/structures
  - Construct P4A Multipurpose carpark including three new multi-purpose courts
- **Sub-stage 6:** No physical works (except for provision of 10 bicycle parking spaces)

### 1.2 IEA Particulars

Details of the particulars relevant to this IEA have been provided in **Table 1**.

**Table 1. IEA Particulars**

Particular	Details
Applicant	Loreto Normanhurst
Applicant Representative	Carmichael Tompkins Property Group
Principal Contractor (sub-stages 1 – 3)	Cowyn Building Group
Principal Contractor (sub-stages 4 – 6)	Not engaged
Contractor commencement	23 November 2021
Construction Commencement	20 December 2021
IEA Period (Any activity or evidence that was not within this IEA period was not included in the scope of the audit)	June 2022 and April 2023
IEA site inspection	16 March 2023
IEA document review	6 March – 28 April 2023
Status of works during site inspection	- Sub-stages 1, 2 and 3 completed - Sub-stages 4 – 6 not yet commenced

### 1.3 IEA Team

The IEA team members are listed in **Table 2**. In accordance with Condition D37 of the SSD consent, an approval for the appointment of an independent audit team for the IEA was granted by the Department of Planning and Environment (DP&E) on 1/03/2023 (**Appendix A**). The auditors confirm their independence, and the signed Independent Environmental Audit Declaration Form has been provided in **Appendix B**.

**Table 2. IEA Team**

Person	Auditing Role	Years' Experience	Qualifications
Kirsty Douglas	Lead Auditor	17	Lead Auditor (Exemplar Global, No. 210439), BEnvSci (Conservation Biology and Ecology), GCert IAP2 Australasia
Chris Griffiths	PM and Auditor Assistant	16	Lead Auditor (BSI Training Centre), DSCi (Environmental Management)

### 1.4 IEA Objective

The key objectives of the IEA are to:

- Assess whether the project is being undertaken from an environmental point of view in accordance with best practice, standards, and legislative requirements
- Assess the overall environmental performance of the project on the surrounding environment and sensitive receptors
- Review the implementation of environmental management plans developed in accordance with the conditions of consent
- Provide recommended actions for the overall improvement of environmental performance of the project

### 1.5 IEA Scope

The IEA scope will include activities undertaken at the site, in relation to the Stage 1 construction works (substages 1 – 4) for the redevelopment of the Loreto Normanhurst School, Normanhurst NSW with respect to Parts A to E of the SSD 8996 development consent, the Construction Environmental Management Plan (CEMP) and relevant environmental sub-plans.



## 2 IEA METHOD

### 2.1 Method Development

The IEA method was developed with reference to:

- *Independent Audit Post Approval Requirements* (DP&E, 2020)
- *ISO 19011: 2019 Guidelines for Auditing Management Systems*

### 2.2 IEA Program

The IEA was undertaken in accordance with the program provided in **Table 3**.

**Table 3. IEA Program**

Proposed Date	Task / Description	Participants
<b>Phase I - Project Preparations</b>		
06/03/23	Provision of management plans required for the IEA	CTPG
06/03/23	Preparation and provision of IEA Plan	Epic
06/03/23– 10/03/23	Undertake a preliminary document review	Epic
13/06/22 – 15/06/22	Develop the IEA checklist and questionnaire	Epic
<b>Phase II – Site Inspections and Interviews</b>		
	Opening Meeting	All
16/03/23	Site inspection	Epic & CTPG
14/03/23 - 16/03/23	IEA Interviews	Epic & CTPG
16/06/22 – 28/04/23	Evidence provision and collation	Epic & CTPG
<b>Phase III – IEA Reporting</b>		
16/06/22 – 28/04/23	Detailed evidence review, and recommended	Epic
28/04/23 – 10/05/23	Prepare draft report for review	Epic & CTPG
12/05/23	Closing Meeting and recommended actions review	Epic & CTPG
12/05/23	Issue the final IEA report	Epic

### 2.3 Pre-Audit Consultation

Upon engagement, the IEA team held a kick-off meeting with CTPG to discuss the IEA process, expectations, and to detail information requirements prior to undertaking the IEA.

### 2.4 IEA Tools

The following tools were used during the IEA. These tools assisted in defining the scope of the IEA, captured any issues identified during the IEA and allowed for the discussion of potential actions on how these items can be rectified. The tools included:

- IEA Plan (**Appendix C**)
- Opening meeting agenda and minutes
- IEA checklist (**Appendix D**) and interview questions

## 2.5 IEA Criteria

The IEA criteria are the requirements which the site will be assessed against. The IEA criteria for the site will be as follows:

- Conditions of SSD 8996: Schedule 3 Parts A – E (the Development Consent)
- Community Consultation Plan (CCP)
- Construction Environmental Management Plan (CEMP)
- Construction Pedestrian and Traffic Management Plan (CPTMP)
- Construction Noise and Vibration Management Plan (CNVMP)
- Construction Soil and Water Management Plan (CSWMP)
- Construction Waste Management Sub-plan (CWMP)

## 2.6 IEA Compliance Rating

The compliance assessment ratings used in the IEA assessment are outlined in **Table 4**.

**Table 4. IEA Scoring Criteria**

IEA Rating	Definition
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or management plan requirement have been complied with within the scope of the IEA.
Non-compliant	The Auditor has determined that one or more specific elements of the conditions or management plan requirements have not been complied with within the scope of the IEA.
Not Triggered	A condition or requirement has an activation or timing trigger that has not been met during the defined IEA period (which may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

## 2.7 Site Inspection

A site inspection was undertaken on 16 March 2023 to visually verify compliance with the IEA criteria. Weather on the day of the site inspection was sunny, with a low of 18 °C with a high of 36 °C (BOM, 2023). No rain fell on the day of inspection at the Observatory Hill weather station. During the seven days prior to the site inspection Observatory Hill weather station recorded approximately 10 mm rain over two days. The IEA team were escorted by a Contractor representative during the site inspection. The IEA team were provided unrestricted access to the site to verify compliance.

## 2.8 IEA Interviews

Key staff interviewed during the IEA were:

- Representative from CTPG:
  - Project Manager Substages 1 -3: Luke Gladwish
  - Project Manager Substages 4: Rocco Bombardiere

During the IEA, CTPG acted as representative of the Applicant and provided all available evidence verifying compliance of the Applicant’s responsibilities under the Development Consent. Interviews were held both on site and via teleconference.

## 2.9 IEA Evidence

A comprehensive suite of evidence and material was provided by CTPG to verify the findings of the IEA. The list of material provided and reviewed during the IEA included:

- The CEMP, including the sub-plans
- Student and teacher numbers
- Amendments to approved plans (staging reports, post approval form and approval from DPI&E)

- Bushfire Protection Assessment
- Construction contractor requirements
- Construction notifications to DPI&E
- Construction certificates
- Certifier reports
- Loreto Normanhurst Redevelopment Master Plan website
- Archival Heritage Report
- Dilapidation reports/letters
- Development Contributions
- Community consultation strategy
- Demolition plans
- Biodiversity offset documentation
- Arborist / Horticultural reports
- Vegetation clearing reports
- Contaminated land assessments/reporting
- Contaminated land auditor correspondence
- Approved drawings and plans
- Site inductions (including records), toolbox meetings
- Inspection forms and reports
- Environmental monitoring records
- Waste records
- Community newsletters
- Construction certifications
- Occupation certifications
- Compliance certificates
- IFC drawings

All other evidence noted during the IEA not listed above was observed on CTPG's document control system or visually observed during the IEA interviews.

### 3 IEA FINDINGS

#### 3.1 Overall IEA Results

Overall, the Applicant demonstrated compliance against **91%** of the IEA criteria (including 90% compliance against the Development Consent conditions and 92% against the commitments made in the management plans). A total of 179 individual Development Consent conditions were audited across the IEA criteria with 54 of those conditions classified as not triggered (NT) and twelve non-compliances (NCs) at the time of the IEA. An additional 55 requirements (commitments made in the approved construction management plans and subplans) were audited, with six of those commitments classified as NT and four NCs at the time of the IEA.

The complete IEA checklist is included in **Appendix D**. Details of positive observations, compliances and non-compliances, are detailed in the subsequent sections.

The overall IEA results have been shown in **Figure 1**.

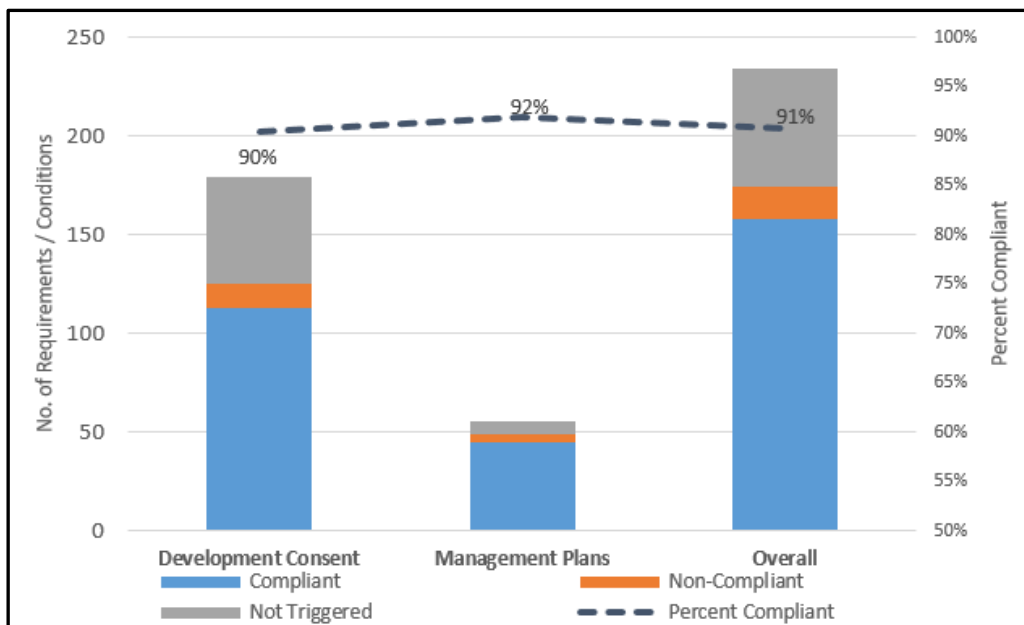


Figure 1. Overall IEA Result.

#### 3.2 Positive Observations

A number of positive observations were noted during the IEA including:

- Project strategies, plans (including management plans), programs, and drawings were up to date, and certified by third parties (where required) as being compliant with the relevant conditions
- The CEMP and associated sub-plans were comprehensive and addressed all requirements of the relevant conditions
- A Community Consultation Strategy has been developed and implemented, including the establishment of a Community Consultative Committee
- Works were conformant with the approved staging schedule
- The site had been left in a stable condition:
  - Substages 1- 3
    - All landscaping was complete
  - Substage 4
    - All exposed areas were covered in geofab
  - Substages 1- 4
    - No evidence of sediment entering the stormwater drainage system

- All waste associated with construction works had been removed offsite
- All temporary buildings associated with construction (crib huts, storage areas etc) had been removed off site

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

No agency notices, orders, penalty notices and prosecutions were noted for the site during the IEA period.

### 3.4 Status of the Initial 2022 IEA Findings

The initial 2022 IEA provided a total of twelve recommendations against:

- Twelve NCs:
  - Eight against the development consent
  - Four against the approved management plans
- Four opportunities for improvement:
  - Two against the development consent
  - Two against the approved management plans approved management plans

Substages 1 – 3 were complete at the time of this IEA, therefore the recommendations made in the Initial 2022 IEA were not retrospectively implemented.

Of the ten recommendations, this IEA identified that nine recommendations have been closed out and one recommendation remains open which will be addressed in Substage 4.

The status of each of the initial 2022 IEA recommendations and the proposed actions by the Applicant are provided in **Table 5**.

Table 5. 2022 Initial IEA Recommendations and Actions Status

Reference	Recommended Actions (Initial 2022 IEA)	Findings (This IEA)	Status
<b>Non Conformances</b>			
A19	Provide the Construction Pedestrian and Traffic Management Plan (CPTMP) to Council and TfNSW and the Construction Soil and Water Management Plan (CSWMP) to Council for comment. Document any comments / discussions with consultation parties and update the CPTMP and CSWMP accordingly. Provide the updated CPTMP and CSWMP to the Planning Secretary including records of completed consultation.	Substages 1 – 3 were complete at the time of this IEA with Substage 4 yet to commence. Therefore, the recommended action was not implemented retrospectively for substage 1 – 3. For future construction stages, the Applicant will ensure consultation occurs with the identified parties as required by the relevant conditions of the development consent.	Closed
C16(b)			
C18(a)			
C4	Provide the archival recordings to Council for information as required by Condition C4.	Substages 1 – 3 were complete at the time of this IEA with Substage 4 yet to commence. Therefore, the recommended action was not implemented retrospectively for substage 1 – 3. Where archival recordings are required for future construction stages, they will be provided to Council as required by this condition.	Closed
C13	Update the CEMP, CPTMP and CSWMP to address the requirements of the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> .	Substages 1 – 3 were complete at the time of this IEA with Substage 4 yet to commence. Therefore, the recommended action was not implemented retrospectively for substage 1 – 3. This will be taken as a note for CTPG's review of documentation prepared by future contractors.	Closed
C25	The non-compliance related to an event in the past there is no action that could be applied that would address the matter retrospectively. Therefore the Applicant should notify the Planning Secretary of the non-compliance via submission of the IEA report.	The non-conformance was notified to the Planning Secretary through the submission of the initial 2022 IEA.	Closed
D9	Update the waste register to include a column that identifies the fate (i.e. reused, recycled, stockpiled, or disposed) of the waste material leaving site. This column should be completed for all future waste material leaving the site.	Substages 1 – 3 were complete at the time of this IEA with Substage 4 yet to commence. Therefore, the recommended action was not implemented retrospectively for substage 1 – 3. This will be taken as a note for CTPG's review of documentation prepared by future contractors.	Closed
CWMSP - Section 8.2			
D9	Review and update s4.17 of the CPTMP to replace the wheel wash requirement with alternative measures to achieve the same outcome. Examples of alternative measures include:		Closed
CPTMP - Section 4.17	<ul style="list-style-type: none"> <li>Daily inspections by the site manager and deploying street sweeper if required</li> <li>Vehicles entering and leaving the site must be directed to hardstand areas</li> </ul>		

Reference	Recommended Actions (Initial 2022 IEA)	Findings (This IEA)	Status
D9 CNVMP - Section 11.3.1 & 11.3.2	Review and update s11.3.1 and 11.3.2 of the CNVMP to only require a review and update of the management plan in the event an investigation of a complaint determines further mitigation measures are required.		Closed
D38	The method of this IEA was developed and executed in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> . Notwithstanding the above, Table 1 of the <i>Independent Audit Post Approval Requirements (2020)</i> , requires the initial IEA be undertaken within 12 weeks of the commencement of construction. This IEA is considered to be the initial IEA as no previous IEAs have been completed. As construction commenced on 20 December 2021 in accordance with Table 1 of the <i>Independent Audit Post Approval Requirements (2020)</i> , the initial IEA was due on 14 March 2022. This IEA was undertaken 16 June 2022 and therefore was after the deadline prescribed under the <i>Independent Audit Post Approval Requirements (2020)</i> .	Substages 1 – 3 were complete at the time of this IEA with Substage 4 yet to commence. Therefore, the recommended action was not implemented retrospectively for substage 1 – 3. The due date for the initial IEA was lapsed and no further actions can be applied to retrospectively rectify the non-compliance. All future IEAs will be scheduled in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> .	Open
<b>Opportunities for Improvement</b>			
D16	Update the CNVMP to address the following vibration criteria: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006)	Substages 1 – 3 were complete at the time of this IEA with Substage 4 yet to commence. Therefore, the recommended action was not implemented retrospectively for substage 1 – 3. This will be taken as a note for CTPG's review of documentation prepared by future contractors.	Closed
D32	Update the waste register to include a column that identifies the fate (i.e. reused, recycled, stockpiled, or disposed) of waste material leaving site. This column should be completed for all future waste material leaving site.	Substages 1 – 3 were complete at the time of this IEA with Substage 4 yet to commence. Therefore, the recommended action was not implemented retrospectively for substage 1 – 3. For all future construction stages, the relevant contractor will be made aware of the requirement to maintain a waste register that identifies the fate of the waste material leaving site.	Closed
CWMSP - Section 1.2	Include a document control sheet on the cover page of all management plans that requires a document approver to initial and approve the final revision of the document.	Substages 1 – 3 were complete at the time of this IEA with Substage 4 yet to commence. Therefore, the recommended action was not implemented retrospectively for substage 1 – 3. This will be taken as a note for CTPG's review of documentation prepared by future contractors.	Closed

Reference	Recommended Actions (Initial 2022 IEA)	Findings (This IEA)	Status
CWMS – Section 7.4	<p>Liaise with the waste contractor and request that a monthly report be provided going forward. The monthly report should include the following detail for waste removed offsite (for the previous month), including the:</p> <ul style="list-style-type: none"> <li>● Type of waste</li> <li>● Volume/quantity of each waste type</li> <li>● Destination and fate of waste (e.g. landfill, recycled, reused etc)</li> </ul>	<p>Substages 1 – 3 were complete at the time of this IEA with Substage 4 yet to commence. Therefore, the recommended action was not implemented retrospectively for substage 1 – 3.</p> <p>For all future construction stages, the waste contractor will be made aware of the requirement to maintain a waste register that identifies the fate of the waste material leaving site.</p>	Closed



### 3.5 Development Consent

The Applicant was found to be **90%** compliant with the conditions of the SSD8996. Notable observations of compliance included:

- Community engagement had been undertaken
- Record management was generally well maintained
- Site inspections and audits had been completed
- Certification for construction and occupation received
- The site for substages 1- 3 had been left in a stable condition post construction
  - Landscaping was complete
  - No evidence of sediment / debris build up observed in the stormwater pits
- The site for substage 4 was left in a stable condition
  - All exposed areas had been covered in geofab
  - Screening had been installed the fence

Twelve non-compliances were identified during the IEA, of which nine are NCs that were in the initial 2022 IEA. Substages 1 – 3 were complete at the time of this IEA, with substage 4 yet to commence, therefore the recommended actions for these NCs were not implemented retrospectively. All NC's have been detailed in **Table 6**.

Recommended actions to address the non-compliance and other identified opportunities for improvement have been provided in **Section 4**, a complete action plan for addressing all findings of the IEA have been provided in **Appendix F**.

**Table 6. IEA Findings – Development Consent**

Condition	Requirement	Assessment	IEA Finding
A19	<p>Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <p>(a) consult with the relevant party prior to submitting the subject document for information or approval; and</p> <p>(b) provide details of the consultation undertaken including:</p> <p>(i) the outcome of that consultation, matters resolved and unresolved; and</p> <p>(ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p>	Non-Compliant	<p>This condition requires for consultation triggered by the consent to be undertaken prior to submission of the document for approval. Such consultation is required under sub-clauses C5(a) (Pre-Construction Dilapidation Survey Report), C16(b) (Construction Pedestrian and Traffic Management Plan) and C18(a) (Construction Soil and Water Management Plan). Whilst the consultation required under C5(a), the consultation required under C16(b) and C18(a) was not confirmed during the initial 2022 IEA.</p> <p>Substage 1 - 3 were complete at the time of this IEA and evidence had not been sought retrospectively.</p> <p>The Auditee confirmed that prior to the commencement of substages 4 -6, the relevant management plans will be submitted to the TfNSW and Council.</p>
A36	<p>Within three months of:</p> <p>(a) the submission of a compliance report under Schedule 3 condition A38;</p> <p>(b) the submission of an incident report under Schedule 3 condition A32;</p> <p>(c) the submission of an Independent Audit under Schedule 3 condition D37;</p> <p>(d) the approval of any modification of the conditions of this consent; or</p> <p>(e) the issue of a direction of the Planning Secretary under Schedule 3 condition A2 which requires a review</p> <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.</p>	Non-Compliant	<p>The initial IEA was undertaken between June and July 2022, with the IEA report submitted to the Planning Secretary in October 2022. Subsequently the Planning Secretary requested additional information be provided in relation to the IEA (dated 17/02/2023 and 21/03/2023). All items were addressed, and a final report was submitted and accepted by the Department in March 2023.</p> <p>The requirement to undertake a review of the strategies, plans and programs required under this consent within 3 months of (c) the submission of an Independent Audit under Schedule 3 condition D37 did not occur as works for substage 1 - 3 as works were complete prior to the submission of the initial 2022 IEA Report.</p> <p>The Auditee confirmed that all strategies, plans and programs will be updated as required for future stages of the project (substages 4 – 6).</p>
A38	<p>Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).</p>	Non-Compliant	<p>The method of this IEA was developed and executed in accordance with the Independent Audit Post Approval Requirements (2020).</p> <p>Table 1 of the Independent Audit Post Approval Requirements (2020) requires the initial IEA be undertaken within 12 weeks of the commencement of construction and then at intervals no greater than 26 weeks from the date of the initial independent audit.</p> <p>The initial 2022 IEA was undertaken 16 June 2022 (was due in March 2022), with the IEA report submitted to DPE 10 November 2022. This IEA was due to be undertaken in December 2022, however it was completed in March 2023, therefore was after the deadline prescribed under the Independent Audit Post Approval Requirements (2020).</p>

Condition	Requirement	Assessment	IEA Finding
A39	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.	Non-Compliant	The initial 2022 IEA report was not submitted within the timeframes outlined in Table 1 Compliance Reporting Post Approval Requirements (2020).
C4	Prior to any demolition and/or alteration works commencing on the site in Stage 1 on the site, archival photographic recordings must be undertaken for significant building fabric and spaces, as specified by a qualified heritage consultant. The archival recordings must specifically include a detailed account of internal and external components of the buildings / spaces and context photographs of the existing site as viewed from the street and its surroundings. A copy of the final recordings must be submitted to the Certifier and Council for information.	Non-Compliant	The majority of the requirements of this conditions were complied with for substage 1 - 3, however a copy of the final recordings was not submitted to Council. Substages 1 - 3 were completed at the time of this IEA. The Auditee confirmed that prior to substage 4 - 6, the archival recordings will be provided to Council for information as required by this condition.
C13	Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (OPIE April 2020). Notes: <ul style="list-style-type: none"> <li>The Environmental Management Plan Guideline is available on the Planning Portal at: <a href="https://www.planningportal.nsw.gov.au/majorprojects/assessment/post-approval">https://www.planningportal.nsw.gov.au/majorprojects/assessment/post-approval</a></li> <li>The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</li> </ul>	Non-Compliant	A review of the CEMP and subplans addressed most of the requirements in the Environmental Management Plan Guideline, however there were several elements that were not addressed, however substages 1 - 3 were complete prior to the final 2022 IEA being submitted to the Planning Secretary, therefore the plans were not amended. The Auditee confirmed that prior to the commencement of substages 4 - 6, the CEMP, and subplans yet to be developed will address the requirements of the Environmental Management Plan Guideline: Guideline for Infrastructure Projects.
C16(b)	A 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: (a) be prepared by a suitably qualified and experienced person(s)	Non-Compliant	The majority of the requirements of this condition were complied with, however 16b) was identified as a NC in the initial 2022 IEA. Sub-condition C16(b) requires for the CPTMP to be prepared in consultation with Council and TfNSW. During the IEA no evidence of such consultation being completed was provided. Substage 1 -3 were completed prior to the final IEA being issued to the Planning Secretary, therefore the CTPMSP was not updated retrospectively. The Auditee confirmed that the CTPMSP developed for substage 4 will be developed in accordance with the requirements of this condition.
C18(a)	The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council;	Non-Compliant	A review of the CSEMP identified that the majority of the requirements of this condition were complied with, however 18a) was identified as a NC in the initial 2022 IEA. Sub-condition C18(a) requires for the CSWMP to be prepared in consultation with Council, however no evidence of consultation was provided during this IEA.

Condition	Requirement	Assessment	IEA Finding
			Substage 1 -3 were completed prior to the final IEA being issued to the Planning Secretary, therefore the CWSMP was not updated. The Auditee confirmed that the CSWMP developed for substages 4 - 6 will be developed in accordance with e requirements of this condition.
D9	The Applicant must carry out the construction of the development in accordance with the most recent version of the submitted CEMP (including Sub-Plans).	Non-Compliant	Implementation of the CEMP and associated sub-plans identified the following NCs: <ul style="list-style-type: none"> <li>• One element of the CSWMP not implemented</li> <li>• One element of the CPTMP not implemented</li> <li>• Two elements of the CNVMP not implemented</li> </ul> Substage 1 - 3 were complete at the time of the submission of the IEA to the Planning Secretary, therefore the relevant management plans did not undergo a review and update.
D38	Independent Audits of the development must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> .	Non-Complaint	The method for the initial 2022 IEA undertaken by Epic Environmental was developed and executed in accordance with the Independent Audit Post Approval Requirements (2020). In accordance with Table 1 of the Independent Audit Post Approval Requirements (2020), the initial IEA is required to be undertaken within 12 weeks of the commencement of construction (14 March 2022), however it was undertaken 16 June 2022 and therefore after the deadline prescribed in Table 1 of the Independent Audit Post Approval Requirements (2020).
D40	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under Schedule 3 condition D38 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 after submission to the Planning Secretary.	Non-Complaint	The initial 2022 IEA Report was submitted to the Planning Secretary, however no evidence of it being submitted to the certifier was obtained during this IEA. The initial 2022 IEA Report was not made publicly available within 60 days after submission to the Planning Secretary (submitted October 2022) Note: the Planning Secretary requested additional information in February and March 2023. Based on these dates, the IEA is to be made publicly available in May 2023. This IEA is to be made publicly available in July 2023.
D41	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 Requirements (2020), unless otherwise agreed by the Planning Secretary.	Non-Complaint	The initial 2022 IEA Report was submitted to the Planning Secretary outside of the required timeframe prescribed in the Independent Audit Post Approval Requirements (2020).

### 3.6 CEMP and Associated Sub-Plans

The Applicant was found to be **92%** conformant with the audited requirements of the CEMP and associated sub-plans.

Notable observations of conformance included:

- The CEMP and associated subplans were comprehensive and covered all requirements under the development consent conditions
- Environmental management records required under the CEMP (including inspection sheets, waste receipts, contaminated land assessments, fill validation, training etc.) were well maintained
- Environmental inspections were being undertaken on a weekly basis and records maintained and included in the monthly reporting

Four NC's were identified during the IEA (**Table 7**). These items were identified during the initial 2022 IEA. It should be noted that the initial 2022 audit report was accepted by the Planning Secretary after the completion of substages 1 – 3 were complete, therefore the actions associated with these items were not actioned. No new NC's were identified during this IEA:

**Table 7. IEA Findings – CEMP and associate Sub-Plans**

Management Plan / section	Requirement	Assessment	IEA Finding
Construction Waste Management Subplan (CWMSP) Clause 8.2	The CWMSP requires that Contractor record how and where waste material is reused, recycled, stockpiled, and disposed of.	Non-Compliant	The destination, transporter and date of material leaving the site is documented, however the waste disposal register does not describe the ultimate fate of the material leaving the site (i.e. reused, recycled, stockpiled, or disposed).
Construction Pedestrian and Traffic Management Plan (CPTMP) Clause 4.17	The CPTMP requires a wheel wash station to be positioned at the entry/exit point.	Non-Compliant	No wheel wash station was observed at the entry / exit point at the time of the site inspection, however there was no evidence of soil tracking into Mount Pleasant Avenue.
Construction Noise and Vibration Management Plan (CNVMP) Clause 11.3.1	The CNVMP requires an environmental management review with Contractor and the acoustic consultant (or adviser) be undertaken every six months.	Non-Compliant	No evidence of an environmental management review being undertaken within six months of the project commencing was observed.
Construction Noise and Vibration Management Plan (CNVMP) Clause 11.3.2	The CNVMP requires a review and continual improvement of the plan every six months and a review of noise monitoring every three months.	Non-Compliant	No evidence of a review or update of the plan was observed in the six months since the plan was completed.

Recommended actions to address the non-conformances and other identified opportunities for improvement have been provided in **Section 4**, a complete action plan for addressing all findings of the IEA have been provided in **Appendix F**.

### 3.7 Comparison of Predicted and Actual Impacts

An assessment of compliance between actual and predicted impacts as documented in the Environmental Impact Statement (EIS) (dated 19 June 2019) has been provided in **Table 8**.

**Table 8. Comparison Predicted and Actual Impacts**

Reference EIS Document	Predicted Impact	Observed Actual Impact during the IEA	Compliance Assessment
Stage 1 Works – S1 -003 & S1-004 (Allen Jack + Cottier, 18/05/2021)	Extent of works applicable to Sub-Stages 1,2 and 3 of the development	All works were observed to be within the boundaries of the Stage 1 scope identified within the approved drawing/s.	Compliant
Loreto Normanhurst Pennant Hills - SSSA Re-Submission Car Parks + Site Through Link Landscape Report (Oculus, July 2021)	Proposed landscaping and tree retention plan for the Sub-Stages 1,2 and 3 of the development	Completed landscaping on Carpark P3A, site road and drop-off spaces, carpark P2 were inconsistent with the approved landscape plans. Note landscaping had not commenced at the Carpark P1A at the time of the IEA.	Compliant
Environmental Impact Statement (Ethos Urban, 18 June 2019)	Solar Access and Overshadowing	The overshadowing was predicted from the Boarding House following the Stage 1 works. Construction works on the Boarding House had not been commenced at the time the IEA.	Not Triggered
Environmental Impact Statement (Ethos Urban, 18 June 2019)	View Impact and Visual Privacy – No impact predicted as a result of mitigations applied	At the time of IEA, it was determined there were minimal visual impacts from publicly accessible locations. Vegetation proposed to be retained for visual screening purposes was observed to be retained during the IEA.	Compliant
Heritage Impact Statement (Weir Phillips, January 2019)	Heritage Impacts – No impacts	At the time of the IEA no impacts on the identified structures of heritage significance were observed.	Compliant
Loreto Normanhurst Masterplan - Aboriginal Cultural Heritage Assessment (EcoLogical Australia, 17 December 2020)	Aboriginal Archaeology – No impacts	No impacts on aboriginal heritage sites were observed	Compliant
Transport Assessment Report (Ason Group, 22 January 2019)	As previously mentioned, the Stage 1 works site is located away from the main school buildings, In this regard, opportunities for pedestrian (staff and students) and construction vehicle interaction is minimised. Site hoarding will further limit access to areas undergoing construction within the campus. Loreto Normanhurst Management will also further liaise with the chosen builder to manage construction impacts and mitigate any construction – pedestrian conflicts.	Negligible construction related traffic impacts were observed during the construction phase, this included adequate separation of construction traffic and pedestrians.	Compliant
Construction & Operational Noise Report (Wilkinson Murray, January 2018)	Exceedances of noise management levels of up to 11dBA at residences to the east of the site may be expected during excavation period when major equipment is located on site. This magnitude of exceedance is consistent with similar sites where residences overlook the development.	No unreasonable noise levels were observed during the IEA. Mitigation measures proposed in a noise and vibration management plan were assessed as part of the scope of this IEA and considered suitable.	Compliant

Reference EIS Document	Predicted Impact	Observed Actual Impact during the IEA	Compliance Assessment
Construction & Operational Noise Report (Wilkinson Murray, January 2018)	The highest vibration impacts are expected when the construction equipment is located on the eastern side of the site near the residences. Accordingly, a minimum distance of 40m is to be maintained between vibration generating activities and the surrounding residential receivers.	Evidence of Pre-Construction Surveys and Dilapidation Reports were provided during the IEA. The minimum distance of 40 m was not observed to be exceeded from the Stage 1 work areas.	Compliant
Biodiversity Development Assessment Report (EcoLogical Australia, 14 January 2019)	As part of the concept proposal and Stage 1 works, 0.38ha of the planted Blue Gum High Forest vegetation community will require removal.	Vegetation cleared was observed to be within the boundaries of the Stage 1 scope identified within the approved drawing/s.	Compliant
Biodiversity Development Assessment Report (EcoLogical Australia, 14 January 2019)	No threatened flora or fauna species were recorded within the school site, including any microbat habitats within any of the school buildings on campus.	Vegetation cleared was observed to be within the boundaries of the Stage 1 scope identified within the approved drawing/s.	Compliant
Arboricultural Assessment Report (Earthscape Horticultural Services, January 2021)	Tree Removal and Protection - A total of 78 trees within or in proximity to the Stage 1 works area are identified as being necessary for removal. Of these, 72 trees will be replaced as part of the new Stage 1 landscape proposal.	Vegetation cleared was observed to be within the boundaries of the Stage 1 scope identified within the approved drawing/s. Specific tree retention and replacement planting had been observed however counts on the precise number of tree's removed or planted as part of the landscaping was beyond the scope of this IEA.	Compliant
Preliminary Site Investigation Report (Environmental Investigation Services, 30 April 2019)	The site is considered to have potential for moderate contamination, due to: <ul style="list-style-type: none"> <li>Polycyclic Aromatic Hydrocarbons (PAH) above the human health-based site assessment criteria;</li> <li>Total Recoverable Hydrocarbons, benzo(a)pyrene and zinc were encountered above the ecological based site assessment criteria;</li> <li>Minor elevations of some metals in groundwater were identified, however this is considered to be consistent with regional groundwater conditions and</li> <li>One fibre cement fragment collected from the surface of the site was found to contain chrysotile asbestos.</li> </ul>	An investigation undertaken by EnviroReview (22 February 2022) did not identify any additional contamination beyond what was identified as part of the Preliminary Site Investigation.	Compliant
Environmental Impact Statement (Ethos Urban, 18 June 2019)	The proposed control measures will prevent sediment laden stormwater from flowing into adjoining land,	No evidence of sediment laden waters being released from the site was observed during the IEA. It was noted two complaints regarding sediment leaving site had been	Compliant

Reference EIS Document	Predicted Impact	Observed Actual Impact during the IEA	Compliance Assessment
	nearby bushland or roadways during the construction phase of the development.	placed with the DPE. The auditor has determined these complaints had been investigated and adequately addressed.	
Bushfire Protection Assessment (EcoLogical Australia, 14 January 2019)	The site is managed by an existing Asset Protection Zone (APZ). The APZ setback required for the site under the Planning for Bushfire Protection (PBP) 2006 is 70m. The existing APZ is proposed to be retained under this application, and all future buildings including the Stage 1 works are situated outside the 70m APZ.	No additional potential bushfire impacts identified during the IEA.	Compliant
Waste Management Plan (Foresight Environmental, 14 January 2019)	Construction Waste Management – Table 14, Boarding House composition of construction waste by volume	The waste management area was observed during the IEA and did not indicate an exceedance of the waste generation rates identified in the EIS. A review of the project waste register indicated waste volumes and types were consistent with the estimates provided in the EIS.	Compliant



### 3.8 Environmental Performance and Community Feedback

Monitoring records were observed for the IEA period and demonstrated a high level of environmental performance across the site.

#### 3.8.1 Complaints

All complaints received are logged on the Feedback and Inquiries Register. This register for substages 1 – 3 was maintained by the Applicant's representative (CTPG). The Feedback and Inquiries Register is a live document that is continuously updated by the Applicant's representative.

A summary of complaints received during the audit period are outlined in **Table 9**. For further details, the complaints register can also be found on the Applicant's website (<https://www.loretonh.nsw.edu.au/pages/master-plan>).

#### 3.8.2 Community Feedback

All community feedback including complaints are discussed and recorded at the Community Consultative Committee. Records of CCC meetings including discussions related to complaints are published on the Applicant's website (<https://www.loretonh.nsw.edu.au/pages/master-plan>).

### 3.9 Incidents

No environmental incidents were noted during the IEA period.

**Table 9. Complaints Summary**

Date	Complaint Type/Description	Investigation	Project Response	Response Adequacy
19/07/2022	Concern about night works	Resident raised concerns about potential night works.	The project team confirmed that there is no scheduled nightworks required for this stage of the project. The light tower that was seen was required to finish the upper concrete slab due to the slow curing time of the concrete (winter).	Sufficient response noted
19/07/2022	Metal slab on road	Resident called to raised concern about a metal slab on the road.	The project team confirmed that metal slabs were placed on the road to protect the road surface from heavy vehicles driving over in the rain.	Sufficient response noted
28/07/2022	Traffic	Resident raised concerns about traffic surrounding Loreto Normanhurst, particularly during the afternoon peak period.	<p>The School has appointed traffic engineers to develop new traffic solutions, to be implemented in the first stage of the master plan. Loreto is in the process of making improvements to the pick-up and drop-off by moving cars to the Osborn Road car park. This will provide double the queuing capacity of the existing site, reducing the queuing on Osborn Road. It will also improve the ease of recirculation and remove the need to queue on the current steep entry driveway. Included in the first portion of the works will be a through-site road. The additional on-site road will increase the capacity of pick-up and drop-off up to five times what is currently available.</p> <p>Loreto is proactively implementing a Green Travel Plan to reduce the use of private cars at the site by senior students, staff, and parents dropping off and picking up students.</p> <p>Loreto is also increasing this provision of onsite car spaces to reduce the need for parking on surrounding streets.</p> <p>A detailed traffic assessment report was submitted to the Department of Planning and Environment (DPIE), which is available online here - <a href="https://mpweb.planningportal.nsw.gov.au/major-projects/project/10486">https://mpweb.planningportal.nsw.gov.au/major-projects/project/10486</a></p>	Sufficient response noted
2/08/2022	Traffic	Resident raised concerns about traffic banking up on Osborn Road and Pennant Hills Road.		
26-Aug-22	Traffic	Resident raised concerns about traffic congestion at the intersection of Mount Pleasant Avenue and Pennant Hills Road. Resident raised concerns about parking on Mount Pleasant Avenue resulting in a single lane of through traffic.		
8-Sep-22	Traffic	Resident raised concerns about traffic congestion on Mount Pleasant Avenue causing safety concerns. Resident raised concerns about parking on Mount Pleasant Avenue resulting in a single lane of through traffic. Resident requested Loreto advise neighbours of planned school events, so they are aware that parking may be an issue.		
14/09/2022	Traffic	Concern about congestion impacting vehicles crossing Pennant Hills Road from Normanhurst Road to Osborn Road.		

Date	Complaint Type/Description	Investigation	Project Response	Response Adequacy
15/09/2022	Traffic	Resident raised concerns about traffic banking up on Osborn Road and Pennant Hills Road.		
1/10/2022	Traffic	Resident raised concerns about traffic banking up on Osborn Road and Pennant Hills Road.		
19/08/2022	Traffic	Student and Resident raised concerns about pedestrian safety at the intersection of Mount Pleasant Avenue and Pennant Hills Road. Student and Resident requested traffic lights and a pedestrian crossing at the intersection of Mount Pleasant Avenue and Pennant Hills Road.	Loreto Normanhurst has provided a summary of all community comments received in relation to the traffic changes on Mount Pleasant Avenue to Hornsby Shire Council for the Council to determine the appropriate traffic and signage changes.	Sufficient response noted
19/09/2022	Traffic	Resident called regarding bollards blocking cars from using the school driveway.	The project team confirmed that the gates and bollards needed to be moved and opened through the construction programme. Information regarding traffic management was provided to the resident.	Sufficient response noted
22/11/2022	Construction trucks / Damage to the grass nature strip	Community member via DPE raised concerns about damage to the nature strip on Mount Pleasant Avenue.	A response was provided by the construction contractor disagreeing that the damage raised by council relates to any vehicles associated with the stage of development. The area of concern appears to be at 69 Mt pleasant avenue, approximately 520m from the main site entry located at 4 Mt Pleasant Avenue. The construction contractor confirmed that construction vehicles were: 1. Entering and exiting via the 4 Mt Pleasant Avenue access road. 2. Trucks turning circles were completed within the site completely off Mt pleasant Avenue. 3. Worker vehicles were predominately parking on site with overflow parking locally outside the site entry 2-8 Mt pleasant Avenue.	Sufficient response noted

## 4 RECOMMENDED ACTIONS

### 4.1 Non-Compliances

A total of twelve non-compliances were identified during this IEA, of which six are NCs from the initial 2022 IEA. These six NCs had not been actioned at the time of this IEA and are considered open.

Actions to address each of these NC's have been provided in **Table 10**. The complete action plan, including consideration by the Applicant has been provided in **Appendix F**.

Implementation of the action plan should be verified as part of the subsequent IEA.

**Table 10. Recommended Actions to Resolve Identified Non-Compliances**

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
<b>Development Consent</b>					
NC-01	<p><b>A19, Evidence of Consultation</b> Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <p>(a) consult with the relevant party prior to submitting the subject document for information or approval; and</p> <p>(b) provide details of the consultation undertaken including:</p> <p>(i) the outcome of that consultation, matters resolved and unresolved; and</p> <p>(ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p>	<p>This condition requires for consultation triggered by the consent to be undertaken prior to submission of the document for approval. Such consultation is required under sub-clauses:</p> <ul style="list-style-type: none"> <li>• C5(a) (Pre-Construction Dilapidation Survey Report)</li> <li>• C16(b) (Construction Pedestrian and Traffic Management Sub Plan)</li> <li>• C18(a) (Construction Soil and Water Management Plan)</li> </ul> <p>Consultation with asset owners under condition C5(a) was in progress for substage 4 at the time of this IEA.</p> <p>Consultation required under C16(b) and C18(a) was identified as a NC in the initial 2022 IEA. Evidence had not been sought as substages 1 - 3 were complete at the time of this IEA and</p>	<p>Prior to the commencement of sub-stage 4 provide management plans as required under conditions A19, C5(a), C16(b) and C18(a) to the relevant stakeholders for comment.</p> <p>Document consultation with relevant stakeholders and update the management plans accordingly.</p> <p>Provide the updated management plans to the Planning Secretary including records of completed consultation.</p>	<p>No action undertaken for sub-stages 1 -3 as works were complete at the time of this IEA and new management plans / reports for each future sub-stage will be developed.</p> <p>Prior to the commencement of sub-stage 4 the Principal will undertake consultation in accordance with the requirements of condition A19, specifically:</p> <ul style="list-style-type: none"> <li>• Consultation is currently in progress for impacted asset owners regarding pre-construction dilapidation</li> <li>• The Construction Pedestrian and Traffic Management Plan (CPTMP) will be provided to</li> </ul>	04/01/2024

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
	<p><b>C16(b) Construction Environmental Management Plan</b>            A 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:            (a) be prepared by a suitably qualified and experienced person(s);            (b) be prepared in consultation with Council and TfNSW;            (c) include details of predicted number of construction vehicle movements per day and detail of vehicle types, noting that vehicle movements are to be minimised during peak periods;            (d) include assessment of potential impacts to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works;            (e) include details of any cumulative impacts due to ongoing construction works on nearby sites;            (f) include 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.            (g) detail heavy vehicle routes, access and parking arrangements; (h) detail construction vehicle access</p>	<p>future stages will require new management plans.</p> <p>Sub-condition C16(b) was identified as a NC in the initial 2022 IEA.</p> <p>Sub-condition C16(a) requires the CTPMSP to be prepared in consultation with Council and TfNSW, however no evidence of consultation was provided during this IEA.</p> <p>Substage 1 -3 were complete prior to the initial 2022 IEA being issued to the Planning Secretary, therefore the CTPMSP was not updated retrospectively.</p>		<p>Council and TfNSW for comment</p> <ul style="list-style-type: none"> <li>The Construction Soil and Water Management Plan (CSWMP) will be provided to Council for comment</li> <li>The updated CPTMP and CSWMP will be provided to the Planning Secretary including records of completed consultation</li> </ul>	

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
	<p>arrangements and student/ staff access to the site during construction works to ensure safe operation of the school at all times; and</p> <p>(i) no existing trees are to be removed to facilitate construction works that are not included in the list of trees permitted to be removed as part of this consent.</p> <p><b>C18(a) Construction Environmental Management Plan</b>            The Applicant must prepare a Construction Soil and Water Management Plan (CSWMP) and the plan must address, but not be limited to the following:</p> <p>(a) be prepared by a suitably qualified expert, in consultation with Council;</p> <p>(b) describe all erosion and sediment controls to be implemented during construction, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils &amp; Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book';</p> <p>(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);</p> <p>(d) detail all off-Site flows from the Site; and</p> <p>(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.</p>	<p>Sub-condition C18(a) was identified as a NC in the initial 2022 IEA.</p> <p>Sub-condition C18(a) requires the CSWMP to be prepared in consultation with Council, however no evidence of consultation was provided during this IEA.</p> <p>Substage 1 -3 were complete prior to the initial 2022 IEA being issued to the Planning Secretary, therefore the CSWMP was not updated retrospectively.</p>			

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
NC-02	<p><b>A36 Revision of Strategies, Plans and Programs</b>            Within three months of:            (a) the submission of a compliance report under Schedule 3 condition A38;            (b) the submission of an incident report under Schedule 3 condition A32;            (c) the submission of an Independent Audit under Schedule 3 condition D37;            (d) the approval of any modification of the conditions of this consent; or            (e) the issue of a direction of the Planning Secretary under Schedule 3 condition A2 which requires a review            The strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.</p>	<p>The initial IEA was undertaken between June and July 2022, with the IEA report submitted to the Planning Secretary in October 2022. Subsequently the Planning Secretary requested additional information be provided in relation to the IEA (dated 17/02/2023 and 21/03/2023). All items were addressed, and a final report was submitted and accepted by the Department in March 2023. The requirement to undertake a review of the strategies, plans and programs required under this consent within 3 months of A36(c) the submission of an Independent Audit under Schedule 3 condition D37 did not occur as works for substage 1 - 3 were complete prior to the submission of the initial 2022 IEA Report.</p>	<p>All relevant strategies, plans and programs required under this consent to be reviewed (where relevant) and the Planning Secretary and the Certifier to be notified in writing in accordance with the requirements of this condition.</p>	<p>No action undertaken for sub-stages 1 -3 as works were complete at the time of this IEA.             The Principal will ensure all relevant strategies, plans and programs required under this consent for substage 4 will be reviewed, and the Planning Secretary and the Certifier will be notified in writing that a review is being carried out in accordance with the requirements of this condition.</p>	<p>As required by this condition</p>
NC-03	<p><b>A38 Compliance Reporting</b>            Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).</p> <p><b>A39 Compliance Reporting</b>            Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.</p>	<p>Table 1 of the Independent Audit Post Approval Requirements (2020) requires the initial IEA be undertaken within 12 weeks of the commencement of construction and then at intervals no greater than 26 weeks from the date of the initial independent audit.</p> <p>The initial 2022 IEA was undertaken 16 June 2022 (was due in March 2022), with the IEA report submitted to DPE 10 November 2022. This IEA was due to be undertaken in December 2022, however it was completed in March 2023, outside the timelines prescribed in the Independent Audit Post Approval Requirements (2020).</p>	<p>All future IEA's to be undertaken in accordance with the Compliance Reporting Post Approval Requirements (2020) and IEA reports to be submitted to the planning Secretary within the specified timeframe.</p>	<p>The Principal will ensure all future IEA's are undertaken in accordance with the guideline and the IEA reports are submitted to the Department within the specified timeframe.</p>	<p>As required by this condition</p>

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
NC-04	<b>C4, Photographic Archival Recording</b> Prior to any demolition and/or alteration works commencing on the site in Stage 1 on the site, archival photographic recordings must be undertaken for significant building fabric and spaces, as specified by a qualified heritage consultant. The archival recordings must specifically include a detailed account of internal and external components of the buildings / spaces and context photographs of the existing site as viewed from the street and its surroundings. A copy of the final recordings must be submitted to the Certifier and Council for information.	'The majority of the requirements of this conditions were complied with for substage 1 - 3, however a copy of the final recordings was not submitted to Council.	Provide archival recordings to Council for information as required by this condition.	Prior to sub-stage 4, the archival recordings will be provided to Council for information as required by Condition C4.	04/01/2024
NC-05	<b>C13, Environmental Management Plan Requirements</b> Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (OPIE April 2020).	A review of the CEMP and subplans addressed most of the requirements in the Environmental Management Plan Guideline, however there were several elements that were not addressed.  Substages 1 - 3 were complete prior to the final 2022 IEA being submitted to the Planning Secretary, therefore the plans were not amended retrospectively.  The Auditee confirmed that substage 4 was yet to be commence and stated that the requirements of this condition will be forwarded to the awarded construction contractors.	The CEMP, and relevant sub-plans for sub-stage4 to address the requirements of the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> .	No action undertaken for sub-stages 1 -3 as works were complete at the time of this IEA.  In the scoping of sub-stage 4, the Principal will ensure the construction contractor is informed of the requirements of this condition.	04/01/2024
NC-06	<b>D9 Implementation of Management Plans</b> The Applicant must carry out the construction of the development in	The initial 2022 IEA identified NC's for the Implementation of the CEMP and associated sub-plans:	Ensure the management measures implemented onsite are in accordance with the	No action undertaken for substages 1 -3 as works were complete at the time of this IEA.	04/01/2024



Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
	accordance with the most recent version of the submitted CEMP (including Sub-Plans).	<ul style="list-style-type: none"> <li>One element of the CSWMP not implemented</li> <li>One element of the CPTMP not implemented</li> <li>Two elements of the CNVMP not implemented</li> </ul> <p>Sub-stage 1 - 3 were complete at the time of the submission of the initial 2022 IEA to the Planning Secretary, therefore the relevant management plans did not undergo a review and update, nor did confirmation the required updates were implemented on site.</p>	<p>commitments made in the CEMP and sub-plans:</p> <ul style="list-style-type: none"> <li>The Contractor's waste register is to identify the fate (i.e. reused, recycled, stockpiled or disposed) of the waste material leaving site for substage 4.</li> </ul>	In the scoping of sub-stage 4, the Principal will ensure the construction contractor is informed of the requirement to maintain a waste register that identifies the fate (i.e. reused, recycled, stockpiled or disposed) of the waste material leaving site.	
	<p><b>D32 Waste Storage and Processing</b> The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.</p>	An up to date register identified segregated waste that was collected and transported off-site was provided during the IEA. It is not clear from reviewing the waste register what was earmarked for re-use or recycling			
NC-09	<p><b>D38 Independent Environmental Audit</b> Independent Audits of the development must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i>.</p>	<p>The method for the initial 2022 IEA undertaken by Epic Environmental was developed and executed generally in accordance with the Independent Audit Post Approval Requirements (2020). In accordance with Table 1 of the Independent Audit Post Approval Requirements (2020), the initial IEA is required to be undertaken within 12 weeks of the commencement of construction (14 March 2022), however it was undertaken 16 June 2022 and therefore after the deadline prescribed</p>	All future IEAs are to be undertaken in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> .	All future IEAs will be undertaken in accordance with the requirements of the <i>Independent Audit Post Approval Requirements (2020)</i> .	As per the guideline

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
		in Table 1 of the Independent Audit Post Approval Requirements (2020).			
NC-10	<p><b>D40 Independent Environmental Audit</b> In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must:</p> <p>(a) review and respond to each Independent Audit Report prepared under Schedule 3 condition D38 of this consent;</p> <p>(b) submit the response to the Planning Secretary and the Certifier; and</p> <p>(c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary.</p>	<p>The initial 2022 IEA Report was submitted to the Planning Secretary, however no evidence of it being submitted to the certifier was obtained during this IEA.</p> <p>The initial 2022 IEA Report was not made publicly available within 60 days after submission to the Planning Secretary (submitted October 2022)</p> <p>Note: the Planning Secretary requested additional information in February and March 2023. Based on these dates, the IEA is to be made publicly available in May 2023.</p> <p>This IEA is to be made publicly available in July 2023.</p>	<p>All future IEAs are to:</p> <ul style="list-style-type: none"> <li>Review and respond to audit findings for each IEA undertaken</li> <li>Submit response to the Planning Secretary and the Certifier</li> <li>Publish each IEA on the Applicant's website within 60 days of the submission of the IEA.</li> </ul>	All future IEAs will be undertaken in accordance with the specific requirements of this condition.	As per the guideline
NC-11	<p><b>D41 Independent Environmental Audit</b> 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 Requirements (2020), unless otherwise agreed by the Planning Secretary.</p>	<p>The initial 2022 IEA Report was submitted to the Planning Secretary outside of the required timeframe prescribed in the Independent Audit Post Approval Requirements (2020).</p>	<p>Submit all future IEA Reports in accordance with the schedule outlined in Table 1 of the <i>Independent Audit Post Approval Requirements (2020)</i>.</p>	The Principal will submit this IEA and all future audit reports to the Planning Secretary within the required timeframe.	As per the guideline

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
<b>CEMP and subplans</b>					
NC-06	<p><b>CWMSP, s8.2 Waste Management Register</b> A waste management register (Appendix A) will be maintained and include the following information:</p> <ul style="list-style-type: none"> <li>Type of waste and its classification (according to the POEO Act and Waste Classification Guidelines)</li> <li>Quantities of waste, measured in tonnes</li> <li>How and where the waste was reused, recycled, stockpiled, or disposed of</li> <li>Date when the waste was reused, recycled, stockpiled, or disposed of; and</li> <li>Name and waste transport licence (if applicable) of the transporter used</li> </ul> <p>Waste information will include details of the date waste was reused, recycled, stockpiled or disposed, quantity and disposal location.</p>	<p>The clause within the CWMSP required that the Applicant record how and where waste material is reused, recycled, stockpiled and disposed of. While the destination, transporter and date of material leaving the site was documented, the waste disposal register did not describe the ultimate fate of the material leaving the site (i.e. reused, recycled, stockpiled or disposed).</p> <p>Note: Sub-stages 1 - 3 were completed at the time of this audit, therefore the actions identified in the initial 2022 IEA to address the NC were not implemented retrospectively.</p>	<p>The waste register for sub-stage 4 is to include a column identifying the fate (i.e. reused, recycled, stockpiled, or disposed) of the waste material leaving site.</p>	<p>No action undertaken for substages 1 -3 as works were complete at the time of this IEA.</p> <p>In the scoping of sub-stage 4, the Principal will ensure the construction contractor is informed of the requirement to maintain a waste register that identifies:</p> <ul style="list-style-type: none"> <li>Type of waste</li> <li>Quantities of waste</li> <li>Fate (i.e. reused, recycled, stockpiled or disposed) of the waste material leaving site</li> <li>Date and when the waste was reused, recycled, stockpiled or disposed of</li> <li>Name and waste transport licence of transporter used</li> </ul>	04/01/2024
NC-07	<p><b>CPTMP, s4.17. Spoil Management</b> To ensure that soil/excavated material is not transported on wheels or tracks of vehicles or plant and deposited on surrounding roadways, wheel wash station will be positioned at the entry/exit point.</p>	<p>The clause in the CPTMP required a wheel wash station to be located at the entry / exit point at the time of the site inspection.</p> <p>This was identified as a NC in the initial 2022 IEA, however sub-stages 1 - 3 were complete at the time of this IEA, therefore the action was not implemented retrospectively.</p> <p>Observations made during the site inspection for this IEA confirmed that</p>	<p>Ensure the management measures implemented onsite are in accordance with the commitments made in the CEMP and sub-plans</p>	<p>No action undertaken for substages 1 -3 as works were complete at the time of this IEA.</p> <ul style="list-style-type: none"> <li>Prior to the commencement of and during construction of sub-stage 4, confirm the mitigation measures implemented on site reflect the commitments made in the CPTMP</li> </ul>	04/01/2024

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
		there was no evidence of soil tracked onto Mount Pleasant Avenue.			
NC-08 <sup>1</sup>	<p><b>CNVMP, s11.3.1 Environmental Management Review</b>            The effectiveness and proper implementation of the Plan will be reviewed by the Cowyn Building Group in consultation with the appointed site supervisor(s) and the Cowyn Building Groups acoustic consultant or other advisors as required at a minimum of every six months or sooner as necessary during the course of the project.            The review will comprise:</p> <ul style="list-style-type: none"> <li>• Reviewing the results of any noise monitoring required by this Plan</li> <li>• Reviewing any complaints received, and the outcomes of associated investigations, corrective actions, and responses as required by this Plan</li> <li>• Reviewing any other relevant issues.</li> </ul>	<p>This clause in the CNVMP requires an environmental management review with Cowyn and the acoustic consultant (or adviser) be undertaken every 6 months.</p> <p>No evidence of an environmental management review being undertaken within 6 months of the project commencing was observed.</p> <p>Sub-stages 1 - 3 were complete prior to this IEA, therefore the action to address the NC identified in the initial 2022 IEA was not implemented retrospectively.</p>	<p>he CNVMP for sub-stage 4 – 6 is to outline an appropriate schedule for the:</p> <ul style="list-style-type: none"> <li>• Review and update of the management plan</li> <li>• Review of noise monitoring</li> <li>• Persons to be involved in the reviews</li> <li>• Review the adequacy of the plan</li> </ul>	<p>No action undertaken for sub-stages 1 -3 as works were complete at the time of this IEA. The CNVMP for sub-stage 4 will include a schedule for the review and update of the plan and review of monitoring required.</p> <p>The Principal will ensure that reviews will be undertaken and documented in accordance with the plan.</p>	04/01/2024

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
	<p><b>s11.3.2, Continuous Improvement</b> Continual improvement of this Plan, as required, will be achieved by the regular evaluation of noise and vibration management performance against objectives and targets for the purpose of identifying opportunities for improvement. The continual improvement process will, on a minimum six-monthly basis:</p> <ul style="list-style-type: none"> <li>• Review the adequacy of this Plan</li> <li>• Consider any recent developments in practices and technology to ensure best management practices are followed to minimise noise impacts.</li> </ul> <p>On a minimum quarterly basis: Review noise monitoring results and identify areas of opportunity for improvement of noise management which can contribute in a practical and cost-effective way to improved performance.</p>	<p>This clause in the CNVMP requires a review and continual improvement of the plan every 6 months and a review of noise monitoring every 3 months. No evidence of a review or update of the plan was observed in the 6 months since the plan was completed.</p> <p>Substages 1 - 3 were complete prior to this IEA, therefore the action to address the NC identified in the initial 2022 IEA was not implemented retrospectively.</p>			

<sup>1</sup> Two separate non-conformances against the CVNMP were both related to management review and continuous improvement, resulting in the same recommended action, therefore they have been given the same unique identifier

## 4.2 Opportunities for Improvement

Substages 1 – 3 were complete at the time of this IEA, with substage 4 construction works yet to commence. There were no opportunities identified beyond those identified in the initial IEA. The four opportunities for improvement (OFI) identified during the initial 2022 IEA were provided as actions. It was confirmed in this IEA that the actions outlined in **Table 11** had not been implemented at the time of this IEA.

The complete action plan, including consideration by the Applicant has been provided in **Appendix F**.

**Table 11. Recommended Actions for Opportunities for Improvement**

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
<b>Development Consent</b>					
OFI-01	<b>D16:</b> Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC 2006) (as may be updated or replaced from time to time).	The CVMP for substage 1 - 3 references noise limits sourced from the NSW Industrial Noise Policy, Noise Policy for Industry (2017), which is different to the standards prescribed in the condition. The Auditee confirmed that no vibration monitoring was been triggered by the scope of works. The Auditee confirmed that this will be addressed for substage 4 prior to work commencing	The CNVMP for sub-stage 4 is to address the criteria as prescribed by this condition.	No action undertaken for substages 1 -3 as works were complete at the time of this IEA.  The Principal will ensure the construction contractor is informed of the requirements of this condition and that the detail is to be included in the CVNMP.	04/01/2024
OFI-02	<b>D32:</b> The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling, and disposal locations for the duration of construction.	An up to date register identified segregated waste that was collected and transported off-site was provided during the IEA. It is not clear from reviewing the waste register what was is earmarked for re-use or recycling	<b>As per NC-06:</b> The Contractor’s waste register is to identify the fate (i.e. reused, recycled, stockpiled or disposed) of the waste material leaving site for sub-stage4.	No action undertaken for substages 1 -3 as works were complete at the time of this IEA.  In the scoping of sub-stage 4, the principal will ensure the Contractor is informed of the requirement to maintain a waste register that identifies	04/01/2024

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
				the fate (i.e. reused, recycled, stockpiled or disposed) of the waste material leaving site.	
<b>CEMP and subplans</b>					
OFI-03	<b>CWMSP, s1.2 Environmental Management Systems Overview</b> EWMS will be developed and signed off by environment and management representatives prior to associated works and construction personnel will be required to undertake works in accordance with the identified mitigation and management measures.	No documented evidence that supported the approval of the document was observed, however substages 1 - 3 were complete at the time of this IEA. The Auditee confirmed that this will be addressed in the CWMSP to be developed for substage 4.	A document control sheet is to be included on the cover page of all management plans requiring a document approver to initial and approve the final revision of the document.	Sub-stage 1 - 3 have been completed and action is no longer applicable. This will be taken as a note for the Principals review of documentation prepared by future contractors.	04/01/2024
OFI-04	<b>CWMSP, s7.4 Monitoring and Inspection</b> Regular waste monitoring and inspections will be undertaken during construction. These include: <ul style="list-style-type: none"> <li>Weekly Environmental Inspections that includes waste management</li> <li>As required document and record the types and volumes of wastes generated, reused, recycled, and disposed of</li> <li>As required document and record the locations of stockpiled and stored waste</li> <li>Update the Waste Management Register monthly of all waste collected for disposal and/or recycling until final completion in accordance with the RMS G36 specification</li> </ul>	Monitoring and inspection records observed during the IEA included those listed in the CWMSP. A monthly report from the waste contractor was not observed during the IEA.	A monthly waste report to be provided for substage, that includes the following detail for waste removed offsite (for the previous month): <ul style="list-style-type: none"> <li>Type of waste</li> <li>Volume/quantity of each waste type</li> <li>Destination and fate of waste (e.g. landfill, recycled, reused etc)</li> </ul>	No action undertaken for substages 1 -3 as works were complete at the time of this IEA. For sub-stage 4, The Principal will request the waste contractor provide a monthly report that includes the following detail for waste removed offsite (for the previous month): <ul style="list-style-type: none"> <li>Type of waste</li> <li>Volume/quantity of each waste type</li> <li>Destination and fate of waste (e.g. landfill, recycled, reused etc)</li> </ul>	04/01/2024

Unique Identification	Relevant Condition / Section	Audit Finding	Recommended Actions	Proponents Proposed Action	Due Date
	<ul style="list-style-type: none"> <li>• Compile and record monthly resource usage during construction works (e.g. energy, water, fuel, oil, etc</li> <li>• As required record any results of any soil, surface, or groundwater sampling</li> <li>• The Waste Contractors are to maintain and document the types and volumes of wastes collected recycled and disposed of. They are to provide monthly reports on waste removal and disposal activities to Cowyn Building Group.</li> </ul>				



## 5 CONCLUSION

This document outlines the method, findings, and recommended actions of the 2022 IEA undertaken by Epic at the site. The IEA was undertaken in accordance with Condition 37 and 38 of the State Significant Development Consent (SSD8996). The IEA was conducted to:

- Assess the level of compliance against the conditions of approval
- Assess whether current practices and standards are being implemented
- Evaluation of the overall environmental performance of the site
- Assess the adequacy and implementation of management plans
- Identify recommended actions for the overall improvement of environmental performance

The IEA was undertaken between 16 March 2023 and 28 April 2023 and captured evidence for the period June 2022 to April 2023. The IEA criteria used for the IEA, Conditions of SSD8996, the CEMP, and the associated sub-plans. The Applicant demonstrated compliance against **91%** of the IEA criteria, this comprised of a total of twelve non-compliances.

- Based on Table 1 of the *Independent Audit Post Approval Requirements (2020)*:
  - The initial IEA was due on 14 March 2022; however it was undertaken 16 June 2022 - therefore was after the deadline prescribed under the *Independent Audit Post Approval Requirements (2020)*
  - The IEA report was submitted outside of the required timeframes as outlined in Table 1 (from the date the site inspection occurred)
  - In accordance with the required schedule, this IEA was due to be undertaken in December 2022, however it was undertaken in March 2023 and therefore was after the deadline prescribed under the *Independent Audit Post Approval Requirements (2020)*
- The required consultation with relevant parties for the following could not be verified:
  - Preparation of the Construction Pedestrian and Traffic Management Plan (CPTMP) and the Construction Soil and Water Management Plan (CSWMP)
  - Implementation of the traffic management measures (as recommended in the Road Safety Audit) with Council and or the Planning Secretary
- No evidence of the archival records being provided to Council
- The Construction Environment Management Plan (CEMP) and some associated sub-plans did not meet the minimum requirements of the *Environmental Management Plan Guideline: Guideline for Infrastructure Projects*
  - Some elements of the CSWMP, CPTMP and the Construction Noise and Vibration Management Plan (CNVMP) had not been implemented during construction of substages 1 – 3
  - A review of the CNVMP every six months by the contractor and the acoustic consultant had not occurred
  - Noise monitoring had not occurred to date as required by the commitment outlined in the CNVMP
- The waste disposal register did not describe the ultimate fate of material leaving the site

Recommended actions to assist the Applicant in addressing the findings of this IEA have been provided. The Applicant has considered these actions and prepared an action plan to address the matters identified as part of the IEA. Implementation of the action plan should be verified as part of the subsequent IEA.

Finally, the IEA team would like to thank all the IEA participants for their time, assistance, and cooperation in undertaking this audit.

## 6 REFERENCES

Department of Infrastructure, Planning and Natural Resources, 2004, *Environmental Management Plan Guideline: Guideline for Infrastructure Projects*, Sydney, New South Wales

Department of Planning, Industry and the Environment, 2020, *Requirement 2, Independent Audit - Post Approval Requirements*, Sydney, New South Wales

International Organization for Standardization, 2018, *ISO 19011:2018 Guidelines For Auditing Management Systems*

## 7 LIMITATIONS AND DISCLAIMER

Epic Environmental Pty Ltd (Epic) has prepared the following report for the exclusive benefit of Carmichael Tompkins Property Group (Client) and for the singular purpose of detailing the findings of the 2022 Independent Environmental Audit at Normanhurst, NSW at Normanhurst, NSW. All interpretations, findings or recommendations outlined in this report should be read and relied upon only in the context of the report as a whole.

The following report cannot be relied upon for any other purpose, at any other location or for the benefit of any other person, without the prior written consent of Epic. Except with Epic's prior written consent, this report may not be:

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- a. presumed the accuracy of the information provided by the Client (including its representatives)
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- c. has not undertaken any independent investigations or enquiries outside the scope of works with respect to information provided for this report
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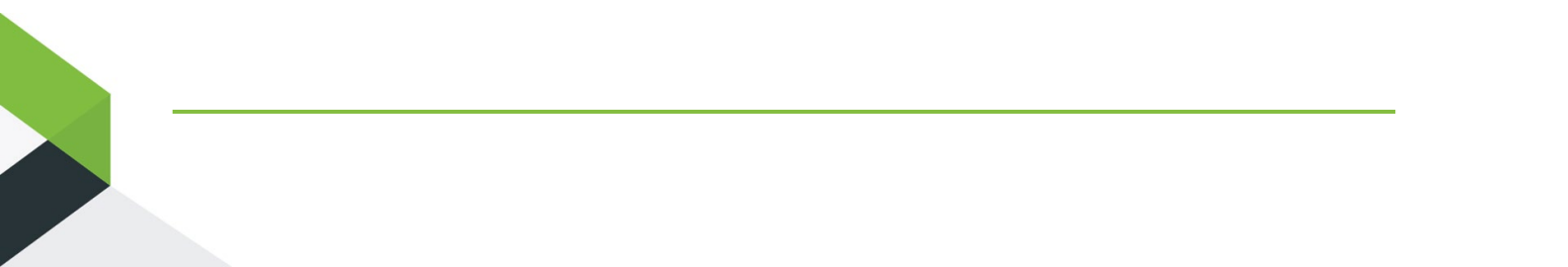
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**APPENDIX A PLANNING SECRETARY IEA TEAM APPROVAL**



Mr Luke Gladswish  
Carmichael Tomkins Property Group Pty Ltd  
Level 14  
88 Phillip Street  
Sydney NSW 2000

1 March 2023

BY EMAIL ONLY: [luke.gladswish@ctpg.com.au](mailto:luke.gladswish@ctpg.com.au)

Dear Mr Gladswish

### **Loreto Normanhurst School Redevelopment (SSD 8696)**

#### **Auditor Approval 2023**

I refer to your request (SSD-8696-PA-42) for the Secretary's approval of suitably qualified persons to prepare the 2023 Independent Environmental Audit (**IEA**) for the Loreto Normanhurst School Redevelopment (SSD 8696).

The Department of Planning and Environment (the **department**) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced.

In accordance with Part D, Condition D37 of SSD-8696 (**consent**) and the 2020 Independent Audit Post Approval Requirements, as nominee of the Planning Secretary, I agree to the appointment of the following audit team from Epic Environmental Pty Ltd:

- Ms Kirsty Douglas as lead auditor;
- Mr Chris Griffiths as auditing assistant; and
- Mr Romin Nejad as audit support and technical reviewer.

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

The Independent Audit must be prepared, undertaken and finalised in accordance with the 2020 Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Department of Planning and Environment



Should you wish to discuss the matter further, please contact Laura Papoulias on 02 8289 6879 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read "Julia Pope".

**Julia Pope**  
**Team Leader Compliance Metro**

*As nominee of the Planning Secretary*

**APPENDIX B INDEPENDENT AUDITOR DECLARATION FORM**



# Memo

<b>To:</b> Carmichael Tompkins Property Group	<b>From:</b> Kirsty Douglas	<b>Attention:</b> Planning Secretary
<b>Project name:</b> Loreto Normanhurst School Redevelopment - Independent Environmental Audit		
<b>Project number:</b> SAA220009.01	<b>Date:</b> 15 May 2023	
<b>Subject:</b> Independent Audit Report Declaration (post audit)		

<b>Project Number</b>	Loreto Normanhurst School Redevelopment - Independent Environmental Audit
<b>Consent Number</b>	SD 8996
<b>Description of Project</b>	Loreto Normanhurst School Redevelopment - construction phase for the building works to be carried out under stage 1.
<b>Project Address</b>	91-93 Pennant Hills Road, Normanhurst NSW 2076
<b>Proponent</b>	Carmichael Tompkins Property Group
<b>Title of Audit</b>	Independent Environmental Audit
<b>Date</b>	15/05/2023

Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. 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
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

## Notes:

- a. Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and



- b. The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

<b>Name of Auditor</b>	Kirsty Douglas
<b>Signature</b>	
<b>Qualification</b>	Lead Auditor (Exemplar Global, No. 210439), BEnvSci, Cert IAP2 Australasia (Engagement)
<b>Company</b>	Epic Environmental Pty Ltd
<b>Company Address</b>	Suite 5, Level 9, 189 Kent Street, Sydney, NSW, 2000

# Memo

<b>To:</b> Carmichael Tompkins Property Group	<b>From:</b> Kirsty Douglas	<b>Attention:</b> Planning Secretary
<b>Project name:</b> Loreto Normanhurst School Redevelopment - Independent Environmental Audit		
<b>Project number:</b> SAA220009.01	<b>Date:</b> 15 May 2023	
<b>Subject:</b> Independent Audit Report Declaration (post audit)		

<b>Project Number</b>	Loreto Normanhurst School Redevelopment - Independent Environmental Audit
<b>Consent Number</b>	SD 8996
<b>Description of Project</b>	Loreto Normanhurst School Redevelopment - construction phase for the building works to be carried out under stage 1.
<b>Project Address</b>	91-93 Pennant Hills Road, Normanhurst NSW 2076
<b>Proponent</b>	Carmichael Tompkins Property Group
<b>Title of Audit</b>	Independent Environmental Audit
<b>Date</b>	15/05/2023

Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements (Department 2019)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. 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
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

## Notes:

- a. Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

- b. The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor	Chris Griffiths
Signature	<i>Chris Griffiths</i>
Qualification	Lead Auditor (BSI Training Academy), BSci (Environmental Management)
Company	Epic Environmental Pty Ltd
Company Address	Suite 5, Level 9, 189 Kent Street, Sydney, NSW, 2000

**APPENDIX C IEA PLAN**





## **Independent Environmental Audit Plan**

**CTPG**

**Redevelopment of the Loreto Normanhurst Secondary School**

**Normanhurst, NSW**

**SAA220009.01**

**24 February 2023**

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## DOCUMENT CONTROL

Revision	Revision date	Revision details	Author	Editorial review	Technical review	Approver
A	21/02/2023	Draft for Internal Review	KD	CG	CG	CG

## DISTRIBUTION

Revision	Revision date	Issued to
0	3/03/2023	CTPG

## DOCUMENT INFORMATION

<b>Printed:</b>	29 May 2023
<b>Last saved:</b>	29 May 2023 12:46 PM
<b>File name:</b>	SAA220009.01-PLN-CTPG-Loreto-IEA Plan
<b>Author:</b>	Kirsty Douglas
<b>Project manager:</b>	Chris Griffiths
<b>Client:</b>	CTPG
<b>Document title:</b>	Independent Environmental Audit Plan
<b>Project number:</b>	SAA220009.01



## 1 INTRODUCTION

Epic Environmental Pty Ltd (Epic) has been engaged by Carmichael Tompkins Property Group (CTPG) to undertake an Independent Environmental Audit (IEA) for stage 1 of the construction works at the Loreto Normanhurst School (the site):

- Post-construction – substages 2 and 3
- Pre-construction – substage 4

This document provides a detailed IEA plan to guide the execution and reporting of the IEA. The IEA plan should be reviewed by CTPG and issued to relevant auditees prior to the execution of the IEA.

### 1.1 Purpose

As per Clauses D38 of the State Significant Development (SSD) 8996 consent, an IEA is required to be conducted in accordance with the Department of Planning and Environment 's *Independent Audit Post Approval Requirements (2020)*.

This IEA has been undertaken to address Clauses D37 to D42 and evaluate compliance with the SSD consent conditions.

### 1.2 Scope

The IEA scope will include activities undertaken at the site, in relation to the Stage 1 construction works for the redevelopment of the Loreto Normanhurst School, Normanhurst NSW.

### 1.3 Objectives

The key objectives of the IEA are to:

- Assess whether the project is being undertaken from an environmental point of view in accordance with best practice, standards, and legislative requirements
- Assess the overall environmental performance of the project on the surrounding environment and sensitive receptors
- Review the implementation of environmental management plans developed in accordance with the conditions of consent
- Provide recommendations for the overall improvement of environmental performance of the project

### 1.4 IEA Criteria

The IEA criteria are the requirements which the site will be assessed against. The IEA criteria for the site will be as follows:

- Conditions of SSD 8996: Schedule 3 Parts A- E
- Community Consultation Plan (CCP)
- Construction Environmental Management Plan (CEMP)
- Construction Pedestrian and Traffic Management Plan (PTMP)
- Construction Noise and Vibration Management Plan (NVMP)
- Construction Soil and Water Management Plan (SWMP)
- Construction Waste Management Sub-plan (WMP)

## 2 IEA PLANNING

### 2.1 IEA Team

The IEA team members have been provided in **Table 1**. In accordance with Condition D37 of the SSD consent, an approval for the appointment of independent audit team for the IEA has been granted by the Department of Planning and Environment (01/03/2023).

**Table 1. IEA Team**

Person	Role	Years' Experience	Qualification
Kirsty Douglas	Lead Auditor	17	Lead Auditor (Exemplar Global, No. 210439), BEnvSci (Conservation Biology and Ecology), GCert IAP2 Australasia
Chris Griffiths	Auditing Assistant	16	Lead Auditor (BSI Training Centre), DSci (Environmental Management)
Romin Nejad	Audit Support and Technical Reviewer	17	Lead auditor (Exemplar Global, No. 115361), BEng (Env), GCert Env Mgmt, GCert Carbon Mgmt, MBA

### 2.2 CTPG Staff Participation Requirements

#### 2.2.1 CTPG IEA Representative

Luke Gladwish will act as the CTPG IEA representative during the completion of this IEA. Luke will be responsible for organising meeting times, interview attendees and site inspection times.

#### 2.2.2 Opening Meeting

The opening meeting will be held on site on site. The meeting will be facilitated by the IEA team and will be attended by select CTPG personnel. CTPG's IEA representative will be responsible for organising suitable time for undertaking the opening meeting.

#### 2.2.3 Interviews

A number of key staff will be required to be interviewed during the IEA. The team members that may interviewed for the IEA will include:

- Managing Director
- Site Manager
- HSE Representative
- Leading Hand

Interviews will be held both on site and via teleconference. A separate interview session will be scheduled with each interviewee. The CTPG IEA representative will be responsible for organising suitable times for undertaking the IEA interviews.

#### 2.2.4 Site Inspection

Following the IEA interviews, a site inspection will be undertaken by Epic to visually verify compliance of certain conditions. The CTPG IEA representative will liaise with relevant parties to obtain access and ensure persons are available to escort the IEA team around relevant areas of the site.

#### 2.2.5 Closing Meeting

The closing meeting will be held via teleconference after the site inspection and interviews are complete. The meeting will be facilitated by the IEA team and should be attended by all CTPG interviewees. The CTPG IEA representative will be responsible for organising suitable time for undertaking the closing meeting.

## 2.3 IEA Program

The proposed program to execute the IEA will be as detailed in **Table 2**. Should the precise time/dates require amending, these can be accommodated through discussions with the Lead Auditor.

**Table 2. Proposed Program for the IEA**

Proposed Time	Proposed Date	Task / Description	Location	Who
<b>Phase I Project Preparations</b>				
17:00	06/03/2023	Provision of management plans required for the IEA	Email	CTPG
17:00	06/03/2023	Preparation and provision of IEA Plan to CTPG	Email	Epic
09:00 – 17:00	06/03/2023 – 10/03/2023	Undertake a preliminary document review	Epic Offices	Epic
09:00 – 17:00	10/03/2023	Develop the IEA tools	Epic Offices	Epic
<b>Phase II - IEA</b>				
09:00 – 09:30	24/02/2023	Opening Meeting	Site	All
09:30 – 12:00	14/03/2023	Site inspection	Site	Epic &
12:00 – 12:30	14/03/2023	Break	Site	Epic & CTPG
12:30 – 16:00	14/03/2023	IEA Interviews	Site	Epic & CTPG
9:00 – 11:30	16/03/2023	IEA Interviews and evidence collation (additional time allocated if required)	Teleconference	Epic & CTPG
11:30 – 12:00	16/03/2023	Closing Meeting	Teleconference	All
<b>Phase III – IEA Reporting</b>				
17:00	22/03/2023	Provision of additional evidence not obtained during the IEA.	Email	CTPG
09:00 – 17:00	22/03/2023 - 05/04/2023	Prepare the draft IEA report	Epic Offices	Epic
17:00	14/04/2023	Issue the draft IEA report to CTPG	Email	Epic
17:00	21/04/2023	CTPG provides comments on draft IEA report	Email	CTPG
17:00	28/04/2023	Issue the final IEA report to CTPG	Email	Epic

## 2.4 Communications Plan

All communications regarding the planning of the IEA, information requirements and IEA execution will be either by email or phone to the CTPG IEA representative.

### 3 IEA EXECUTION

The following IEA methodology has been prepared with reference to the Guideline: Independent Audit Post Approval Requirements (DPE, 2020).

#### 3.1 IEA Scoring Criteria

The proposed compliance assessment rating to be used in the IEA are outlined in **Table 3**.

**Table 3. IEA Scoring Criteria**

IEA Rating	Abbreviation	Definition
Compliant	C	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or management plan requirement have been complied with within the scope of the IEA.
Non-compliant	NC	The Auditor has determined that one or more specific elements of the conditions or management plan requirements have not been complied with within the scope of the IEA.
Not Triggered	NT	A condition or requirement has an activation or timing trigger that has not been met during the defined IEA period (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

#### 3.2 Develop Tools

The following tools will be utilised as part of the IEA program. These tools will assist in defining the scope of the IEA and will capture any issues identified during the IEA and allow discussion of potential recommendations on how these items can be rectified. The tools include:

- Opening meeting agenda and minutes
- Closing meeting agenda and minutes
- IEA checklist and interview questions

#### 3.3 Undertaking the IEA

##### 3.3.1 Document Review

With regards to the operations undertaken at the site, documentation provided by CTPG prior to the IEA, will be reviewed to determine preliminary findings. These findings will be clarified with the CTPG representatives during the IEA interviews (if required).

##### 3.3.2 Conduct an Opening Meeting

An opening meeting will be conducted at the start of the IEA. The opening meeting will:

- Introduce the IEA team
- Confirm the IEA objectives, scope, and criteria
- Confirm communications channels
- Outline the IEA process and schedule
- Identify and set expectations and requirements
- Address Health and Safety requirements and confidentiality

Meeting minutes will be maintained and issued by Epic following the meeting.

##### 3.3.3 Undertake Interviews

IEA interviews will be undertaken by the lead auditor, either in person or via teleconference. Questions delivered during the IEA interviews will be based on conditions or requirements applicable to the interviewees area of responsibility. The CTPG representative will be responsible for scheduling the IEA interviews with CTPG personnel.

If any items of non-compliance are identified during the interview, they will be raised with CTPG and noted in the report. If an item which poses a safety risk or risk of environmental harm, the CTPG representative will be notified immediately.

#### **3.3.4 Site Inspection**

A CTPG representative will be required to accompany the IEA team on the site inspection. Photographs and measurements (where appropriate) will be taken of items of interest or items requiring corrective action. If any items of non-compliance are identified, they will be raised with CTPG and noted in the report. If an item which poses a safety risk or risk of environmental harm, the CTPG representative will be notified immediately.

#### **3.3.5 Conduct the Closing Meeting**

A closing meeting will be conducted with CTPG at the end of the IEA. It will provide an opportunity for Epic to outline positive and negative findings identified during the IEA, CTPG to respond or clarify any findings, and Epic to confirm the process following the IEA. Meeting minutes will be maintained and issued by Epic following the meeting.

#### **3.3.6 IEA Findings**

The findings of the document review and interviews will be assessed, and each finding assigned a rating within the IEA checklist. Once complete the IEA checklist will be provided (in excel format) to CTPG for a review and response to each finding. Each CTPG response to a non-compliance must also specify actions and the completion timing of such actions that are to be taken in response to the non-compliance. For each opportunity for improvement CTPG must provide reasons if they propose not to implement any measures or make any changes in response.

### **3.4 Reporting**

Once the findings are assessed, rated, and reviewed, an independent IEA report will be prepared. The independent IEA report will include:

- Introduction, including
  - Background of the site
  - The IEA team
  - The objectives of the IEA
  - The IEA scope
  - The IEA period
- The IEA method, including
  - Development of IEA scope was developed
  - A summary of the IEA process adopted to determine the compliance status and assess
  - A list of the approvals and documents reviewed
  - Details of personnel interviewed including their name and position title
  - Details of site inspections undertaken
  - A summary of the consultation undertaken prior to the IEA
  - Meanings of compliance status descriptors used, as set out in this document
- The IEA findings, including
  - A summary of the assessment of compliance
  - Details of notices, orders, penalty notices or prosecutions issued in relation to the consent during the IEA period
  - Exception reporting of all non-compliances identified during the IEA period
  - A discussion of the status of actions arising from previous IEAs and the progress or outcomes of each action
- A discussion of whether the construction management plans, sub-plans and compliance documents are adequate and implemented

- A discussion of other matters considered relevant during the IEA
- A summary of complaints, and the adequacy of the response to, and management of complaints
- Details of any incidents and the adequacy of the response to, and management of such incidents
- An assessment of the compliance between actual and predicted impacts documented in environmental impact assessment
- Evidence collected through site inspections undertaken during the IEA
- Any continual environmental management improvement opportunities identified as part of the IEA
- Positive observations identified by the Auditor related to environmental management and performance
- Recommendations and opportunities for improvement
- The following appendices:
  - Complete IEA checklist including responses to findings
  - A copy of documentation from the Planning Secretary agreeing to the IEA Team
  - Documentation detailing consultation with the Department, and other agencies or stakeholders
  - Completed and signed Independent IEA Declaration Form
  - Site inspection photographs

## **4 GENERAL IEA MATTERS**

### **4.1 Logistical Arrangements for THE IEA**

Transport to and from the site will be organised by Epic. Teleconference arrangements will be organised by the CTPG representative.

### **4.2 General IEA Matters**

The IEA team will have completed any CTPG health and safety inductions on-site prior to undertaking the site inspection. The IEA team will be escorted at all times by a CTPG representative.

In accordance with the site requirements, the IEA team members will wear the following personal protective equipment (PPE):

- Long Pants
- Long sleeve shirt
- Steel cap work boots
- Hard Hat
- Protective eyewear

### **4.3 Matters Related to Confidentiality**

All information supplied, sighted, and disclosed as part of this IEA will remain confidential. Outcomes of the IEA will be provided to CTPG.

### **4.4 Auditors Code of Conduct**

All certified auditors have an obligation to improve the standing of their profession by observing the Exemplar Global Code of Conduct (the Code). Compliance with the Code is a condition of certification and all Auditors have signed an agreement to comply with the Code and are required to confirm that they have complied with the Code at each period of surveillance and re-certification.

#### **Code of Conduct**

- Auditors will act professionally, accurately and in an unbiased manner
- Auditors will strive to increase the competency and prestige of the profession
- Auditors will assist those in their employ or under their supervision in developing their professional competency
- Auditors will not undertake any assignments that they are not competent to perform
- Auditors will not represent conflicting or competing interests and will disclose to any client or employer any relationships that may influence their judgment
- Auditors will not discuss or disclose any information relating to any assignment unless required by law or authorised in writing by the client and/or their employing organization
- Auditors will not accept any inducement, commission, gift or any other benefit from client organisations, their employees or any interested party or knowingly allow colleagues to do so
- Auditors will not intentionally communicate false or misleading information that may compromise the integrity of any assignment or the personnel certification process
- Auditors will comply with Exemplar Global Certification Requirements, procedures and advisories which are relevant to their profession or certification
- Auditors will not act in any way that would prejudice the reputation of Exemplar Global or the personnel certification process and will cooperate fully with an enquiry in the event of any alleged breach of this code

## 4.5 Key Contacts

**Table 4. Key Contacts**

Name	Company and Position	Phone	Email
Luke Gladwish	CTPG Director and IEA Representative	0421 904 833	<a href="mailto:Luke.gladwish@ctpg.com.au">Luke.gladwish@ctpg.com.au</a>
Kirsty Douglas	Epic, Lead Auditor	0410 410 373	<a href="mailto:kdouglas@epicenvironmental.com.au">kdouglas@epicenvironmental.com.au</a>
Chris Griffiths	Epic, Auditing Assistant	0498 863 242	<a href="mailto:cgriffiths@epicenvironmental.com.au">cgriffiths@epicenvironmental.com.au</a>



## 5 LIMITATIONS AND DISCLAIMER

Epic Environmental Pty Ltd (Epic) has prepared the following report for the exclusive benefit of CTPG (Client) and for the singular purpose of documenting an IEA plan for the 2022 Independent Environmental Audit. All interpretations, findings or recommendations outlined in this report should be read and relied upon only in the context of the report as a whole.

The following report cannot be relied upon for any other purpose, at any other location or for the benefit of any other person, without the prior written consent of Epic. Except with Epic's prior written consent, this report may not be:

- a. released to any other person, whether in whole or in part;
- b. used or relied upon by any other party; or
- c. filed with any Governmental agency or other person or quoted or referred to in any public document.

This report has been prepared based on information provided by the Client and other parties. In preparing this report Epic:

- a. presumed the accuracy of the information provided by the Client (including its representatives);
- b. has not undertaken any verification to the accuracy or reliability included in this information (with the exception where such verification formed part of the scope of works);
- c. has not undertaken any independent investigations or enquiries outside the scope of works with respect to information provided for this report; and
- d. provides no warranty or guarantee, expressed or implied, as to the accuracy or reliability of the information provided in this report.

In recognition of the limited use of this report, the Client agrees that, to the maximum extent permitted by law, Epic (including its representatives and related entities) is not liable for any losses, claims, costs, expenses, damages (whether pursuant to statute, in contract or tort, for negligence or otherwise) suffered or incurred by the Client or any third party as a result of the information, findings, opinions, estimates, recommendations and conclusions provided in this report.

Without limiting the above, Epic (including its representatives and related entities) is not liable, in any way whatsoever:

- e. for the use or reliance of this report for any purpose other than that for which it has been prepared;
- f. for any use or reliance upon this report by any person other than the Client;
- g. where another person has a different interpretation of the same information contained in the report;
- h. for any consequential or indirect losses, or for loss of profit or goodwill or any loss or corruption of any data, database, or software.

If a section of this disclaimer is determined by any court or other competent authority to be unlawful and/or unenforceable, the other sections of this disclaimer continue in effect. Where further information becomes available, or additional assumptions need to be made, Epic reserves its right to amend this report, but is not obliged to do so.

## **6 REFERENCES**

NSW Government 2020, *Independent IEA Post Approval Requirements* (Department of Planning, Industry and Environment)

*AS/NZS ISO 19011:2019 - Guidelines for auditing management systems.*



## CONTACT US

🌐 [www.epicenvironmental.com.au](http://www.epicenvironmental.com.au)

☎ 1800 779 363

✉ [enquiries@epicenvironmental.com.au](mailto:enquiries@epicenvironmental.com.au)

<http://www.epicenvironmental.com.au/>

**APPENDIX D INDEPENDENT ENVIRONMENTAL AUDIT TABLE**





**CONFIDENTIAL**

## **Loreto Normanhurst School Redevelopment (Stage 1) – Independent Environmental Audit – Audit Table**

IEA Date: 16/03/2023

**Auditor:**

Kirsty Douglas

\_\_\_\_\_  
(Name)

A handwritten signature in black ink, appearing to read 'K. Douglas', is written over a horizontal line.

\_\_\_\_\_  
(Sign)

**Date**

updated 04/09/2023

### **Key for Compliance Assessment**

<b>Audit Rating</b>	<b>Definition</b>
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or OEMP requirement have been complied/conformed with within the scope of the audit.
Non Compliant	The auditor has determined that one or more specific elements of the conditions or OEMP requirements have not been complied/conformed with within the scope of the audit.
Not Triggered	A condition or requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance/conformance is not relevant.

<p style="text-align: center;"><b>Loreto Normanhurst School Redevelopment</b>  <b>Independent Environmental Audit</b>  Determination of a Development Application for State Significant, Development Consent (8996)</p>					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
<b>SCHEDULE 3 - CONDITIONS OF CONSENT FOR STAGE 1 WORKS</b>					
<b>Part A - Administrative Conditions</b>					
<b>Obligation to Minimise Harm to the Environment</b>					
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and, if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development.	C	1. Site Inspection (16/03/2023) 2. IEA interviews	Construction for substages 1-3 were complete at the time of the site inspection, and construction works for substage 4 had not commenced at the time of this IEA. Observations made during the site inspection confirmed that the site had been left in a stable condition: '- Landscaping was complete and was well maintained - There was no evidence of sediment build up in gutters or stormwater drains - There was no evidence of construction waste left on site Stage 4 works area: Observations made during the site inspection confirmed that reasonable and feasible performance measures had been implemented to prevent material harm to the environment by: - implementing erosion and sediment controls in accordance with the soil and water management plan and removing all waste offsite.	
<b>Terms of Consent</b>					
A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS, RtS and SRTS; and (d) in accordance with the approved plans in the table below (as may be amended by the conditions in Schedule 3 Part A)	C	1. Site Inspection (16/03/2023) 2. IEA interviews	There was no evidence of non-compliance with requirements (a) to (d) observed during the IEA, although it should be noted that construction for substage 1-3 was complete at the time of the audit and substage 4 constructing works had not commenced at the time of this IEA.	
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.	C	1. DPE Letter - Request for Additional Information (17/02/2023) 2. Email correspondence between DPE to CTPG regarding review comments on the 2022 IEA audit 3. DPE Letter - IEA Report acceptance (24/03/2023)	The Department reviewed the 2022 IEA undertaken in June/July 2022 (referred to hereafter as the initial 2022 IEA) and provided a request for additional information. All comments have been addressed by the Auditor and CTPG and accepted by the Department (24/03/2023).	
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 A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in Schedule 3 condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	NT	N/A	This condition is provided for clarification and is not an auditable matter.	
<b>Limits of Consent</b>					
A5	This consent lapses five years after the date of consent unless work is physically commenced within the meaning of section 4.53(4) of the EP&A Act.	C	1. Site Inspection (16/03/2023) 2. IEA interviews	The construction works for sub-stages 1 - 3 (as detailed under condition B1) were observed to have been completed during the site inspection. Sub-stage 4 had not commenced at the time of this IEA.	
<b>Student and Staff Numbers</b>					
A6	A maximum school population of 1650 students ( 500 additional students) and 290 (36 additional) staff are permitted at the school at any one time as part of Stage 1 works.	C	1. 2022 school census data email (11/8/2022) 2. IEA interviews	Confirmation received from the Director of Business Services confirmed that the 2022 consensus numbers were: - 219 staff (198 FTE staff) - 1156 students. This numbers are below the number of staff and students permitted for sub-stages 2 & 3. Substage 4 (construction) is yet commence, the Auditee confirmed the numbers will not be exceeded and will be confirmed in the next IEA.	
A7	A maximum of 216 students ( enrolled at the school) are permitted as boarders within the Boarding Accommodation at any one time as part of the Stage 1 works.	NT	N/A	This condition applies to substage 4 which had not commenced at the time of this IEA.	

<p style="text-align: center;"><b>Loreto Normanhurst School Redevelopment</b>  <b>Independent Environmental Audit</b>  <b>Determination of a Development Application for State Significant, Development Consent (8996)</b></p>					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
A8	Notwithstanding Schedule 2 condition A6: (a) the increase in student and staff population must be staged in accordance with the specified maximum population listed for each substage in the amended staging plan required by Schedule 3 condition 81; (b) no increase in student numbers is permitted unless the five additional drop-off/pick-up spaces, the through site road and two additional bus bays are constructed and operational on the site; and (c) the sequential increase in the student and staff population for the relevant substage must only occur once evidence is provided to the satisfaction of the Certifier demonstrating that the specified transport infrastructure for the relevant substage has been completed in accordance with the amended staging plan required by Schedule 3 condition 81.	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 03, dated 7 December 2021. 2. Loreto Normanhurst SSD8996 Staging Report Rev 04, dated 19 November 2022 3. SE220007.01 Loreto Normanhurst IEA Audit Report Rev 3 (Epic Environmental, 22/03/2023)	Substages 1 - 3 were completed in October 2022 and compliance with this condition for these stages was confirmed during the initial 2022 IEA via detail included in the Staging Report Rev03. The amended Staging Report Rev 04 also confirmed compliance with this condition: - Section 1.2.1 Stage 1 Works Substages: table includes maximum permitted student and staff numbers per substage. At the time of this IEA, Substage 4 construction works was yet to commence.	
<b>Staging</b>					
A9	The project may be constructed and operated in stages. Where compliance with conditions is required to be staged due to staged construction or operation, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the satisfaction of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction ( or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 04, dated 19 November 2022. 2. Revised Staging Report Approval Letter signed 16/12/2022 (DPE).	A copy of the amended Staging Report Rev 04 was received as evidence. A copy of the letter received from the secretary (dated 16/12/2022) indicating that the requirements of condition A9 of SSD8669 have been satisfied and stated: '- was originally approved under condition A9 by the Department on 10 December 2021 (revision 3 dated 7 December 2021) - was reviewed by the applicant - no issues raised - contains information required by conditions A10 of the consent - number of substages remains unchanged with the exception of timelines for substages 4 and 5 and demolition and hard and soft landscaping form substage 4 and 5 - Satisfied that the Staging Report Revision 4 had been prepared in accordance with conditions A13c) and A14 of SSD-8996	
A10	A Staging Report prepared in accordance with Schedule 3 condition A9 must: (a) be generally consistent with the construction staging plan detailed in 'Loreto Normanhurst School Redevelopment (Concept and Stage 1 DA) - SSD 8996 Staging Plan', prepared by Ethos Urban and dated 19 May 2021 as amended by Schedule 3 condition B1; (b) demonstrate that the student/ staff number increase, car parking numbers, pick-up/ drop-off facilities would be provided in accordance with the approved staging plan, as amended by Schedule 3 condition B 1; (c) demonstrate the four existing pick-up/drop-off spaces next to the Gonzaga Barry building and accessed from Osborn Road would not be removed and would remain in operation until the five new pick-up/drop-off spaces and associated infrastructure have been constructed and are operational; (d) set out how the construction of the whole of Stage 1 will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; (e) 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); (f) specify how compliance with conditions will be achieved across and between each of the stages of the project; and (g) set out mechanisms for managing any cumulative impacts arising from the proposed staging.	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 04, dated 19 November 2022. 2. Revised Staging Report Approval Letter signed 16/12/2022 (DPE).	The Staging Report Rev 04, dated 19/11/2022 was approved by DPE (letter dated 16/12/2022). Detail included in the Staging Report demonstrating compliance with this condition included: a) The table in Section 1.2.1 Stage 1 Works Substages is consistent with the detail outlined in condition B1 b) Section 1.2.1 Stage 1 Works Substages outlines: '- details of the substage, maximum permitted student and staff numbers and transport infrastructure to be provided. c) Section 1.3 Staging Schedule: includes detail outlining that the 5 new spaces will become operational at completion of substages 1 and 2, and the existing 4 spaces next to the Gonzaga Barry Building will be reallocated to bus use (4 bus bay). A statement is also included that access to the spaces will not be removed during construction of substages 1 and 2. d) and e) Section 1.3 Staging Schedule, Table 2: Staging Schedule: identifies the area and activity, duration and relevant substage for stage 1. e) Section 1.3.1 Operation Table 3: Indicative Operation Dates identifies the substage, description and indicative operation date. f) Appendix A includes details of the Development consent conditions for compliance against SSD8996 and identifies: '- the condition number and wording (detail) - relevant stages - relevant development phases - relevant authority - responsibility for implementing /ensuring compliance g) Section 3 Management of Cumulative Impacts includes a statement that the project will be developed and staged in accordance with the EIS and staging will minimise environmental impacts. No cumulative impacts have been identified. The following subsections outline separation mitigation measures: '- 3.1.1 fencing and hoarding - 3.1.2 traffic management - 3.1.3 pedestrian protection - 3.1.4 substage mitigation measures.	

<p style="text-align: center;"><b>Loreto Normanhurst School Redevelopment</b>  <b>Independent Environmental Audit</b>  <b>Determination of a Development Application for State Significant, Development Consent (8996)</b></p>					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 04, dated 19 November 2022 2. Site inspection	The site inspection confirmed the site works for substages 1 - 3 were compliant with the staging schedule provided in Table 2 of the Staging Report Rev 04. Substage 4 is yet to commence.	
A12	Where construction or operation is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report.	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 04, dated 19 November 2022 2. Revised Staging Report Approval Letter signed 16/12/2022 (DPE).	The site inspection confirmed the site works for substages 1 - 3 were compliant with the staging schedule provided in Table 2 of the Staging Report Rev 04. Substage 4 is yet to commence.	
<b>Staging, Combining and Updating Strategies, Plans or Programs</b>					
A13	The Applicant may: (a) prepare and submit any strategy, plan (including management plan, architectural or design plan) or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan (including management plan, architectural or design plan) or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan (including management plan, architectural or design plan) or program); (b) combine any strategy, plan (including management plan, architectural or design plan), or program required by this consent (if a clear relationship is demonstrated between the strategies, plans (including management plan, architectural or design plan) or programs that are proposed to be combined); and (c) update any strategy, plan (including management plan, architectural or design plan), or program required by this consent (to ensure the strategies, plans (including management plan, architectural or design plan), or programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 04, dated 19 November 2022. 2. Revised Staging Report Approval Letter signed 16/12/2022 (DPE). 3. Letter - Condition A14 satisfied (DPE, 16/12/2022) 4. Community Communication Strategy (11/11/2022) 5. Letter - Condition A13 and A14 satisfied (DPE, 16/12/2022)	Evidence provided demonstrated that an updated Staging Report (Rev 4, 19/11/2022) and the revised Community Communication Strategy were submitted to and approved by DPE 16/12/2022.	
A14	Any strategy, plan or program prepared in accordance with condition A 13, where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary.	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 04, dated 19 November 2022. 2. Revised Staging Report Approval Letter signed 16/12/2022 (DPE) 3. Planning Portal - Loreto Normanhurst School Redevelopment (Concept Proposal and Stage 1) 4. Letter - Condition A13 and A14 satisfied (DPE, 16/12/2022) 5. IEA interviews	Evidence provided demonstrated that all the latest approved strategy, plan or program were approved and uploaded to the Planning Portal for substage 1 - 3 (which are now complete). The letter dated 16/12/2022 from DPE confirmed that the requirements of this condition has been met for the revised Community Communication Strategy.  The Auditee confirmed that new site specific management plans will be developed by the awarded contractor for submission and approval prior to the commencement of Substage 4.	
A15	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.	NT	N/A	This condition provides permissions to the applicant and is not auditable.	
A16	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.	C	1. Various Management plans, strategies etc 2. IEA interviews	All documentation provided as evidence for the initial 2022 IEA for substages 1 -3 were confirmed as being current and up to date. Substage 4 is yet to commence, however the Auditee confirmed that strategies, plans, or programs will be implemented in accordance with the condition that requires the strategy, plan, program or drawing	
<b>Prescribed Conditions</b>					
A17	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	NT	N/A	No prescribed conditions have been applied under the EP&A Regulation.	
<b>Planning Secretary as Moderator</b>					
A18	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, to the extent to which the Planning Secretary has power under the EP&A Act.	NT	N/A	The condition is provided for clarification and is not an auditable matter.	



Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
<b>Evidence of Consultation</b>					
A19	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document for information or approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	NC	1. SE220007.01 Loreto Normanhurst IEA Audit Report Rev 3 (Epic Environmental, 22/03/2023) 2. IEA interviews	This condition requires for consultation triggered by the consent to be undertaken prior to submission of the document for approval. Such consultation is required under sub-clauses '- C5(a) (Pre-Construction Dilapidation Survey Report) - C16(b) (Construction Pedestrian and Traffic Management Plan - C18(a) (Construction Soil and Water Management Plan). <del>Whilst the consultation required under C5(a), the</del> <b>Consultation with asset owners under condition C5(a) was in progress for substage 4 at the time of this IEA.</b> <b>Consultation required under C16(b) and C18(a) was identified as a NC in the initial 2022 IEA. Evidence had not been sought as substages 1 - 3 were complete at the time of this IEA and future stages will require new management plans.</b> <del>Consultation required under C16(b) and C18(a) was identified as a NC in the initial 2022 IEA.</del> <del>Substage 1 - 3 were complete at the time of this IEA and evidence had not been sought retrospectively.</del> The Auditee confirmed that prior to the commencement of substages 4 -6, the relevant management plans will be submitted to the TfNSW and Council.	NC - 01
<b>Structural Adequacy</b>					
A20	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. <b>Note:</b> Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	C	1. Construction Certificate #1(CC-21198) 17/12/2021 (Blackett Maguire + Goldsmith) 2. Construction Certificate #2 (CC-2204) 24/02/2022 (Blackett Maguire + Goldsmith) 3. Occupation Certificate (OC-22169) 22/11/2022 (Blackett Maguire + Goldsmith) 4. Occupation Certificate (OC-22128) 20/10/2022 (Blackett Maguire + Goldsmith)	Construction and occupation certificates sighted demonstrated compliance with the requirements of this condition: - Construction Certificate #1 approved for one way link road between Osborn Road and Mount Pleasant Avenues cross site connection with revised PUDO arrangements (only associated with the redevelopment of the Loreto Normanhurst School) - Construction Certificate #2 approved for increased parking at Osborn Road Carpark and removal of one exiting tennis court and replacement of one part underground carpark, with a new sports court constructed on the roof. - Occupation Certificate OC22169 - for remedial works to heritage listed entry gat on Pennant Hills Road - Occupation Certificate OC22128 for the completed redevelopment of Loreto Normanhurst School Substages 1, 2 and 3.	
<b>External Walls and Cladding</b>					
A21	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	NT	N/A	This condition is not applicable to substages 1-3 (completed) and will be triggered once the structures are completed for substage 4 and will form part of the building certifications.	
<b>Design and Construction for Bush Fire and Emergency Vehicle Access</b>					
A22	Water, electricity and gas must comply with sections 4.1.3 and 4.2.7 of Planning for Bush Fire Protection 2006 (or any other updated version).	C	1. Bushfire Protection Assessment, Loreto Normanhurst - Stage 1 Works and Master Plan. 2. Email from Eco Logical to the certifier (dated 7/12/21). 3. IEA interview	The email from Eco Logical confirmed that bushfire protection measures for construction standards, access, gas, and multi-storey development require no bushfire response to be addressed given the proposed development is greater than 100 m from the bushfire hazard.	
A23	Landscaping to the site must comply with the principles of Appendix 5 of Planning for Bush Fire Protection 2006 (or any other updated version) and must ensure that the compliance with this provision does not result in removal of additional trees apart from that permitted by this development consent.	C	1. Bushfire Protection Assessment, Loreto Normanhurst - Stage 1 Works and Master Plan. 2. Email from Eco Logical to the certifier (dated 7/12/21). 3. IEA interview	No non-conformances with the landscape designs (section 3, 6 and Appendix A of the Bushfire Protection Assessment) were identified during the IEA. Email from Eco Logical to the certifier (dated 7/12/21) confirmed compliance with the condition has been satisfied as a result of the findings of the Bushfire Protection Assessment.	

**Loreto Normanhurst School Redevelopment  
Independent Environmental Audit**

**Determination of a Development Application for State Significant, Development Consent (8996)**

Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
A24	A Bush Fire Emergency Management and Evacuation Plan must be prepared consistent with 'Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan December 2014'.	C	1. Email from Eco Logical to the certifier (dated 7/12/21). 2. IEA interview	Email from Eco Logical to the certifier (dated 7/12/21) confirmed compliance with the condition has been satisfied as a result of the findings of the Bushfire Protection Assessment.	
A25	Emergency vehicle access must continue to be provided onto the sports fields from Mount Pleasant Avenue and/or Osborn Road.	C	1. Audit interviews 2. Site inspection	substages 1 - 3 were complete at the time of this IEA, however observations made during the site inspection and confirmation from the Auditee confirmed that emergency access from Mount Pleasant Osbourne Roads had been maintained for the duration of substages 1 - 3 and that emergency vehicle access from Mount Pleasant / Osbourne Roads would be continued during substage 4 construction. The Auditee confirmed that this plan will be reviewed and updated as required for substage 4 and will be submitted to the certifier for approval if required.	
<b>Applicability of Guidelines</b>					
A26	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.	NT	N/A	The condition is provided for clarification and is not an auditable matter.	
A27	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.	NT	N/A	The condition is provided for clarification and is not an auditable matter.	
<b>Monitoring and Environmental Audits</b>					
A28	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, noncompliance notification, Site audit report and independent auditing. <b>Note:</b> 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.	NT	N/A	The condition is provided for clarification and is not an auditable matter.	
<b>Access to Information</b>					

Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
A29	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in 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; (viii) a complaints register, updated monthly; (ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report; (x) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary, and publicly available for 12 months after the commencement of operations.	C	1. IEA interview 2. <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a>	a) The following information was observed to be available via the Applicant's website: (i) the documents referred to in Schedule 3 condition A2 of this consent (link to the NSW Planning Portal where documents are published) (ii) all current statutory approvals for the development (via a link to the NSW Planning Portal) (iii) all approved strategies, plans and programs required under the conditions of this consent (vi) a summary of the current stage and progress of the development (vii) contact details to enquire about the development or to make a complaint (viii) details for making a complaint  The following information was not published on the website at the time of the IEA. At the time of this IEA, the initial 2022 IEA was undergoing a review by the DPE and the final audit report submitted and accepted by DPE (24/03/2023) was yet to be published: (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; (iv) 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  The following information was not triggered at the time of the IEA: (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 <b>21/08/2023: A review of the Applicants website on 21/08/2023 confirmed that a complaints register and the initial 2020 IEA report have been published on the Applicants website. Confirmation from the Auditee confirmed that there were no requirements to undertake environmental monitoring.</b>	
<b>Compliance</b>					
A30	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.	C	1. Information provided to Cowyn prior to works commencing 2. IEA interviews	The contractor (Cowyn) was aware of and provided evidence of being provided all conditions of consent as part of the project engagement for Substages 1 - 3. The Auditee confirmed that all employees, contractors (and their sub-contractors) will be made aware of, and will be instructed to comply with, the conditions of this consent relevant to activities they carry out in	
<b>Incident Notification, Reporting and Response</b>					
A31	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.	NT	N/A	No incidents causing environmental harm were identified during the IEA.	
A32	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.	NT	N/A	No incidents causing environmental harm were identified during the IEA.	
<b>Non-Compliance Notification</b>					
A33	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	C	1. Email - Independent Audit RFI (CTPG, 23/03/2023) 2. Letter - Loreto Normanhurst School Redevelopment (SSD/8996) Independent Environmental Audit (DPE, 24/03/2023)	Non-compliances were identified through the previous audit and the Planning Secretary was notified via submission of the audit report. All RFI items were addressed and the final audit report was submitted via the portal. The letter from DPE confirms that the IEA report generally satisfies the reporting requirements of the consent.	
A34	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.	C	1. Email - Independent Audit RFI (CTPG, 23/03/2023) 2. Letter - Loreto Normanhurst School Redevelopment (SSD/8996) Independent Environmental Audit (DPE, 24/03/2023)	Non-compliances were identified through the previous audit and the Planning Secretary was notified via submission of the audit report which identified . All RFI items were addressed and the final audit report was submitted via the portal. The letter from DPE confirms that the IEA report generally satisfies the reporting requirements of the consent.	
A35	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	NT	N/A	No incidents causing environmental harm were identified during the IEA.	
<b>Revision of Strategies, Plans and Programs</b>					

<p style="text-align: center;"><b>Loreto Normanhurst School Redevelopment</b>  <b>Independent Environmental Audit</b>  <b>Determination of a Development Application for State Significant, Development Consent (8996)</b></p>					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
A36	<p>Within three months of:</p> <p>(a) the submission of a compliance report under Schedule 3 condition A38;            (b) the submission of an incident report under Schedule 3 condition A32;            (c) the submission of an Independent Audit under Schedule 3 condition D37;            (d) the approval of any modification of the conditions of this consent; or            (e) the issue of a direction of the Planning Secretary under Schedule 3 condition A2 which requires a review</p> <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.</p>	NC	<p>1. Email correspondence requesting additional information (DPE, 17/02/2023 and 21/03/2023)            2. SE 220007.01 Loreto Normanhurst IEA Report Rev 3 (Epic Environmental, 22/03/2023)            3. Email - Independent Audit RFI (CTPG, 23/03/2023)            4. Letter - Loreto Normanhurst School Redevelopment (SSD/8996) Independent Environmental Audit (DPE, 24/03/2023)            5. IEA interview</p>	<p>The initial IEA was undertaken between June and July 2022, with the IEA report submitted to the Planning Secretary in October 2022. Subsequently the Planning Secretary requested additional information be provided in relation to the IEA (dated 17/02/2023 and 21/03/2023). All items were addressed, and a final report was submitted and accepted by the Department in March 2023.</p> <p>The requirement to undertake a review of the strategies, plans and programs required under this consent within 3 months of (c) the submission of an Independent Audit under Schedule 3 condition D37 did not occur as works for substage 1 - 3 as works were complete prior to the submission of the initial 2022 IEA Report.</p> <p>The Auditee confirmed that all strategies, plans and programs will be updated as required for future stages of the project (substages 4 – 6).</p>	NC-02
A37	<p>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.</p> <p><b>Note:</b> 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.</p>	C	<p>1. IEA interview</p>	<p>The Auditee confirmed that new strategies, plans and programs relevant to Substage 4 will be developed and submitted to the Planning Secretary and the Certifier for review and approval. They will also be published as required.</p>	
<b>Compliance Reporting</b>					
A38	<p>Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).</p>	NC	<p>1. Email correspondence requesting additional information (DPE, 17/02/2023 and 21/03/2023)            2. SE 220007.01 Loreto Normanhurst IEA Report Rev 3 (Epic Environmental, 22/03/2023)            3. Email - Independent Audit RFI (CTPG, 23/03/2023)            4. Letter - Loreto Normanhurst School Redevelopment (SSD/8996) Independent Environmental Audit (DPE, 24/03/2023)            5. IEA interview</p>	<p>The method of this IEA was developed and executed in accordance with the Independent Audit Post Approval Requirements (2020).</p> <p>Table 1 of the Independent Audit Post Approval Requirements (2020) requires the initial IEA be undertaken within 12 weeks of the commencement of construction and then at intervals no greater than 26 weeks from the date of the initial independent audit.</p> <p>The initial 2022 IEA was undertaken 16 June 2022 (was due in March 2022), with the IEA report submitted to DPE 10 November 2022. This IEA was due to be undertaken in December 2022, however it was completed in March 2023, therefore was after the deadline prescribed under the Independent Audit Post Approval Requirements (2020).</p>	NC-03
A39	<p>Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.</p>	NC	<p>1. Email correspondence requesting additional information (DPE, 17/02/2023 and 21/03/2023)            2. SE 220007.01 Loreto Normanhurst IEA Report Rev 3 (Epic Environmental, 22/03/2023)            3. Email - Independent Audit RFI (CTPG, 23/03/2023)            4. Letter - Loreto Normanhurst School Redevelopment (SSD/8996) Independent Environmental Audit (DPE, 24/03/2023)            5. IEA interview</p>	<p><del>The initial 2022 IEA report was not submitted within the timeframes outlined in Table 1 Compliance Reporting Post Approval Requirements (2020).</del></p> <p><b>Table 1 of the Independent Audit Post Approval Requirements (2020) requires the initial IEA be undertaken within 12 weeks of the commencement of construction and then at intervals no greater than 26 weeks from the date of the initial independent audit.</b></p> <p><b>The initial 2022 IEA was undertaken 16 June 2022 (was due in March 2022), with the IEA report submitted to DPE 10 November 2022. This IEA was due to be undertaken in December 2022, however it was completed in March 2023, outside the timelines prescribed in the Independent Audit Post Approval Requirements (2020).</b></p>	NC-03
A40	<p>The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.</p>	NT	N/A	<p>At the time of this IEA, the 2022 IEA #1 report was undergoing review by the Planning Secretary. The final report submitted and accepted by the Planning Secretary was March 2023. The IEA report is yet to be made publicly available (due 60 days from March 2023).</p>	
A41	<p>Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.</p>	NT	N/A	<p>Compliance reports are triggered during operations pursuant to Compliance Reporting Post Approval Requirements (2020).</p>	

Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
<b>PART B PRIOR TO THE ISSUE OF A CONSTRUCTION CERTIFICATE</b>					
<b>Amendments to staging of student and staff increases and transport infrastructure facilities</b>					
B1	Prior to the issue of any construction certificate in relation to Stage 1, a revised staging plan must be prepared and submitted to the satisfaction of the Planning Secretary. The revised staging plan must incorporate all substages, associated maximum permitted student and staff numbers and the required transport infrastructure as listed in the table below:	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 04, dated 19 November 2022. 2. Revised Staging Report Approval Letter signed 16/12/2022 (DPE). 3. Construction Certificate CC-21198 (Blackett Maguire + Goldsmith, 17/12/2022) 4. Construction Certificate CC-22014 (Blackett Maguire + Goldsmith, 24/02/2022) 5. IEA interview	An amended staging plan was approved Substage 4 was approved by the DPE dated 16/12/2023. Construction certificates have been obtained for substages 1 - 3.	
<b>Design Amendments</b>					
B2	Prior to the issue of any construction certificate for Stage 1, the approved architectural and landscape plans listed in Schedule 3 condition A2 relating to the boarding accommodation building must be amended to incorporate the following changes to the design of the boarding accommodation building to the satisfaction of the Planning Secretary: (a) the at-grade waste collection area including associated hard stand areas and separate driveway must be deleted and the existing trees in this location (Tree Nos. 227, 321, 323, 324, 328, 331, 335, 336 and 337 as identified on the landscape plans) must be retained; (b) the design of the basement must be amended to enable the trees listed in (a) above to be retained; (c) the waste collection area must be relocated to the basement; (d) the design of the basement, including ceiling clearance and turning circle, must be redesigned to enable a waste collection vehicle to enter and exit the basement in a forward direction; (e) the redesigned basement required by (b) above must not result in the removal of any other existing trees; and (f) the tree identified as T195 on Landscape Drawing L-000, Revision C, prepared by Oculus and dated 16/07/21 must be retained through design mitigation and tree protection measures to allow for access and retention of the existing tree.	C	1. Substage 4 Landscape plans_marked up (Oculus, AJ&C, 8/12/2020) 2. Approval Letter - conditions B2, B3, B4, B5, B18 and D20 (DPE, 15/12/2021) 3. IEA interview	A review of the landscape plans uploaded to the Planning Portal confirmed that the landscape plans had been amended in accordance with the requirements of this condition. The letter from DPE acknowledged the submission of the landscape and architectural plans submitted to the Planning Secretary in accordance with conditions B2, B3, B4, B5, B18 and D20 of SSD 8996, lists the updated plans and relevant consent conditions and includes a statement approving the plans required under these conditions of consent.  Substage 4 is yet to commence. The construction certificate will be issued at the completion of Stage 1. The Auditee confirmed that the plans required to be submitted and approved prior to the commencement of Substage 4 were still in progress at the time of this IEA.	
B3	Prior to the issue of any construction certificate for Stage 1, the approved architectural and landscape plans listed in Schedule 3 condition A2 relating to the P3A Osborn Road carpark must be amended to incorporate the following changes to the design of the P3A Osborn Road carpark to the satisfaction of the Planning Secretary: (a) existing tree nos. T413 to T420 and T472 as identified on the landscape plans must be retained; (b) the tandem car parking spaces from the western (Osborn Road) side to the eastern (oval side) of the carpark must be relocated or the carpark redesigned in another manner which results in the retention of the trees listed in (a) above as may be agreed to by the Planning Secretary.	C	1. Substage 4 Landscape plans_marked up (AJ&C, 8/12/2020) 2. Landscape plans (Arcadia 5/11/2021) 3. Approval Letter - conditions B2, B3, B4, B5, B18 and D20 (DPE, 15/12/2021) 4. IEA interview	A review of the landscape plans uploaded to the Planning Portal confirmed that the landscape plans had been amended in accordance with the requirements of this condition. The letter from DPE acknowledged the submission of the landscape and architectural plans submitted to the Planning Secretary in accordance with conditions B2, B3, B4, B5, B18 and D20 of SSD 8996, lists the updated plans and relevant consent conditions and includes a statement approving the plans required under these conditions of consent.	
<b>Electrical Substation</b>					
B4	Prior to the issue of any construction certificate for Stage 1, the Applicant must submit detailed plans of the electrical stand-alone substation to the satisfaction of the Planning Secretary. The plans must: (a) demonstrate that service connections, cabling or associated works would not be located within Tree Protection Zone or Structural Root Zone of any existing trees; (b) confirm appropriate tree protection measures to be implemented during construction (if required); (c) demonstrate that the substation front is accessed from the existing Primary School car park driveway and does not include a new separate driveway connected to Mount Pleasant Avenue; and (d) include details of landscaping around the substation to visually screen / reduce the visibility of the structure from Mount Pleasant Avenue.	C	1. Substage 4 Boarding House Site Analysis Plan Rev A_Marked up (AJ&C, 8/12/2020) 2. Approval Letter - conditions B2, B3, B4, B5, B18 and D20 (DPE, 15/12/2021) 3. IEA interview	The marked up plans uploaded to the Planning Portal confirm compliance with the requirements of this condition. The letter from DPE acknowledged the submission of the landscape and architectural plans submitted to the Planning Secretary in accordance with conditions B2, B3, B4, B5, B18 and D20 of SSD 8996, lists the updated plans and relevant consent conditions and includes a statement approving the plans required under these conditions of consent.	
<b>Landscape Plans</b>					

Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
B5	Prior to the issue of any construction certificate for Stage 1, the Applicant must prepare updated Landscape Plans, to the satisfaction of the Planning Secretary. The Landscape Plans must: (a) incorporate the design amendments in Schedule 3 conditions B2, B3 and B4; (b) confirm the resulting tree canopy site coverage is no less than 42% of the site area (13.17 hectares); (c) detail the location, species, maturity and height at maturity of plants to be planted onsite; (d) include a majority of plants (trees, shrubs and groundcovers) endemic to the local area; (e) include details to confirm that all trees to be planted on site will be advanced stock in containers of 200 litres or greater; (f) include detailed design to demonstrate that the front setback of the boarding accommodation building (facing Mount Pleasant Avenue) includes canopy trees and minimal hard surfaces; (g) include the provision of any nest boxes required by Schedule 3 condition D20; and (h) comply with the principles of Appendix 5 of Planning for Bush Fire Protection 2006 (or any other updated version).	C	1. Substage 4 Landscape plans_marked up (AJ&C, 8/12/2020) 2. Landscape plan (Arcadia 5/11/2021) 3. Approval Letter - conditions B2, B3, B4, B5, B18 and D20 (DPE, 15/12/2021) 4. IEA interview	A review of the landscape plans uploaded to the Planning Portal confirmed that the landscape plans had been amended in accordance with the requirements of this condition. The letter from DPE acknowledged the submission of the landscape and architectural plans submitted to the Planning Secretary in accordance with conditions B2, B3, B4, B5, B18 and D20 of SSD 8996, lists the updated plans and relevant consent conditions and includes a statement approving the plans required under these conditions of consent	
<b>External Walls and Cladding</b>					
B6	Prior to the issue of the 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 Secretary within seven days after the Certifier accepts it.	NT	1. IEA interview	The construction certificate will be issued at the completion of Stage 1 (substage 4). The Auditee confirmed that the requirements of this condition were in progress at the time of this IEA.	
<b>BASIX</b>					
B7	Prior to the issue of a construction certificate for the boarding accommodation building, the Applicant must submit to the satisfaction of the Certifier evidence the staff apartments would be constructed in accordance with the BASIX Certificate no. 1194482M commitments. The BASIX Certificate must be submitted to the Certifier with all commitments clearly shown on the Construction Certificate plans. An updated certificate must be issued if relevant design amendments are made.	NT	1. IEA interview	The Auditee confirmed that the requirements of this condition were in progress at the time of this IEA.	
<b>Stormwater Management</b>					
B8	Prior to the issue of the relevant construction certificate that involves stormwater works, the Applicant must provide detailed design plans for an operational stormwater management system for that stage of the development, to the Certifier for approval. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the SRTS as listed in the table below (as amended by the conditions of this consent where applicable); (c) be in accordance with applicable Australian Standards; (d) include details of the on-site detention system and water sensitive urban design measures as required by the conditions of this development consent; (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 (f) be designed for an average recurrence interval (ARI) of 20 years and be gravity drained and connected to an existing Council piped drainage system.	C	1. Construction Certificate CC-21198 (Blackett Maguire + Goldsmith, 17/12/2022) 2. Construction Certificate CC-22014 (Blackett Maguire + Goldsmith, 24/02/2022) 3. IEA interview	The construction certificate relevant to substages 1 -3 have been obtained for: - Construction of a one way link road between Osborn Road and Mount Pleasant Avenue cross site connection with revised PUDO arrangements only associated with the redevelopment of Loreto Normanhurst School.. - Construction of increased parking at Osborn Road carpark and removal of one (1) existing sports tennis court and replacement with one (1) part underground carpark, comprising of a new sports court constructed on the roof only associated with the redevelopment of Loreto Normanhurst	

Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
B9	Prior to the issue of the relevant construction certificate, the Applicant must design an on-site stormwater detention system for the development and submit it to the Certifier for approval. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) have a capacity of not less than 115 cubic metres (m3), and a maximum discharge (when full) of 114 m3 per second; (c) have a surcharge/inspection grate located directly above the outlet; (d) ensure the discharge from the detention system is controlled via 1 metre (m) length of pipe, not less than 150mm diameter or via a stainless plate with sharply drilled orifice bolted over the face of the outlet discharging into a larger diameter pipe capable of carrying the design flow to an approved / existing Council drainage system; and (e) ensure that where above ground and the average depth is greater than 0.3m, a 'pool type' safety fence and warning signs are installed.	C	1. Construction Certificate CC-21198 (Blackett Maguire + Goldsmith, 17/12/2022) 2. Construction Certificate CC-22014 (Blackett Maguire + Goldsmith, 24/02/2022) 3. IEA interview	The construction certificate relevant to substages 1 -3 have been obtained for: - Construction of a one way link road between Osborn Road and Mount Pleasant Avenue cross site connection with revised PUDO arrangements only associated with the redevelopment of Loreto Normanhurst School.. - Construction of increased parking at Osborn Road carpark and removal of one (1) existing sports tennis court and replacement with one (1) part underground carpark, comprising of a new sports court constructed on the roof only associated with the redevelopment of Loreto Normanhurst	
B10	Prior to the issue of the relevant construction certificate that involves stormwater works that would result in any change to existing stormwater drainage on Pennant Hills Road, detailed design plans and hydraulic calculations of the stormwater drainage system must be submitted to and be endorsed by TfNSW. Evidence of such endorsement must be provided to the Certifier prior to the issue of the construction certificate for those stormwater management works.	NT	1. IEA interview	The construction certificate will be issued at the completion of Stage 1 The Auditee confirmed that the requirements of this condition were in progress at the time of this IEA.	
B11	Prior to the issue of the relevant construction certificate, a Water Sensitive Urban Design (WSUD) Strategy must be submitted to the Certifier for approval. The WSUD Strategy must: (a) be prepared by a suitably qualified and experienced person(s); (b) be peer-reviewed and certified by a qualified hydraulic engineer; (c) include the recommended water quality devices and targets contained within the Civil Engineering Report and plans prepared by Taylor Whitting Consulting Engineers, dated 17 December 2020, including (but not limited to): (i) 1 00kL rainwater tank; (ii) vegetated swale/s; (iii) gully pit insert/ baskets designed to capture pollution prior to it running into stormwater drains; and (iv) storm filter cartridges or equivalent; (d) comply with the water quality targets set out in the Hornsby Development Control Plan 2013;and (e) be supported by a MUSIC model.	NT	1. IEA interview	The construction certificate will be issued at the completion of Stage 1 The Auditee confirmed that the requirements of this condition were in progress at the time of this IEA.	
<b>Operational Noise - Design of Mechanical Plant, Equipment and School Bell / PA System</b>					
B12	Prior to the issue of the relevant construction certificate for the design of mechanical plant/ equipment and school bell/ PA system, the Applicant must incorporate appropriate noise mitigation measures into the detailed design drawings. The Certifier must verify that all noise mitigation measures have been incorporated into the design to ensure the development will not exceed the recommended operational noise levels identified in the Construction and Operational Noise Assessment prepared by Wilkinson Murray and dated 16 December 2020.	NT	N/A	The Auditee confirmed that the construction certificate will be issued at the completion of Stage 1.	
<b>Operational Waste Storage and Collection</b>					
B13	Prior to the issue of the relevant construction certificate for the operational waste storage and collection areas, the Applicant must obtain agreement from Council for the design of the operational waste storage area (where waste removal will be undertaken by Council). Where waste removal will be undertaken by a private contractor, the design of the operational waste storage area must be in accordance with Council's standards. Evidence of the design and Council endorsement (where relevant) must be provided to the Certifier.	NT	N/A	The Auditee confirmed that the construction certificate will be issued at the completion of Stage 1.	
<b>Public Domain Works</b>					

Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
B14	Prior to the issue of the 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.	NT	N/A	The Auditee confirmed that the construction certificate will be issued at the completion of Stage 1.	
B15	Separate construction certificate applications under the provisions of section 138 of the Roads Act 1993 must be submitted with the relevant road authority (Council/ TfNSW as relevant) for works within their land or public reserves including new vehicular crossings.	NT	N/A	The Auditee confirmed that the construction certificate will be issued at the completion of Stage 1.	
B16	Public domain works relating to Council property must be designed in accordance with AUSSPEC Specifications ( <a href="http://www.hornsby.nsw.gov.au/property/build/aus-spec-terms-andconditions">www.hornsby.nsw.gov.au/property/build/aus-spec-terms-andconditions</a> ) and comply with the following requirements: (a) any damaged footpath, kerb, gutter and stormwater drainage pits and pipes as a result of the development must be reconstructed; (b) the land adjoining the footpath must be fully turfed; (c) any public utility adjustments must be carried out at the cost of the applicant and to the requirements of the relevant public authority; (d) any damaged road pavement, as a result of the development, must be saw cut a minimum of 600 mm from the existing edge of the bitumen and reconstructed; and (e) the submission of a compaction certificate from a geotechnical engineer for any fill within road reserves, and all road sub-grade and road pavement materials.	C	1. Site Inspection	The only public domain work that had been completed at the time of the IEA was the kerb and channel for the driveway access to the Osborn Road carpark. All footpath kerb and gutters were observed to be reconstructed. Landscaping had also been completed. The scope of works did not require any public utility adjustments, reinstatement of road pavement or any fill placed within the road reserve.	
<b>Operational Car Parking, Access, Drop-off/Pick-up and Service Vehicle Layout</b>					
B17	Prior to the issue of the relevant construction certificate, evidence must be submitted to the satisfaction of the Certifier that the proposed access, parking and servicing arrangements comply with the following requirements: (a) adequate number of car spaces are provided in each substage in accordance with Schedule 3 condition B1; (b) amendments to the car parking layout are in accordance with Schedule 3 condition B3; (c) new and amended car parking spaces are designed in accordance with the latest versions of AS 2890.1 and AS 2890.6; (d) the basement access to the boarding accommodation building is designed to accommodate the turning path of a 6.5m medium rigid truck; (e) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the latest version of AS 2890.2; (f) design levels at the front boundary have been approved by Council; (g) the driveway pavement complies with AS 3727 and is a minimum 3m wide; (h) the pavement has a kerb to one side and a one-way cross fall with a minimum gradient of 2 percent and a lintel and pit provided at the low point; (i) retaining walls required to support the carriageway and the compaction of all fill batters are designed in accordance with the requirements of a structural engineer; (j) safety rails are provided where there is a level difference more than 0.3m and a 1 :4 batter cannot be achieved; (k) pedestrian grades steeper than 12.5% are provided with surface texturing, brushing or cleats to satisfy Class V: R 11 ramps in accordance with Australian Standards AS 4586- 2004 Clause 5.2; and (l) longitudinal sections along centreline of the access driveway are provided in accordance with the relevant sections of AS 2890.1 to demonstrate that: (i) the maximum grade does not exceed 1 in 4 (25%) with the maximum changes of grade of 1 in 8 (12.5%) for summit grades and 1 in 6.7 (15%) for sag grades; (ii) any transition grades have a minimum length of 2m; and (iii) the longitudinal sections incorporate the street cross-over design levels obtained from Council.	C	1. Construction Certificate CC-21198 (Blackett Maguire + Goldsmith, 17/12/2022) 2. Construction Certificate CC-22014 (Blackett Maguire + Goldsmith, 24/02/2022) 3. IEA interview	The OTAMP outlines details for carparking onsite.  Auditee confirmed that the requirements of this condition were in progress at the time of this IEA for substage 1 - 3.	
<b>Bicycle Parking and End-of-Trip Facilities</b>					



Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
B18	Prior to the issue of the relevant construction certificate, revised drawings showing the staged provision of a minimum of 67 additional bicycle parking spaces must be submitted to and approved by the Planning Secretary.	C	1. Substage 4 Landscape plans_marked up (AJ&C, 8/12/2020) 2. Approval Letter - conditions B2, B3, B4, B5, B18 and D20 (DPE, 15/12/2021) 3. IEA interview	A review of the landscape plans uploaded to the Planning Portal confirmed that the landscape plans had been amended in accordance with the requirements of this condition. The letter from DPE acknowledged the submission of the landscape and architectural plans submitted to the Planning Secretary in accordance with conditions B2, B3, B4, B5, B18 and D20 of SSD 8996, lists the updated plans and relevant consent conditions and includes a statement approving the plans required under these conditions of consent	
B19	Prior to the issue of the relevant construction certificate, the following design details in relation to the secure bicycle parking and end-of-trip facilities must be submitted to the Certifier for approval: (a) 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 ; (b) the provision of end-of-trip facilities for staff in accordance with the Hornsby Development Control Plan 2013.	NT	1. IEA interview	The Auditee confirmed that the construction certificate will be issued at the completion of Stage 1.	
<b>Geotechnical - NorthConnex</b>					
B20	Prior to the issue of the relevant construction certificate for excavation works, the developer must submit design drawings and documents relating to the excavation of the site and support structures to TfNSW for endorsement (in accordance with Technical Direction GTD2012/001 ). The design drawings and documents must demonstrate the proposed Stage 1 works would have no impact to the NorthConnex tunnel and verify that any sub-basement does not encroach on the NorthConnex tunnel envelope.	C	1. Email from TfNSW - Condition B20 Satisfied (27/01/2022) 2. Email from TfNSW no objections for substage 4 to proceed (2/12/2022)	Emails from TfNSW confirmed endorsement and compliance with this condition for substages 1, 2 and 3 and also substage 4..	
<b>PART C PRIOR TO COMMENCEMENT OF CONSTRUCTION</b>					
<b>Notification of Commencement</b>					
C1	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.	C	1. Letter from CTPG to DPI&E dated 17/12/2021. 2. Acknowledgement email from DPI&E 3. SE220007.01 Loreto Normanhurst IEA Report Rev 3 (Epic Environmental, 22/3/2023)	The initial 2022 IEA confirmed that the requirements of this conditions were complied with for substage 1 - 3. The Auditee confirmed that substage 4 is yet to commence, and that notification of the dates intended to commence construction will be submitted in accordance with the requirement of this condition,	
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 date of commencement and the development to be carried out in that stage.	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 04, dated 19 November 2022 2. Approval of revised staging report - 16/12/2022 (DPE). 3. SE220007.01 Loreto Normanhurst IEA Report Rev 3 (Epic Environmental, 22/3/2023) 4. IEA interview	The initial 2022 IEA confirmed that the requirements of this conditions were complied with for substage 1 - 3 An amended Staging Report was submitted and approved by DPE (16/12/22) indicating that construction works for substage 4 were intended to commence in January 2023. The Auditee confirmed that notification for the commencement of stage 4 was yet to be submitted.	
<b>Certified Drawings</b>					
C3	Prior to the commencement of construction for the relevant construction stage, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.	C	1. SE220007.01 Loreto Normanhurst IEA Report Rev 3 (Epic Environmental, 22/3/2023) 2. Emails between CTPG, Blackett Maguire + Goldsmith (date range 10/12/2021 and 16/12/2021). 3. IEA interview	The initial 2022 IEA confirmed that the requirements of this conditions were complied with for substage 1 - 3. The Auditee confirmed that compliance with this condition for substage 4 was in progress at the time of this IEA.	
<b>Photographic Archival Recording</b>					

**Loreto Normanhurst School Redevelopment  
Independent Environmental Audit**

**Determination of a Development Application for State Significant, Development Consent (8996)**

Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
C4	Prior to any demolition and/or alteration works commencing on the site in Stage 1 on the site, archival photographic recordings must be undertaken for significant building fabric and spaces, as specified by a qualified heritage consultant. The archival recordings must specifically include a detailed account of internal and external components of the buildings / spaces and context photographs of the existing site as viewed from the street and its surroundings. A copy of the final recordings must be submitted to the Certifier and Council for information.	NC	1. SE220007.01 Loreto Normanhurst IEA Report Rev 3 (Epic Environmental, 22/3/2023) 2. Photographic Archival Recording - Stage 1 Master Plan Redevelopment Substages 1, 2 and 3, Weir Phillips Heritage and Planning, November 2021 (J5449). 3. Location Plans. 4. Large format photos. 5. Contact Sheets 6. Certifier reports 7. IEA interview	The majority of the requirements of this conditions were complied with for substage 1 - 3, however a copy of the final recordings was not submitted to Council. Substages 1 - 3 were completed at the time of this IEA. The Auditee confirmed that prior to substage 4 - 6, the archival recordings will be provided to Council for information as required by this condition.	NC - 04

<p style="text-align: center;"><b>Loreto Normanhurst School Redevelopment</b>  <b>Independent Environmental Audit</b>  <b>Determination of a Development Application for State Significant, Development Consent (8996)</b></p>					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
<b>Pre-Construction Dilapidation Report - Protection of Public Infrastructure</b>					
C5	Prior to the commencement of construction, the Applicant must: (a) consult with the relevant owner and provider of services and infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non-residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected; (c) submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and (d) provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested.	C	1. Dilapidation Report Loreto Convent School, Normanhurst Loreto Carparks Project prepared by Opal Dilapidations Rev 00 (dated 19/11/2021, Ref: OD2214). 2. Post Approval Form. 3. Example door knock and letter box details 2A Mount Pleasant Avenue (Opal Dilapidation). 4. Email evidence of submission of the dilapidation survey to Hornsby Council on 22/11/21. 5. IEA interview	The requirements of this conditions were complied with for substage 1 - 3 as demonstrated in the dilapidation report, evidence of submission to council, post approval form and letter box letters The Auditee confirmed that the requirements of this condition were in progress at the time of this IEA for substage 4.	
<b>Pre-Construction Survey - Residential Properties</b>					
C6	Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of residential buildings that are likely to be impacted by the relevant construction.	C	1. Dilapidation Report Loreto Convent School, Normanhurst Loreto Carparks Project prepared by Opal Dilapidation Rev 00 (dated 19/11/2021, Ref: OD2214). 2. Example door knock and letter box details 2A Mount Pleasant Avenue (Opal Dilapidation). 3. IEA interview	The requirements of this conditions were complied with for substage 1 - 3 as demonstrated in the dilapidation report, letter box letters . The Auditee confirmed that preconstruction surveys would be offered to property owners prior to the commencement of construction works for substage 4.	
C7	Where the offer for a pre-construction survey is accepted (as required by condition C6), 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.	NT	1. IEA interview	There was no evidence of a pre-construction survey being accepted for substage 1 - 3 was observed during this IEA. The Auditee confirmed that the offer for surveys would be provided to property owners prior to construction of substage 4 commencing.	
C8	Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by condition C6, the Applicant must: (a) provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report; (b) submit a copy of the Pre-Construction Survey Report to the Certifier; and (c) provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.	C	1. SE220007.01 Loreto Normanhurst IEA Report Rev 3 (Epic Environmental, 22/3/2023) 2. Letter from TTW (dated 15 Dec 2021). 3. IEA interview	The requirements of this conditions were complied with for substage 1 - 3 as demonstrated in the pre construction survey report. The Auditee confirmed that preconstruction surveys would be offered to property owners prior to the commencement of construction works for substage 4.	
<b>Development Contributions</b>					

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Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
C9	<p>Prior to the commencement of any construction works, a payment of a levy of 1 % of the proposed cost of carrying out the development in Stage 1 must be paid to Council under section 7.12 of the EP&amp;A Act.</p> <p><b>Note:</b> There are approval requirements for imposing a condition under section 7. 12 in respect of land within a special contributions area.</p>	C	<ol style="list-style-type: none"> <li>1. Cost summary report.</li> <li>2. Hornsby Shire Council Tax receipt/invoice.</li> <li>3. Section 7.12 Development Contributions Plan 2019-2029 (Hornsby Shire Council).</li> <li>4. IEA interview</li> </ol>	<p>Evidence provided confirmed that the requirements of this conditions were complied with for substage 1 - 3</p> <p>The Auditee confirmed that contributions for substage 4 are yet to be finalised and paid.</p>	
<b>Community Communication Strategy</b>					
C10	<p>No later than two weeks before the commencement of any construction, a Community Communication Strategy must be submitted to the Planning Secretary for approval and approved by the Planning Secretary prior to the commencement of construction or within another timeframe agreed with the Planning Secretary. 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. The Community Communication Strategy must:</p> <p>(a) identify people to be consulted during the design and construction phases;</p> <p>(b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development;</p> <p>(c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development;</p> <p>(d) set out procedures and mechanisms:</p> <p>(i) through which the community can discuss or provide feedback to the Applicant;</p> <p>(ii) through which the Applicant will respond to enquiries or feedback from the community; and</p> <p>(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> <p>(e) include any specific requirements around traffic, noise and vibration, visual impacts, amenity, flora and fauna, soil and water, contamination, heritage.</p>	C	<ol style="list-style-type: none"> <li>1. Letter from the Department of Planning, Industry &amp; Environment (DPE, 20/12/2).</li> <li>2. <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a>.</li> <li>3. Community Communications Strategy (Urbis) - 2021.</li> </ol>	<ol style="list-style-type: none"> <li>1. A letter from the DPE details the Community Communication Strategy (CCS) had been received and contained the information required under Condition C10. A review of the CCS confirmed that it complied with the requirements of this condition: <ul style="list-style-type: none"> <li>(a) identify people to be consulted during the design and construction phases (Section 4)</li> <li>(b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development (Section 5.1)</li> <li>(c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development (Section 5.2)</li> <li>(d) set out procedures and mechanisms: <ul style="list-style-type: none"> <li>(i) through which the community can discuss or provide feedback to the Applicant (Section 5)</li> <li>(ii) through which the Applicant will respond to enquiries or feedback from the community (Section 6)</li> <li>(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 (Section 6)noise</li> </ul> </li> <li>(e) include any specific requirements around traffic, noise and vibration, visual impacts, amenity, flora and fauna, soil and water, contamination, heritage (Section 4)</li> </ul> </li> <li>3. Implementation of the CCS was observed on the applicant's website (link to the planning Portal).</li> </ol>	
<b>Community Consultative Committee</b>					
C11	<p>Prior to the commencement of any construction, a Community Consultative Committee (CCC) must be established for the development in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (2016). The CCC must begin to exercise functions in accordance with such guidelines before the commencement of construction and continue to do so for the duration of construction and for at least six months following completion of construction.</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>• The CCC is an advisory committee only.</li> <li>• In accordance with the Guidelines, the Committee should comprise an independent chair and appropriate representation from the Applicant, Council and the local community.</li> </ul>	C	<ol style="list-style-type: none"> <li>1. Letter requesting name change to the CCC (DPE, 13/05/2022)</li> <li>2. <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a></li> </ol>	<p>A community consultative committee (CCC) has been established. Quarterly meetings have been scheduled during the construction works and meeting minutes are advertised on the Applicants website. An independent chair has been nominated for the CCC.</p> <p>A letter from the DPE confirms that it supports the proposed name change for the committee.</p>	

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<b>Demolition</b>					
C12	Prior to the commencement of any construction, demolition work plans required by AS 2601-2001 The demolition of structures (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.	C	1. Demolition Plan, Loreto Normanhurst (Rhino Demolition). 2. Post approval form. 3. IEA interview	The demolition plan included a statement that the Demolition plan has been developed in line with Appendix B of the SafeWork NSW Demolition Work Code of Practice, March 2015. The post approval form for the submission of the demolition plan to DPE was provided	
<b>Environmental Management Plan Requirements</b>					
C13	Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). <b>Notes:</b> • The Environmental Management Plan Guideline is available on the Planning Portal at: <a href="https://www.planningportal.nsw.gov.au/majorprojects/assessments/post-approval">https://www.planningportal.nsw.gov.au/majorprojects/assessments/post-approval</a> • The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans	NC	1. Construction Environment Management Plan (Cowyn Building Group) 2. Loreto Normanhurst Construction Pedestrian and Traffic Management plan (CPTMP) 3. Construction Noise Vibration Management Plan (CNVMP) 4. Construction Soil and Water Management Plan (CSWMP) 5. Construction Waste Management Sub-Plan (CWMP) 6. IEA interview	A review of the CEMP and subplans addressed most of the requirements in the Environmental Management Plan Guideline, however there were several elements that were not addressed, however substages 1 - 3 were complete prior to the final 2022 IEA being submitted to the Planning Secretary, therefore the plans were not amended <b>retrospectively</b> . <b>The Auditee confirmed that substage 4 was yet to be commence and stated that the requirements of this condition will be forwarded to the awarded construction contractors.</b> <del>The Auditee confirmed that prior to the commencement of substages 4 – 6, the CEMP, and subplans yet to be developed will address the requirements of the Environmental Management Plan Guideline: Guideline for Infrastructure Projects.</del>	NC - 05
<b>Construction Environmental Management Plan</b>					
C14	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 include, but not be limited to, the following: (a) Details of: (i) hours of work;	C	1. Construction Environmental Management Plan (CEMP). 2. IEA interview	The CEMP addressed the requirements of this condition for substages 1 - 3. The Auditee confirmed that the CEMP for substage 4 would also be developed in accordance with the requirements of this condition.	
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.	C	1. Construction Certificate Requirements (Blackett Maguire + Goldsmith, 10/12/2021) 2. Post Approval Form (NSW Government) 3. IEA interview	The post approval submissions for the CEMP and associated sub-plans for substage 1 - 3 were observed as part of this IEA. The construction certificate requirements letter indicates that the CEMP was received by the certifier. The Auditee confirmed that construction for substage 4 will not commence prior to approval of the CMEP by the Certifier and submission to the Planning Secretary.	

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Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
C16	<p>A Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced person(s);</p> <p>(b) be prepared in consultation with Council and TfNSW;</p> <p>(c) include details of predicted number of construction vehicle movements per day and detail of vehicle types, noting that vehicle movements are to be minimised during peak periods;</p> <p>(d) include assessment of potential impacts to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works;</p> <p>(e) include details of any cumulative impacts due to ongoing construction works on nearby sites;</p> <p>(f) include 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.</p> <p>(g) detail heavy vehicle routes, access and parking arrangements; (h) detail construction vehicle access arrangements and student/ staff access to the site during construction works to ensure safe operation of the school at all times; and</p> <p>(i) no existing trees are to be removed to facilitate construction works that are not included in the list of trees permitted to be removed as part of this consent.</p>	NC	<p>1. Construction Pedestrian and Traffic Management Plan (CPTMP)</p> <p>2. IEA interviews</p>	<p><del>The majority of the requirements of this Condition were complied with, however 16b) was identified as a NC in the initial 2022 IEA. Sub-condition C16(b) requires for the CPTMP to be prepared in consultation with Council and TfNSW. During this IEA no evidence of such consultation being completed was provided. Substage 1-3 were completed prior to the final IEA being issued to the Planning Secretary, therefore the CTPMSP was not updated retrospectively.</del></p> <p><b>Sub-condition C16(b) was identified as a NC in the initial 2022 IEA.</b></p> <p><b>Sub-condition C16(a) requires the CTPMSP to be prepared in consultation with Council and TfNSW, however no evidence of consultation was provided during this IEA.</b></p> <p><b>Substage 1-3 were complete prior to the initial 2022 IEA being issued to the Planning Secretary, therefore the CTPMSP was not updated retrospectively</b></p> <p>The Auditee confirmed that the CTPMSP developed for substage 4 will be developed in accordance with the requirements of this condition.</p>	<p><b>NC - 01</b></p> <p><b>OFI - 01</b></p>

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Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
C17	<p>The Construction Noise and Vibration Management Sub-Plan (CNVMSP) must address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced noise expert;</p> <p>(b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);</p> <p>(c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</p> <p>(d) describe the measures to be implemented to ensure that the noise generated by the construction activities do not have adverse impacts on the ongoing operation of the school;</p> <p>(e) include details of respite measures to be implemented for high noise generating activities (exceeding 75DBA as measured at the sensitive receiver) including (but not limited to) measures such as:</p> <ul style="list-style-type: none"> <li>• works being undertaken in continuous blocks of no more than 3 hours, with at least a 1-hour respite between each block of work generating high noise impact at the identified sensitive receiver;</li> <li>• respite periods implemented during the day; and</li> <li>• elimination of high noise generating construction works during identified examination times;</li> </ul> <p>(f) include strategies that have been developed with the community for managing high noise generating works;</p> <p>(g) describe the community consultation undertaken to develop the strategies in condition C17(d);</p> <p>(h) include a complaints management system that would be implemented for the duration of the construction; and</p> <p>(i) 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 condition C 13.</p> <p><b>Note:</b> the purposes of this condition 'continuous' includes any period during which there is less than one hour respite between ceasing and recommencing any of the work the subject of this condition.</p>	C	<ol style="list-style-type: none"> <li>1. Construction Noise &amp; Vibration Management Plan (CNVMP)</li> <li>2. IEA interviews</li> </ol>	<p>The CNVMP was reviewed and addressed the requirements of this condition for substage 1 - 3. The Auditee confirmed that the CNVMP for stage 4 would develop and approved in accordance with the requirements of this condition.</p>	
C18	<p>The Applicant must prepare a Construction Soil and Water Management Plan (CSWMP) and the plan must address, but not be limited to the following:</p> <p>(a) be prepared by a suitably qualified expert, in consultation with Council;</p> <p>(b) describe all erosion and sediment controls to be implemented during construction, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils &amp; Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book';</p> <p>(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);</p> <p>(d) detail all off-Site flows from the Site; and</p> <p>(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.</p>	NC	<ol style="list-style-type: none"> <li>1. Construction Soil and Water Management Plan (CSWMP)</li> <li>2. IEA interviews</li> </ol>	<p><del>A review of the CSEMP identified that the majority of the requirements of this condition were complied with, however 18a) was identified as a NC in the initial 2022 IEA. Sub-condition C18(a) requires for the CSWMP to be prepared in consultation with Council, however no evidence of consultation was provided during this IEA.</del></p> <p><b>Sub-condition C18(a) was identified as a NC in the initial 2022 IEA.</b></p> <p><b>Sub-condition C18(a) requires the CSWMP to be prepared in consultation with Council, however no evidence of consultation was provided during this IEA.</b></p> <p><b>Substage 1 -3 were complete prior to the initial 2022 IEA being issued to the Planning Secretary, therefore the CSWMP was not updated retrospectively.</b></p>	NC - 01
C19	<p>The Construction Waste Management Sub-Plan (CWMSMP) must address, but not be limited to, the procedures for the management of waste comprising:</p> <p>(a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use;</p> <p>(b) information regarding the recycling and disposal locations; and</p> <p>(c) confirmation of the contamination status of the development areas of the site based on the validation results.</p>	C	<ol style="list-style-type: none"> <li>1. Construction Waste Management Sub Plan (CWMSMP)</li> <li>2. IEA interviews</li> </ol>	<p>The CSWMP for substage 1- 3 was reviewed as part of the IEA and addressed all matters specified in this condition.</p> <p>The Auditee confirmed that the CSWMP for substage 4 is yet to be developed.</p>	

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Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
C20	A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following: (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.	C	1. Construction Pedestrian and Traffic Management plan (CPTMP). 2. IEA interview	The CPTMP addressed the requirements of this condition for substage 1 - 3. The Auditee confirmed that the CPTMP for stage 4 would develop and approved in accordance with the requirements of this condition.	
<b>Soil and Water</b>					
C21	Prior to the commencement of construction, the Applicant must install erosion and sediment controls and other soil and water management measures in accordance with the CSWMSP (Schedule 3 condition C18).	C	1. Site Inspection (16/03/23) 2. IEA interviews	Substage 1 - 3 were complete at the time of the site inspection and all temporary ESC had been removed. The Auditee confirmed that a site specific ESCP for substage will be developed and all ESC mitigation measures will be implemented in accordance with the requirements of hits condition.	
<b>Construction Worker Transportation Strategy</b>					
C22	Prior to the commencement of any construction, the Applicant must submit a Construction Worker Transportation Strategy to the satisfaction of the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be submitted to the Planning Secretary for information.	C	1. Construction Worker Transportation Strategy (Cowyn Building Group, 16/11/2021). 2. Email dated 7/12/2021 acknowledging receipt of the CWTS (DPI&E). 3. Construction Certificate Requirements (Blackett Maguire + Goldsmith, 10/12/2021)	The requirements of this condition were complied with (included in the CPTMP) for substage 1 - 3: - A copy of the construction worker transport strategy was observed - A copy of the email receipt from DPI&E acknowledging receipt no comments on the document was also observed - The construction certificate requirements letter indicates that the CWTS was received by the certifier and the Planning Secretary. The Auditee confirmed that a new CPTMP and CWTS will be developed for substage 4.	
<b>Biodiversity</b>					
C23	Prior to the commencement of any vegetation clearing, the number and classes of ecosystem credits (like-for-like) set out in the Biodiversity Assessment Method (BAM) Biodiversity Credit Summary Report contained in Appendix G of the Loreto Normanhurst Biodiversity Assessment Report (version 6), prepared by Eco Logical Australia and dated 16 December 2020 must be retired.	C	1. Biodiversity Conservation Trust Statement Confirming payment into the Biodiversity conservation Fund for an offset obligation (10/12/2021).	This requirements of this condition were satisfied during substages 1 -3 and evidence of payment was sighted. The trust statement includes detail of the credit obligations, number of credits and cost per credit.	



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Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
C24	The requirement to retire credits in Schedule 3 condition C23 may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem and species credits.	C	1. Biodiversity Conservation Trust Statement Confirming payment into the Biodiversity conservation Fund for an offset obligation (10/12/2021).	and evidence of payment was - The trust statement includes detail of the credit obligations, number of credits and cost per credit.	
C25	Evidence of the retirement of credits or payment to the Biodiversity Conservation Fund in satisfaction of condition C24 must be provided to the Planning Secretary prior to carrying to commencement of any construction works.	NT	1. Email from DPE to CTPG acknowledging receipt of the Bio-Credit Payment (dated 1 August 2022) 2. SE220007.01 Loreto Normanhurst IEA report Rev 3 (Epic Environmental, 22/03/2023) 3. IEA interview	The retirement of credits or payment to the Biodiversity Conservation Fund were completed outside of this audit period. Note: A review of evidence provided identified the date of the submission of evidence to the Planning Secretary was August 2022 and construction works had commenced prior to the submission of the evidence. This was identified as a NC in the initial IEA, however it was identified as an event in the past with no action that could be applied to address the matter retrospectively. The Planning Secretary was notified of the NC via submission of the 2022 #1 IEA report.	
<b>Outdoor Lighting</b>					
C26	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.	C	1. Letter re: Loreto CC#1 - Condition C26 (Substage 2) LCI Consultants, 29/11/2021. 2. Construction Certificate Requirements (Blackett Maguire + Goldsmith, 24/01/2022) 2. IEA interviews	The LCI letter to CTPG confirms lighting complies with AS1158.3.1 :2005 and AS 4282-2019 and the construction certificate requirements letter indicates that the letter from LCI is accepted (for substage 1-3). The Auditee confirmed that lighting requirements for sb=substage 4 are yet to be submitted for review and certification.	
<b>Ecologically Sustainable Development</b>					
C27	Prior to the commencement of construction for the relevant construction stage, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either: (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.	C	1. Letter Re: Loreto College Normanhurst - SSD 8996 Schedule 3 Condition C27 Conditions for ESD Certification 2. Approval Letter - ESD Certification (14/12/2022)	Evidence provided confirmed that CTPG submitted a request to the DPE for ESD certification in accordance with conditions C27 and F16 of SSD 8996. The letter included the following details - Reference to a 5 star ESD Framework that aligns with current Green Star Design and AS Built v1.3 Tool; proposed documentation satisfying the condition of the consent - alternative ESD certification methodology Preliminary ESD Framework Benefits of an alternative process - comparison to a formal green star rating - consultant involvement - sustainability initiatives The letter from DPE confirmed that it supports the alternative ESD framework and approves the alternative ESD Certification process	
C28	Prior to the commencement of construction for the relevant construction stage, the Applicant must engage a suitably qualified Green Star accredited professional to ensure the ESD measures indicated in the ESD SSDA Report prepared by ARUP and dated 7 January 2019 and the requirements of condition C27 are incorporated into the detailed design of the development.	NT	N/A	This condition is relevant to substage 4 which is yet to commence. the Auditee confirmed that a suitably qualified Green Star accredited professional will be engaged to comply with the requirements of this condition	
<b>Contamination</b>					
C29	Prior to the commencement of any construction, the Applicant must engage a NSW EP 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. Evidence of the appointment of the Site Auditor must be provided to the Certifier prior to the commencement of construction.	C	1. Letter - Enviroreview re: interim site Audit Advice - review and endorsement of additional site investigations comment on update to RAP being not required, Loreto Normanhurst, Stage 1 works area (21/2/2022). 2. Email - from CTPG appointing Enviroreview for the NSW EPA Contaminated Site Auditor Role. 3. Construction Certificate Requirements (Blackett Maguire + Goldsmith, 24/01/2022). 4. IEA interviews	Evidence provided demonstrated compliance with the requirements of this condition for substages 1 - 3: - Email from CTPG appointing Enviroreview as the NSW EP Accredited site auditor. - The construction certificate requirements letter indicates that evidence of the engagement of Enviroreview was accepted. The Auditee confirmed that compliance with this condition for substage 4 was in progress at the time of this IEA	

<p style="text-align: center;"><b>Loreto Normanhurst School Redevelopment</b>  <b>Independent Environmental Audit</b>  <b>Determination of a Development Application for State Significant, Development Consent (8996)</b></p>					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
C30	Prior to the commencement of each construction substage specified in Schedule 3 condition A9 as amended by this development consent), the Applicant must conduct additional site investigations (where relevant to the substage) to confirm the full nature and extent of the contamination in accordance with Section 4 'Data Gap Investigation Requirements' of the Remedial Action Plan (Revision 1), prepared by JK Environments and dated 12/01/2021.	C	1. Letter - Enviroreview re: Interim Site Audit Advice - review and endorsement of additional site investigations comment on update to RAP being not required, Loreto Normanhurst, Stage 1 works area (21/2/2022). 2. Letter - DPI&E Loreto Normanhurst School Redevelopment (SSD 8996_ Contamination, Conditions C30-C33 (22/02/2022).	Evidence provided demonstrated compliance with the requirements of this condition for substages 1 - 3: - The letter form Enviroreview states that based on a review of specified reports and a site investigation conducted for substage area 1-3, that is was unnecessary to update the RAP as no additional contamination /remediation has been identified that hasn't already been addressed. - The letter form DPE confirms that the requirements of conditions C30 - C33 have been met. The Auditee confirmed that compliance with this condition for substage 4 was in progress at the time of this IEA	
C31	The additional site investigations required by Schedule 3 condition C30 must be documented in a report prepared by, or reviewed and endorsed by, a suitably consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.	C	1. Construction Letter - Enviroreview re: Interim Site Audit Advice - review and endorsement of additional site investigations comment on update to RAP being not required, Loreto Normanhurst, Stage 1 works area (21/2/2022). 2. Letter - DPI&E Loreto Normanhurst School Redevelopment (SSD 8996_ Contamination, Conditions C30-C33 (22/02/2022).	Evidence provided demonstrated compliance with the requirements of this condition for substages 1 - 3: - The letter form Enviroreview states that based on a review of specified reports and a site investigation conducted for substage area 1-3, that is was unnecessary to update the RAP as no additional contamination /remediation has been identified that hasn't already been addressed. - The letter form DPE confirms that the requirements of conditions C30 - C33 have been met. The Auditee confirmed that compliance with this condition for substage 4 was in progress at the time of this IEA	
C32	The recommendations of the Remediation Action Plan (RAP) (Revision 1) prepared by JK Environments and dated 12/01/2021 and the unexpected finds procedure must be updated following results of further site investigations and implemented throughout duration of project work as required by Schedule 3 conditions C30 and C31. The updated RAP must be endorsed by the same consultant as specified in Schedule 3 condition C30.	C	1. Letter - Enviroreview re: Interim Site Audit Advice - review and endorsement of additional site investigations comment on update to RAP being not required, Loreto Normanhurst, Stage 1 works area (21/2/2022). 2. Letter - DPI&E Loreto Normanhurst School Redevelopment (SSD 8996_ Contamination, Conditions C30-C33 (22/02/2022).	Evidence provided demonstrated compliance with the requirements of this condition for substages 1 - 3: - The letter form Enviroreview states that based on a review of specified reports and a site investigation conducted for substage area 1-3, that is was unnecessary to update the RAP as no additional contamination /remediation has been identified that hasn't already been addressed. - The letter form DPE confirms that the requirements of conditions C30 - C33 have been met. The Auditee confirmed that compliance with this condition for substage 4 was in progress at the time of this IEA	
C33	The site investigation report, required in Schedule 3 condition C31, the amended RAP in Schedule 3 condition C32 and the relevant certification must be submitted to the satisfaction of the Planning Secretary at least 4 weeks prior to the commencement of any construction for the relevant substage. A copy of the Planning Secretary's approval must be submitted to the Certifier for information prior to the commencement of construction of each relevant substage.	C	1. Letter - DPI&E Loreto Normanhurst School Redevelopment (SSD 8996_ Contamination, Conditions C30-C33 (22/02/2022). 2. Construction Certificate Requirements (Blackett Maguire + Goldsmith, 24/01/2022). 3. IEA interviews	The letter form Enviroreview states that based on a review of specified reports and a site investigation conducted for substage area 1-3, that is was unnecessary to update the RAP as no additional contamination /remediation has been identified that hasn't already been addressed. The letter form DPE confirms that the requirements of conditions C30 - C33 have been met. The Auditee confirmed that compliance with this condition for substage 4 was in progress at the time of this IEA	
<b>2</b>					
C34	Prior to the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	C	1.Hornsby Shire Council approval of the stormwater connection (dated 14/12/2021, ref SD/32/2021). 2. IEA interviews	Stormwater design drawings for the site stamped approved by the Hornsby Shire Council were provided during the IEA for substage 1 - 3. The Auditee confirmed that approvals process for substage 4 was in progress at the time of this IEA	
C35	Prior to the commencement of construction written advice must be obtained from the relevant utility providers / authorities (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.	C	1.Hornsby Shire Council approval of the stormwater connection (dated 14/12/2021, ref SD/32/2021). 2. IEA interviews	Written approval from the Hornsby Shire Council was observed during the IEA for substage 1 - 3. The Auditee confirmed that approvals process for substage 4 was in progress at the time of this IEA	
<b>Notification of excavation</b>					
C36	If it is necessary to excavate below the level of the base of the footings of the adjoining roadways, the Applicant must ensure that the relevant roads authority is/are given at least seven (7) day notice of the intention to excavate below the base of the footings. The notice is to include complete details of the work.	NT	N/A	No excavation required within the roadway.	

**Loreto Normanhurst School Redevelopment  
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Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
<b>PART D DURING CONSTRUCTION</b>					
<b>Site Notice</b>					
D1	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: (a) minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A 1) 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.	C	1. Site Inspection (16/03/23). 2.SE220007.01 Loreto Normanhurst IEA report Rev 3 (Epic Environmental, 22/03/2023)	Construction signage related to substage 3 and 4 had been removed as works had been completed at the time of the site inspection. A review of the initial 2022 IEA confirmed compliance with this condition during construction of substages 1 - 3., Although construction of substage 4 is yet to commence, observation made during the site inspection of the location of substage 4 confirmed that appropriate signage has been placed on there fencing and gate for no entry and "construction site".	
<b>Operation of Plant and Equipment</b>					
D2	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.	C	1. Site Inspection (16/03/23). 2.SE220007.01 Loreto Normanhurst IEA report Rev 3 (Epic Environmental, 22/03/2023)	Substage 1 - 3 were complete at the time of the site inspection and all equipment and machinery had been removed off site. A review of the initial 2022 IEA confirmed compliance with this condition during construction works.	
<b>Demolition</b>					
D3	Demolition work must comply with the demolition work plans required by Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001) and endorsed by a suitably qualified person as required by Schedule 3 condition C12.	C	1. Demolition Plan, Loreto Normanhurst (Rhino Demolition). 2. Post approval form.	The demolition plan (prepared by a person holding a demolition license) included a statement that the Demolition plan had been developed in line with Appendix B of the SafeWork NSW Demolition Work Code of Practice, March 2015.	
<b>Construction Hours</b>					
D4	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 5pm, Mondays to Fridays inclusive; and (b) between 8am and 1 pm, Saturdays. No work may be carried out on Sundays or public holidays.	C	1.SE220007.01 Loreto Normanhurst IEA report Rev 3 (Epic Environmental, 22/03/2023) 2.IEA interviews	Substage 1 - 3 were complete at the time of the site inspection. A review of the initial 2022 IEA confirmed compliance with this condition during construction works for substage 1 -3. The Auditee confirmed that this condition will be addressed in the Camps and relevant subplans for substage 4.	
D5	Construction activities may be undertaken outside of the hours in Schedule 3 condition D4 if required: (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or (c) where a variation is approved in advance in writing by the Planning Secretary or their nominee if appropriate justification is provided for the works.	NT	1. IEA interviews	The Auditee confirmed that there had been no out of hours works undertaken to date	
D6	Notification of such construction activities as referenced in Schedule 3 condition D5 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	NT	1. IEA interviews	The Auditee confirmed that there had been no out of hours works undertaken to date	

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Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
D7	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: (a) 9am to 12pm, Monday to Friday; (b) 2pm to 5pm Monday to Friday; and (c) 9am to 12pm, Saturday.	C	1. Construction Pedestrian and Traffic Management Plan Rev A Ref 004RP/2021 (ttpa, December 2021). 2. Construction Environmental Management Plan v.1.0 (Cowyn Building Group). 3. Construction noise and vibration management plan (NJ Child & Associates, 2021).	Reference to work hours for specific noisy activities for substage s 1 - 3 were outlined in: '- CPTMP: Section 4.3 - CEMP: Table 4.6: Noise (statement that work hours are in accordance with the relevant authority approval). The Auditee confirmed that this condition will be addressed in the management plans to be developed as part of substage 4.	
D8	Construction of the P4A Osborn Road and the through site road and associated works must be undertaken outside the school term dates or outside the AM and PM peak pick-up/drop-off times.	NT	N/A	Construction of the P4A Osborn Road carpark had completed prior to the date of the IEA.	
<b>Implementation of Management Plans</b>					
D9	The Applicant must carry out the construction of the development in accordance with the most recent version of the submitted CEMP (including Sub-Plans).	NC	1. Loreto Normanhurst SSD8996 Staging Report Rev 03, dated 7 December 2021. 2. Construction Environmental Management Plan v.1.0 (Cowyn Building Group). 3. Site inspection. 4. IEA interviews	Implementation of the CEMP and associated sub-plans identified the following NCs:- <b>The initial 2022 IEA identified NC's for the Implementation of the CEMP and associated sub-plans:</b> • One element of the CSWMP not implemented • One element of the CPTMP not implemented • Two elements of the CNVMP not implemented Substage 1 - 3 were complete at the time of the submission of the IEA to the Planning Secretary, therefore the relevant management plans did not undergo a review and update, <b>nor did confirmation the required updates were implemented on site.</b>	<b>NC - 06 NC - 07 NC - 08</b>
<b>Construction Traffic</b>					
D10	All construction vehicles (excluding site personnel 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.	C	Site inspection (16/3/2023).	Construction for substage 1 -3 were complete at the time of this IEA. Observations made during the site inspection confirmed that there were no construction vehicles located at the site. The requirements of this condition will be addressed in substage 4.	
D11	The following hoarding requirements must be complied with: (a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and (b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application.	C	Site inspection (16/3/2023).	No third party advertisement or graffiti was observed during the site inspection for the areas related to substages 1 - 4	
<b>No Obstruction of Public Way</b>					
D12	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.	C	Site inspection (16/3/2023) 2. IEA interviews	Construction for substage 1 -3 were complete at the time of this IEA. The Auditee confirmed that this will be addressed in relevant documentation for substage 4.	
<b>Construction Noise Limits</b>					
D13	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 in Schedule 3 condition C17.	C	1. Construction Noise & Vibration Management Plan v.1(N.G Child & Associates, 26/11/2021). 2. IEA interviews	A review of the Construction Noise & Vibration Management Plan for substage 1 - 3 confirmed all feasible and reasonable noise mitigation measures were included in the plan. The Auditee confirmed that a CNVMP will be developed submitted for approval for substage 4 prior to works commencing.	

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Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
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 outlined under Schedule 3 condition D4.	C	1. Construction Environmental Management Plan v.1.0 (Cowyn Building Group). 2. Construction Pedestrian and Traffic Management Plan Rev A Ref 004RP/2021 (ttpa, December 2021). 3. Construction Noise & Vibration	The appropriate reference to work hours including delivery of materials to and from site for substage 1- 3 were outlined in: - CPTMP: Section 4.3 - CEMP: Section 2.3 The Auditee confirmed that this condition will be address in the relevant management plans for substage 4.	
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.	C	1. Construction Noise & Vibration Management Plan v.1(N.G Child & Associates, 26/11/2021). 2. IEA interviews	Table 4.1 General Noise Impact Mitigation Control and Action Measures includes reference to ensure all equipment is equipped with appreciate noise control for works associated with substages 1- 3. The Auditee confirmed that this condition will be addressed in the relevant management plans for substage 4.	
<b>Vibration Criteria</b>					
D16	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time).	C	1. Construction Noise & Vibration Management Plan (CNVMP_ v.1(N.G Child & Associates, 26/11/2021). 2. IEA interviews	The CVMP for substage 1 - 3 references noise limits sourced from the NSW Industrial Noise Policy, Noise Policy for Industry (2017), which is different to the standards prescribed in the condition. The Auditee confirmed that no vibration monitoring was been triggered by the scope of works. The Auditee confirmed that this will be addressed for substage 4 prior to work commencing	
D17	Vibratory compactors must not be used closer than 30m from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition D16.	C	1. Construction Noise & Vibration Management Plan v.1(N.G Child & Associates, 26/11/2021). 2. IEA interviews	There was no evidence of vibratory compactors being used within sub-stages 1A, 1B and 1C to complete the works. The Auditee confirmed this condition will be addressed in the CNVMP to be developed for substage 4.	
D18	The limits in Schedule 3 conditions D16 and D17 apply unless otherwise outlined in the CNVMSP required by Schedule 3 condition C17.	NT	N/A	Application of this condition has been audited under D16 & D17.	
<b>Tree Protection</b>					
D19	For the duration of the construction works: (a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; (b) all street trees immediately adjacent to the approved disturbance area/ property boundary/is 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 Reports (Boarding Accommodation) and (Car Parks and Through Site Link), prepared by Earthscape Horticultural Services and dated January 2021, as amended by Schedule 3 conditions B2 and B3; and (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.	C	1. Arboricultural Impact Assessment Report Concept Master Plan Detailed Stage 1 Works car parks and through site link (Eandscape Horticultural Service, January 2021). 2. Letter - Approved Development (car Parks and through site link) - SSD8996 Compliance Statement (Eandscape Horticultural Service, 31/12/2021). 3. Site inspection (16/3/2023). 4. IEA interviews	Construction works for substage 1 - 3 were complete at the time of this IEA. The 2022 IEA confirmed tat the requirements of this condition ad been complied with : - Based on the content of the Compliance Statement and the IEA site inspection, the stages 1 - 3 comply with the requirements of this condition: a) street trees had not been trimmed or removed. b) tree protection fencing installed. c) tree protection fencing installed. d) an arborist has been engaged and is available for access to the tree protection area. The Auditee confirmed that an Arborist will be engaged for substage 4 to ensure compliance with the requirements of this condition	
<b>Tree Hollows / Nest Boxes</b>					
D20	Any trees on-site approved for removal that have hollows must be retained in part as ground fauna habitat or used as replacement hollows and attached to trees within the site. If it is not feasible to use salvaged hollows as replacement tree hollows, an artificial nest box must be installed to replace the loss of each tree hollow at a minimum ratio of 1 :.1. Details of the artificial nest box/es for targeted species must be approved in writing by a suitably qualified ecologist and included in the Landscape Plans required under Schedule 3 condition B5.	C	Letters from Eco Logical: 1. 14/1/2022 - Pre-clearance survey Stage 1 2. 18/1/2022 - Clearing supervision Stage 1 3. 2/2/2022 - Nest box installation Stage 1 4. IEA interviews	The evidence supplied confirmed the following: 1. Pre-clearance survey - undertaken 6/1/2022 on trees to be removed. One tree identified with 2 hollows - two nest boxes to be installed. Photos observed. 2. Clearing supervision - Tree hollow containing a Brushtail possum carefully felled and relocated outside of worksite. Photos observed. 3. Nest box installation - detail of each nest box and location provided. Photos observed.	
<b>Air Quality</b>					

**Loreto Normanhurst School Redevelopment  
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Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
D21	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	C	1. Site inspection (16/03/23).	Substages 1 - 3 were complete at the time of this IEA and substage 4 construction was yet to commence. There was no evidence of dust nuisance during the site inspection as all areas of construction and landscaping has been completed. The work area for substage 4 has been cleared and geofab had been installed on all exposed areas. Construction is yet to commence for substage 4, therefore there was no truck activity occurring at the time of the site inspection. during the site inspection all reasonable and practicable measures were observed to minimise the dust generated by the Project.	
D22	During construction, the Applicant must ensure that: (a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	C	1. Site inspection (16/03/23).	Substages 1 - 3 were complete at the time of this IEA and substage 4 construction was yet to commence. There was no evidence of dust nuisance during the site inspection as all areas of construction and landscaping has been completed. The work area for substage 4 has been cleared and geofab had been installed on all exposed areas. Construction is yet to commence for substage 4, therefore there was no truck activity occurring at the time of the site inspection. during the site inspection all reasonable and practicable measures were observed to minimise the dust generated by the Project.	

**Erosion and Sediment Control**

Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
D23	All erosion and sediment control measures must be effectively implemented and maintained in accordance with the CSWMSP (Schedule 3 condition C17).	C	1. Site inspection (16/03/23) 2. IEA interviews	Substages 1 - 3 were complete at the time of this IEA and all ESC control measures had been removed. The work area for substage 4 has been cleared and geofab had been installed on all exposed areas. Construction is yet to commence for substage 4, therefore there was no truck activity occurring at the time of the site inspection. The Auditee confirmed that an ESCP will be developed for substage 4.	
<b>Imported Soil</b>					
D24	The Applicant must: (a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Certifier upon request.	NT	N/A	No imported soil has been received on to the site for the Project for substage 1 - 3. Substage 4 is yet to commence.	
<b>Disposal of Seepage and Stormwater</b>					
D25	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.	NT	N/A	Construction for sub-stage 4 is yet to commence.	
<b>Emergency Management</b>					
D26	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.	C	1. Construction Management Plan Through Link Walkways P1A & Tennis Courts (Rev 3, 04/02/2022) - Site Layout Figure 2. Induction Sign on form (blank). 3. SMP 3.3 - Site induction record form (blank) 4. Induction record (excerpt) 5. Emergency management plan. 6. IEA interview	Evidence provided demonstrated compliance with the requirements of this condition for substages 1 - 3: - Training records provided during the IEA included name, contact details, company, date inducted, by who, and any actions required - Induction sign on forms provided which included details regarding the site WHSE&Q MP, obligations and responsibilities, SWMS, toolbox meetings PPE, emergency evacuation and first aid, environmental protection, operating hours, project rules and construction figures that included emergency evacuation points The Auditee confirmed that the induction training will be updated to reflect the site specific details for substage 4 prior to commencement of works.	
<b>Unexpected Finds Protocol - Aboriginal Heritage</b>					
D27	In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site must be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by EES Group and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and EES Group to develop and implement management strategies for all objects/sites. Works must only recommence with the written approval of EES Group.	C	1. Construction Environmental Management Plan v.1.0 (Cowyn Building Group). 2. IEA interviews	The CEMP for substage 1- 3 measures to be implemented in the event of an unexpectant find. The Auditee confirmed that there were no unexpectant finds during construction activities for substages 1 - 3. The Auditee confirmed that an unexpected finds protocol for both Aboriginal Heritage and Historic Heritage will be included in the revenant management plans yet to be developed for substage 4	
<b>Unexpected Finds Protocol - Historic Heritage</b>					
D28	If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and Heritage NSW contacted. 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. Works must only recommence with the written approval of Heritage NSW.	C	1. Construction Environmental Management Plan v.1.0 (Cowyn Building Group). 2. IEA interviews	The CEMP for substage 1- 3 measures to be implemented in the event of an unexpectant find. The Auditee confirmed that there were no unexpectant finds during construction activities for substages 1 - 3. The Auditee confirmed that an unexpected finds protocol for both Aboriginal Heritage and Historic Heritage will be included in the revenant management plans yet to be developed for substage 4	
<b>Waste Storage and Processing</b>					
D29	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 neighbouring public or private properties.	C	1. Site inspection (16/03/2023).	Substages 1 - 3 were complete at the time of this IEA and substage 4 was yet to commence. There was no evidence of any construction waste remaining onsite during the site inspection.	

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Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
D30	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	C	1. Register waste spreadsheet 2. IEA interviews	The contractors waste register was reviewed for substage 1- 3 and confirmed that it tracked and classified waste types collected and disposed of from the site. The waste register classified the following waste streams: - Asbestos containing material - Virgin excavated natural material - Construction and demolition waste The Auditee confirmed that the contractor engaged of substage 4 will be notified of the requirements of this condition.	
D31	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	C	1. Site inspection (16/03/2023).	There was no evidence of concrete wash water observed on the site during the site inspection	
D32	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.	NC	1. Register waste spreadsheet.	An up to date register identified segregated waste that was collected and transported off-site was provided during the IEA. It is not clear from reviewing the waste register what was is earmarked for re-use or recycling	NC - 06
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.	C	1. Construction Environmental Management Plan v.1.0 (Cowyn Building Group).	A review of the CEMP for Substages 1-3 confirmed that suitable controls were detailed to control the disposal of hazardous material.	
<b>Outdoor Lighting</b>					
D34	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.	C	1. Letter re: Loreto CC#1 - Condition C26 (Substage 2) LCI Consultants, 29/11/2021. 2. Construction Certificate Requirements (Blackett Maguire + Goldsmith, 24/01/2022). 3. IEA interviews	The LCI letter to CTPG confirms lighting for substages 1 - 3 complies with AS1158.3.1 :2005 and AS 4282-2019. The construction certificate requirements letter indicates that the letter from LCI is accepted. The Auditee confirmed that this condition will be addressed for substage 4 once construction is complete.	
<b>Site Contamination</b>					
D35	Remediation of the site must be carried out in accordance with the RAP and any variations to the RAP approved by an NSW EPA-accredited Site Auditor, as amended by this development consent.	C	1. Letter: Interim Site Audit Advice - review and endorsement of revised supplementary Contamination Assessment and comment on the RAP Addendum Methodology Letter, Stage 1 works area site (Enviroreview, 16/03/2023) 2. Letter: Site remediation and validation within stage 1A Redevelopment portion of Loreto Normanhurst School (Sydney Environmental Group, 6/03/2023) 3. Supplementary Contamination Assessment (Sydney Environmental Group, 3/03/2023) 4. Letter: Response to i=Interim Site Audit Advice (IA 0301-20122-06) (Sydney Environmental Group, 3/03/2023) 5.IEA interviews	The letter from Enviroreview and subsequent supervision of the remediation, confirmed remediation was undertaken in accordance with the RAP (as updated by the site audit interim advice 0301-2122-06). The Auditee confirmed that a validation report had not been completed at the time of this audit	



<p style="text-align: center;"><b>Loreto Normanhurst School Redevelopment</b>  <b>Independent Environmental Audit</b>  <b>Determination of a Development Application for State Significant, Development Consent (8996)</b></p>					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
D36	If work is to be carried out/ completed in stages, a NSW EPA-accredited Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice(s).	NT	1. Letter: Interim Site Audit Advice - review and endorsement of revised supplementary Contamination Assessment and comment on the RAP Addendum Methodology Letter, Stage 1 works area site (Enviroreview, 16/03/2023) 2. Letter: Site remediation and validation within stage 1A Redevelopment portion of Loreto Normanhurst School (Sydney Environmental Group, 6/03/2023) 3. Supplementary Contamination Assessment (Sydney Environmental Group, 3/03/2023) 4. Letter: Response to i=Interim Site Audit Advice (IA 0301-20122-06) (Sydney Environmental Group, 3/03/2023) 5. IEA interviews	The letter from Enviroreview and subsequent supervision of the remediation, confirmed remediation was undertaken in accordance with the RAP (as updated by the site audit interim advice 0301-2122-06). The Auditee confirmed that a validation report had not been completed at the time of this audit	
<b>Independent Environmental Audit</b>					
D37	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an Independent Audit Program or commencement of an Independent Audit.	C	1. Letter - Loreto Normanhurst School Redevelopment (SSDD 8996) Appointment of Independent Audit Team (DPE, 1/3/2023).	Letter confirming Kirsty Douglas (lead auditor), Christopher Griffiths (assistant auditor) and Romin Nejad (audit support and technical reviewer) are suitably qualified and experienced to undertake the independent audit.	
D38	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	NC	1. SE220007.01 Loreto Normanhurst IEA report Rev 3 (Epic Environmental, 22/03/2023)	The method for the initial 2022 IEA undertaken by Epic Environmental was developed and executed <b>generally</b> in accordance with the Independent Audit Post Approval Requirements (2020). In accordance with Table 1 of the Independent Audit Post Approval Requirements (2020), the initial IEA is required to be undertaken within 12 weeks of the commencement of construction (14 March 2022), however it was undertaken 16 June 2022 and therefore after the deadline prescribed in Table 1 of the Independent Audit Post Approval Requirements (2020).	<b>NC - 09</b>
D39	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those agreed to above, upon giving at least 4 weeks' notice to the applicant of the date or timing upon which the audit must be commenced.	NT	N/A	The Planning Secretary did not request additional audits outside of the schedule identified in the Independent Audit Post Approval Requirements (2020). NB: The Planning Secretary completed a review of the 2020 IEA and requested several findings be reassess/further clarification and /or justification be provided. All of the review comments were addressed by Epic Environmental and CTPG.	
D40	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under Schedule 3 condition D38 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 after submission to the Planning Secretary.	NC	1. Email correspondence requesting additional information (DPE, 17/02/2023 and 21/03/2023) 2. SE 220007.01 Loreto Normanhurst IEA Report Rev 3 (Epic Environmental, 22/03/2023) 3. IEA interview	The initial 2022 IEA Report was submitted to the Planning Secretary, however no evidence of it being submitted to the certifier was obtained during this IEA. The initial 2022 IEA Report was not made publicly available within 60 days after submission to the Planning Secretary (submitted October 2022) Note: the Planning Secretary requested additional information in February and March 2023. Based on these dates, the IEA is to be made publicly available in May 2023. This IEA is to be made publicly available in July 2023.	<b>NC-10</b>
D41	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 Requirements (2020), unless otherwise agreed by the Planning Secretary.	NC	1. Email correspondence requesting additional information (DPE, 17/02/2023 and 21/03/2023) 2. SE 220007.01 Loreto Normanhurst IEA Report Rev 3 (Epic Environmental, 22/03/2023) 3. IEA interview	The initial 2022 IEA Report was submitted to the Planning Secretary outside of the required timeframe prescribed in the Independent Audit Post Approval Requirements (2020).	<b>NC-11</b>
D42	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.	NT	N/A	The Planning Secretary has not enacted this condition	
<b>PART E: PRIOR TO THE ISSUE OF OCCUPATION CERTIFICATE / COMMENCEMENT OF OPERATION</b>					
<b>Notification of Occupation</b>					

<p style="text-align: center;"><b>Loreto Normanhurst School Redevelopment</b>  <b>Independent Environmental Audit</b>  Determination of a Development Application for State Significant, Development Consent (8996)</p>					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
E1	At least one month before the issue of the occupation certificate for the relevant stage, the date of commencement of the operation of the development must be notified to the Planning Secretary in writing. If the operation of the development is to be staged, the Planning Secretary must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	C	1. Letter -Loreto Normanhurst School Redevelopment (SSD8996) - Schedule 2 Condition E1 - Notification of Operation (CTPG, 29/7/2022) 2. IEA interviews	The letter to the DPE confirms that proposed date for the commencement of operation of stage 1 substages 1 - 3 as the 29 September 2022.	
<b>External Walls and Cladding</b>					
E2	Prior to the issue of the occupation certificate for the relevant stage, the Applicant must provide the Certifier with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.	NT	1. Audit interviews	This condition relates to buildings with cladding components, therefore, this condition will be triggered at the completion of substage 4, as Substages 1 - 3 do not have any buildings which would trigger this requirement.	
E3	The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	NT	1. Audit interviews	This condition will be triggered at the completion of substahge4 for the Boarding house.	
<b>Post Construction Dilapidation Report - Protection of Public Infrastructure</b>					
E4	Prior to the commencement of operation, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must: (a) ascertain whether the construction works created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition C5 of this consent; (b) have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads). (c) be submitted to the Certifier; (d) be forwarded to Council for information; and (e) be provided to the Planning Secretary when requested.	NT	1. IEA interviews	The Auditee confirmed that a post construction dilapidation survey was in progress at the time of this IEA. The report will be published on the Loreto project website once available.	
<b>Repair of Public Infrastructure</b>					
E5	Unless the Applicant and the relevant public authority agree otherwise, the Applicant must, prior to the commencement of operation: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the construction works; and/or (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development. Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions payable under this consent.	NT	NA	This will be determined once the dilapidation report required under condition E4 is complete.	
<b>Post Construction Survey - Residential Properties</b>					
E6	Where a pre-construction survey has been undertaken in accordance with condition C6, prior to the commencement of operation the Applicant must engage a suitably qualified and experienced expert to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must: (a) document the results of the post-construction survey and compare it with the pre-construction survey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition C7; (b) be provided to the owner of the relevant buildings surveyed; (c) be provider to the Certifier; and (d) be provided to the Planning Secretary when requested.	NT	NA	There was no evidence of pre-construction surveys being accepted for substage 1 - 3 (under condition C6) was observed during this IEA. Post construction surveys for residential properties not triggered.	
E7	Where the Post-Construction Survey Report determines that damage to the identified property occurred as a result of the construction works, the Applicant must repair, or pay the full costs associated with repairing the damaged buildings, within an agreed timeline between the owner of the identified property and the Planning Secretary	NT	NA	There was no evidence of pre-construction surveys being accepted for substage 1 - 3 (under condition C6) was observed during this IEA. Post construction surveys for residential properties not triggered	
<b>Utilities and Services</b>					
E8	Prior to the issue of the occupation certificate for the relevant stage, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the <i>Sydney Water Act 1994</i> .	NT	1. Audit interviews	There were no water and sewerage works as part of substages 1-3, only stormwater. The Auditee confirmed that this will be triggered at the completion of Substage 4 for the boarding house.	
<b>Works as Executed Plans</b>					

Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
E9	Prior to the issue of the occupation certificate for the relevant stage, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifier.	C	1. IFC Drawings (TTW 3/12/2021) - signed off by Veris (plan date 14/09/2022) 2. LCI Consultants - Hydraulic Services Inground Drainage Plan H1200 Rev C1 (7/12/2021) - signed off by Veris (plan date 14/09/2022) 3. Construction Certificate CC-21198 (Blackett Maguire + Goldsmith, 17/12/2021) 4. Construction Certificate CC-22014 (Blackett Maguire + Goldsmith, 24/02/2022) 5. Occupation Certificate OCC-22128 (Blackett Maguire + Goldsmith, 20/10/2022) 6. Occupation Certificate OCC-22169 (Blackett Maguire + Goldsmith, 22/11/2022)	Issued for Construction Drawings for siteworks and pavement and drainage for substages 1 - 3 have been signed off by a registered surveyor. The construction and occupation certificates include a list of documentation that was relied upon in issuing the certificates. This included details pertaining to stormwater drainage.	
<b>Green Travel Plan (GTP)</b>					
E10	Prior to the issue of first occupation certificate which permits an increase in student and staff numbers, the applicant must update the GTP in consultation with TfNSW with an Implementation Strategy that commits to specific management actions, including operational procedures to be implemented along with timeframes. The GTP must include, but not be limited to: (a) be prepared by a suitably qualified traffic consultant; (b) analysis of current travel survey data and school postcode data and discussion of how this data has informed the mode share targets and actions of the GTP; (c) identify the number of staff and students within reasonable walking / cycling distance; (d) specific tools and actions to help achieve the objectives and mode share target of 5.1% reduction in staff car trips and 11.4% for students; (e) an implementation strategy that commits to specific actions (including operational procedures to be implemented along with timeframes) to encourage the use of public and active transport and discourage the use of single occupant car travel to access the site; (f) details of bicycle parking and dedicated end of trip facilities including but not limited to lockers, showers and change rooms and e-bike charging station(s) for staff and students to support an increase in the non-car mode share for travel to and from the site; (g) a Transport Access Guide for staff, students and visitors providing information about the range of travel modes, access arrangements and supporting facilities that service the site; (h) a communication strategy for engaging with students, staff and visitors regarding public and active transport use to the site and the promotion of the health and wellbeing benefits of active and non-car travel to the site; (i) include a mechanism to monitor the effectiveness of the measures of the plan; and (j) the appointment of a Travel Plan Coordinator responsible for implementing the plan and its ongoing monitoring and review, including the delivery of actions and associated mode share targets. Note: The applicant must submit a copy of the plan for the endorsement of TfNSW via development.sco@transport.nsw.gov.au, prior to the issue of the occupation certificate.	C	1. Green Travel Plan - Loreto Normanhurst Master Plan (TTW, 10/08/2022) 2. Occupation Certificate OC 22128 (Blackett Maguire + Goldsmith, 20/10/2022) 3. Email - GTP review (TfNSW, 12/10/2022).	The GTP generally complies with the requirements of this conditions: a) the report has been prepared by a qualified traffic engineers and authorised by Paul Yannoulatos (signed on page 4). b) Section 3.0 details the 2018 travel mode survey data with a summary of the results in Table 3.1; Section 3.1.2 outlines the 2022 updated travel mode survey detail with a summary of the results in Tables 3.2. 3.3 and 3.4. Location data is outlined in Section 3.2 The targets are discussed in section 5. c) Cycling / walking catchment tis addressed in section 3.3. d) Specific actions are discussed in section 6. Section 6.6 includes an action checklist. e) Strategies are discusses din Section 6: - 6.1 Strategy 1: enable informed users - 6.2 Strategy 2: Encourage active transport - 6.3 Strategy 3: Encourage public transport - 6.4 Strategy 4: Encourage car pooling - 6.5 Strategy 5: Ongoing management f) Bicycle facilities and end of trip faculties are discussed in sections 2.2.2 and 6.2.2 g) The Transport Access Guide is attached to the GTP in Appendix A h) Section 6.1 includes details regarding how to engage students/staff / visitors regarding access to the site including recommending: - uploading the Transport Access Guide (TAG) to the website - Inductions for new starters - Periodic reminder (e.g. in newsletters) i) Section 6.5 outlines the requirements to undertake regular reviews of the GTP j) The travel coordinator details are included in Section 7  Email evidence provided confirmed that the GTP was submitted to TfNSW for review and comment.	
<b>Operational Transport and Access Management Plan (OTAMP)</b>					

**Loreto Normanhurst School Redevelopment  
Independent Environmental Audit**

**Determination of a Development Application for State Significant, Development Consent (8996)**

Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
E11	<p>Prior to the issue of the occupation certificate for the through site road, new carparks and drop-off/pick-up facilities, an OTAMP must be prepared by a suitably qualified person, in consultation with Council and TfNSW, and submitted to the satisfaction of the Certifier. The OTAMP must address the following:</p> <p>(a) the recommendations and commitments within the document titled ref: 181202 TAAB, prepared by Taylor Thomson Whitting and dated 8 December 2020 (as amended by this consent);</p> <p>(b) detailed pedestrian analysis including the identification of safe route options to identify the need for management measures such as staggered school start and finish times to ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish;</p> <p>(c) the location of all car parking spaces on the school campuses and their allocation (i.e. staff, visitor, accessible, emergency, etc.);</p> <p>(d) the access and security arrangements of the boarding accommodation basement car park including clarification of how:</p> <p>(i) school staff and students not residing at the boarding accommodation are provided safe access to the car and bicycle parking within the building; and</p> <p>(ii) unauthorised access of the boarding accommodation basement would be prevented;</p> <p>(e) the operation of the pick-up/drop-off facilities confirming that all facilities would be open and allow access for on-site vehicle queuing at least 30 minutes prior to the afternoon school pick-up period commencing each day;</p> <p>(f) the location and operational management procedures of the pick-up and drop-off parking located within the project site, including staff management/traffic controller arrangements;</p> <p>(g) delivery and services vehicle and bus access and management arrangements;</p> <p>(h) management of approved access arrangements;</p> <p>(i) potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing pick-up and drop-off parking in the project site;</p> <p>(j) car parking arrangements and management associated with attendance at the school by staff, parents and persons associated with the school to ensure no parking occurs on Osborn</p> <p>(k) monitoring of Mount Pleasant Avenue and Osborn Road by traffic marshals and/or staff during peak periods to ensure pick-up/drop-off does not occur on these roads;</p> <p>(l) booking system / management of the tandem car parking spaces;</p> <p>(m) car parking arrangements and management associated with the proposed use of school facilities by community members; and</p> <p>(n) a monitoring and review program.</p>	C	<p>1. Operational Transport and Access Management Plan - Loreto Normanhurst Master Plan (TWW, 9/08/2022)</p> <p>2. Occupation Certificate OC 22128 (Blackett Maguire + Goldsmith, 20/10/2022)</p> <p>3. Email - GTP review (TfNSW, 12/10/2022).</p>	<p>The OTAMP generally demonstrates compliance with the requirements of this condition.</p> <p>a) A statement is included in Section 1.4 that the OTAMP has been prepared (and updated) by TTW in accordance with condition E11 and that the recommendations and commitments within the doc titled ref: 181202 TAAB have been reference during the preparation of the updated OTAMP</p> <p>b) Details for pedestrian analysis are outlined in Section 5.2; section 5.3 outlines ingress and egress routes, management during arrival and departure, section 5.4 includes management strategies</p> <p>c) Section 6 outlines car park management. Section 6.1 identifies priority routes, Figure 6.1 identifies the car parking areas and Section 6.2 discusses allocation of spaces and ingress/egress routes</p> <p>d) Substage 4 Boarding accommodation is yet to commence, access details will be developed and confirmed during detailed design</p> <p>e) Section 4 addresses pick up and drop off management. Section 4.2.1 details that drop off/pick up areas will be open 30 mins prior to school finish times to allow internal queuing</p> <p>f) Section 4.2 outlines procedures for arrival and departure, ingress/egress routes</p> <p>g) Section 7 addresses service vehicle management, specifically 7.3.2 delivery schedules. Section 8 addresses bus and coach management.</p> <p>h) The following sections address management of approved access arrangement:</p> <ul style="list-style-type: none"> <li>- 4.3 Pick up and drop off</li> <li>- 5.4 Pedestrian and cyclists</li> <li>- 6.3 Car park (staff / students/visitors)</li> <li>- 7.3 Service vehicles</li> <li>- 8.3 Bus and Coach</li> <li>- 9.3 Special Events</li> </ul> <p>i) Section 4 outline the % of students approaching the school from the east and west, ingress and egress routes</p> <p>j) Section 6 discusses the car park arrangement, specifically:</p> <ul style="list-style-type: none"> <li>- 6.2.1 details allocation of spaces</li> <li>- 6.2.2 details Tandem parking</li> <li>- 6.3.3 details cap on student parking</li> <li>- 6.3.5 outlines the dedicated locations for staff/student parking</li> <li>- 6.3.6 state that quarterly audits will be undertaken.</li> </ul> <p>k) Section 4.3.6. details traffic marshals enforcing parking zone restrictions</p> <p>l) Section 6.2.1 outlines allocation of parking spaces, Section 6.2.2 outlines tandem parking arrangements; Section 6.3.3 details parking pass requirements for student parking</p> <p>m) Section 9.0 Includes details for parking during special events</p> <p>n) Section 10.0 outlines details for monitoring and review.</p> <p>Email evidence provided confirmed that the OTAMP was submitted to TfNSW for review. TfNSW did not provide comment. The occupation certificate also includes reference to the OTAMP and communications with TfNSW and Council as documentation reviewed.</p>	
<b>Boarding Accommodation Operational Management Plan</b>					
E12	<p>Prior to the issue of the first occupation certificate for the boarding accommodation, a Boarding Accommodation Operational Management Plan (BAOMP) must be submitted to and approved by the Planning Secretary. The BAOMP must:</p> <p>(a) include all the measures to be implemented on the premises in terms of safety &amp; security, amenity and health including but not limited to matters relating to curfews and after-hours access, bringing of visitors on to the site, emergency response and use of communal areas etc;</p> <p>(b) include all the responsibilities of the caretaker/manager;</p> <p>(c) include an Incident Register to be maintained by the caretaker/manager. This Register must be produced upon demand by any Council officer or NSW Police Officer. The Register must contain a direction that all incidents of a criminal nature are to be reported to the Police immediately;</p> <p>(d) be dated and the name and signature of the author of the document must be included; and</p> <p>(e) be displayed in prominent locations within the premises and a copy of the Plan must be provided to all residents of the boarding accommodation.</p>	NT	NA	<p>This condition is relevant to sub-stage 4. The construction of the boarding house is yet to commence, therefore the requirements of this condition are yet to be triggered.</p>	

Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
E13	Prior to occupation and commencement of the use of the boarding accommodation, a notification letter must be forwarded to Council and neighbours providing contact details for the caretaker/manager so that any issues regarding the operation of the premises can be addressed promptly. Evidence of this letter being forwarded as required in this condition must be provided to the satisfaction the Certifier. The letter must also be forwarded to the CCC for information	NT	NA	This condition is relevant to sub-stage 4. The construction of the boarding house is yet to commence, therefore the e requirements of this condition are yet to be triggered.	
<b>Evacuation and Emergency Planning</b>					
E14	Prior to the commencement of operation, a Bush Fire Emergency Management and Evacuation Plan must be prepared consistent with Development Planning A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan December 2014.	C	1. Bushfire Protection Assessment, Loreto Normanhurst - Stage 1 Works and Master Plan. 2. Email from Eco Logical to the certifier (dated 7/12/21).	Email from Eco Logical to the certifier (dated 7/12/21) confirmed compliance with the condition has been satisfied as a result of the findings of the Bushfire Protection Assessment.	
<b>Mechanical Ventilation</b>					
E15	satisfaction of the Certifier that the installation and performance of the mechanical ventilation systems complies with: (a) AS 1668.2-2012 The use of air-conditioning in buildings Mechanical ventilation in buildings and other relevant codes; and (b) any dispensation granted by Fire and Rescue NSW.	NT	NA	This condition is relevant to sub-stage 4. The construction of the boarding house is yet to commence, therefore the e requirements of this condition are yet to be triggered.	
<b>Operational Noise - Design of Mechanical Plant, Equipment and School Bell/PA System</b>					
E16	Prior to the issue of the occupation certificate for the relevant stage, the Applicant must submit evidence to the Certifier that the appropriate noise mitigation measures required under Schedule 3 condition B12 have been incorporated into the design to ensure the development will not exceed the recommended operational noise levels identified in the Construction and Operational Noise Assessment prepared by Wilkinson Murray and dated 16 December 2020.	NT	N/A	The construction certificate will be issued at the completion of Stage 1.	
<b>Car Parking, Service Vehicle and Bicycle parking Arrangements</b>					
E17	Prior to the issue of the occupation certificate for any relevant construction stage, evidence must be submitted to the satisfaction of the Planning Secretary that demonstrates that: (a) the car-parking, service vehicle areas, bicycle parking facilities comply with the approved Staging Report under Schedule 3 condition A10, the amended Staging Plan under Schedule 3 condition B1 and the requirements of Schedule 3 conditions B17 and B18; (b) appropriate pedestrian and cyclist advisory signs have been provided; (c) all works/regulatory signposting associated with the proposed developments have been undertaken at no cost to the relevant roads authority; (d) appropriate signage has been provided within the site to direct the pedestrians to the safe pedestrian crossing facilities within the site; (e) the location and design of the bicycle spaces comply with the provisions of Schedule 3 condition B19; and (f) end-of-trip facilities for staff and students are provided.	C	1. Approval letter - compliance with condition E17 (DPE, 10/10/2022)	Evidence supplied confirmed that the DPE were satisfied with the evidence provide by CTPG for substages 1 -3 carparking network was prepared in accordance with the requirements of this condition.	
<b>Road Damage</b>					
E18	Prior to the commencement of operation, the cost of repairing any damage caused to council or other public authority's assets in the vicinity of the Subject site as a result of construction works associated with the approved development must be met in full by the Applicant.	C	1. IEA interviews	The Auditee confirmed that a bond had been lodged with Council who will hold the bond until they undertake a survey and sign off on the condition of the road. Council was yet to undertake the survey at the time of this IEA.	
<b>Fire Safety Certification</b>					
E19	Prior to the issue of the occupation certificate, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety Certificate must be submitted to the relevant authority and Council. The Fire Safety Certificate must be prominently displayed in the building.	C	2. Occupation Certificate OC 22128 (Blackett Maguire + Goldsmith, 20/10/2022)	The occupation certificate for substages 1 - 3 includes referenced to the fire safety certificate (19/10/2022)	
<b>Structural Inspecting Certificate</b>					

<p style="text-align: center;"><b>Loreto Normanhurst School Redevelopment</b>  <b>Independent Environmental Audit</b>  <b>Determination of a Development Application for State Significant, Development Consent (8996)</b></p>					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
E20	Prior to the issue of the occupation certificate of the relevant parts of any new or refurbished buildings, a Structural Inspection Certificate or a Compliance Certificate must be submitted to the satisfaction of the Certifier. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the approval authority and the Council after: (a) the site has been periodically inspected and the Certifier is satisfied that the structural works is deemed to comply with the final design drawings; and (b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.	C	2. Occupation Certificate OC 22128 (Blackett Maguire + Goldsmith, 20/10/2022)	The occupation certificate for substages 1 - 3 includes referenced to the structural design and inspection certificates (16/8/20223 and 17/8/2022 respectively)	
<b>Compliance with Food Code</b>					
E21	Prior to the issue of the occupation certificate for the boarding accommodation, the Applicant is to obtain a certificate from a suitably qualified tradesperson, certifying that the kitchen, food storage and food preparation areas have been fitted in accordance with the AS 4674 Design, construction and fit-out of food premises and provide evidence of receipt of the certificate to the satisfaction of the Certifier.	NT	NA	This condition is relevant to an occupation certificate for sub-stage 4, which construction is yet to commence. The requirements of this condition will be addressed prior to obtaining an occupation certificate.	
<b>Stormwater Quality Management Plan</b>					
E22	Prior to the commencement of operation, an Operation and Maintenance Plan (OMP) is to be submitted to the satisfaction of the Certifier along with evidence of compliance with the OMP. The OMP must ensure the proposed stormwater quality measures remain effective and contain the following: (a) maintenance schedule of all stormwater quality treatment devices; (b) record and reporting details; (c) relevant contact information; and (d) Work Health and Safety requirements.	NT	NA	The OMP will be issued at the completion of Stage 1.	
<b>Warm Water Systems and Cooling Systems</b>					
E23	The installation of warm water systems and water-cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 1 (or Part 3 if a Performance-based water-cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings Microbial control Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires' Disease.	NT	NA	This condition is relevant to sub-stage 4, which construction is yet to commence.	
<b>Outdoor Lighting</b>					
E24	Prior to the issue of the occupation certificate for the relevant stage, the Applicant must submit evidence from a suitably qualified practitioner to the Certifier that demonstrates that installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers and: (a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and (b) has been mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties, public road network or bushland.	C	1. Outdoor Lighting Certification (Cowyn Building Group, 13/09/2022) 2. Site inspection	The Certification demonstrates compliance with the requirements of this condition: a) includes a statement that the outdoor lighting complies with AS 4282-2019+ b) has been mounted, screened and directed in a manner to not create a nuisance. Observations made during the site inspection confirmed that the outdoor lighting did not appear to be installed in a manner that would likely cause a nuisance to surrounding properties/	
<b>Signage and no right turn restriction</b>					
E25	Prior to the issue of an occupation certificate for the relevant stage, way-finding signage and signage identifying the location of staff car parking must be installed.	C	1. Site inspection (16/03/2023).	Observations made during the site inspection confirmed that relevant signage was installed in the carpark and through road areas.	
E26	Prior to the issue of an occupation certificate for the relevant stage, bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas.	C	1. Site inspection (16/03/2023).	Observations made during the site inspection confirmed that signage for bicycle way finding had been installed to direct cyclists to the bicycle parking area.	

Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
E27	Prior to the issue of the occupation certificate for the through site road, the Applicant must provide the following to the satisfaction of the Certifier: (a) evidence to demonstrate that "No stopping" restrictions have been installed within the through site road (effective at all times); (b) evidence of endorsement from Council's Traffic Committee and/or TfNSW (where applicable) to install a "No Right Turn" from Mount Pleasant Avenue onto Pennant Hills Road for the following time periods: (i) 8am to 9.30am school days; and (ii) 2.30pm to 4pm school days (c) evidence, of any alternative advice (including refusal) from the relevant roads authority (Council or TfNSW), if the requirement of Schedule 3 condition E27(b) is not endorsed by the relevant roads authority; and (d) Evidence to demonstrate that the "No Right Turn" signage has been installed, in the case endorsement is obtained from the relevant roads authority(s).	C	1. Letter - Local Traffic Committee consideration (Hornsby Shire Council, 11/10/2022) 2. Email to certifier - compliance with Condition E27 (11/10/2022)	The letter from Council states that they note that this condition does not require a restriction to be in operation, but only seeks that it is considered by the LTC. The letter also states that Council intends to approach the community with a proposal to conduct a trial of the right hand turn restriction. Council considers that this condition should not restrict the opening of stage 1 of the development.	
<b>Operational Waste Management Plan (OWMP)</b>					
E28	Prior to the commencement of operation, the Applicant must prepare an OWMP for the development and submit it to the Certifier. The OWMP must: (a) incorporate relevant amendments to the development required under Schedule 3 condition B2; (b) detail the type and quantity of waste to be generated during operation of the development; (c) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); (d) detail the materials to be reused or recycled, either on or off site; and (e) include the Management and Mitigation Measures included in EIS Appendix P.	NT	NA	The OWMP will be issued at the completion of Stage 1.	
<b>Site Contamination</b>					
E29	If, based on further site investigations report undertaken in accordance with Schedule 3 condition C31, it is determined that ongoing on-site management of soil or groundwater contamination is required, then the following requirements must be satisfied: (a) the Applicant must engage a NSW EPA-accredited Site Auditor to confirm the appropriateness of the site for the proposed use. The Applicant must obtain from a NSW EPA-accredited Site Auditor a Section A2 Site Audit Statement accompanied by an Environmental Management Plan prepared by a certified consultant and submit it to the Planning Secretary and relevant Council for information no later than one month before the commencement of operation; and (b) the development must not be used for the purpose approved under the terms of this consent until a Site Audit Statement determines the land is suitable for that purpose and any conditions on the Site Audit Statement have been complied with.	C	1. Letter: Interim Site Audit Advice - review and endorsement of revised supplementary Contamination Assessment and comment on the RAP Addendum Methodology Letter, Stage 1 works area site (Enviroreview, 16/03/2023) 2. Letter: Site remediation and validation within stage 1A Redevelopment portion of Loreto Normanhurst School (Sydney Environmental Group, 6/03/2023) 3. Supplementary Contamination Assessment (Sydney Environmental Group, 3/03/2023) 4. Letter: Response to Interim Site Audit Advice (IA 0301-20122-06) (Sydney Environmental Group, 3/03/2023) 5. IEA interviews	Enviroreview were engaged to undertake an audit on the supplementary contamination assessment and the Methodology. The letter from Enviroreview confirmed that the area subject to assessment as part of the Supplementary Contamination Assessment can be made suitable for the proposed development through the implementation of the remediation and validation works proposed by the RAP and RAP Addendum letter.  The Auditee confirmed that a site audit statement will be issued at the completion of stage 1 works, however interim advice letters are issued at the end of each substage.	
<b>Landscaping</b>					
E30	Prior to the issue of an occupation certificate for the relevant stage, landscaping of the site must be completed in accordance with approved landscape plan(s) under Schedule 3 condition B5.	C	1. Letter Compliance Certificate - Loreto Normanhurst (Dredge Brothers, Stonemasons and Landscape Gardiners, 12/09/2022)	The letter from Dredge Bros confirms that the landscape works completed are in accordance with the plans and specifications.	

Loreto Normanhurst School Redevelopment Independent Environmental Audit Determination of a Development Application for State Significant, Development Consent (8996)					
Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
E31	Prior to the issue of an occupation certificate for the relevant stage, the Applicant must submit an Operational Landscape Management Plan to manage the proposed landscaping on-site, to the satisfaction of the Certifier. The plan must: (a) describe the ongoing monitoring and maintenance measures to manage proposed landscaping; (b) be consistent with the Applicants Management and Mitigation Measures in the RTS Appendices C and I; and (c) incorporate the indirect impact mitigation measures indicated in the BDAR Loreto Normanhurst Biodiversity Assessment Report (version 6) prepared by Eco Logical Australia dated 16 December 2020 relevant to the ongoing operation of the development	C	1. Scope of Works for Lawn and Garde Maintenance (Dredge Brothers Stonemasons and Landscape Gardiners) 2. Maintenance Schedule (6 & 12 month plan)	The Scope of works outlines and maintenance schedule generally imply with the requirements of this condition: a) the extent of work required including lawn and garden maintenance (including specifications), general works, mulching safety b) The schedule outlines what activities are required for each month for the initial 6 months and then ongoing.	
<b>BASIX</b>					
E32	Prior to the issue of the occupation certificate for the boarding accommodation building, the Applicant must implement the BASIX commitments required by Schedule 3 condition B7.	NT	NA	This condition will be triggered prior to requesting an occupation certificate for substage 4.	
<b>Pennant Hills Road Vehicular Entrance</b>					
E33	Prior to the issue of any occupation certificate, removable bollards must be installed at the Pennant Hills Road vehicular entrance of the driveway accessing the Chapel.	C	1. Site inspection	Observations made during the site inspection confirmed that removeable bollards had been installed in accordance with the requirements of this condition.	
<b>Road Safety Audit</b>					
E34	Prior to the issue of an occupation certificate for internal through site road and drop-off/pick-up facilities, a Road Safety Audit (RSA) must be conducted on the school pick-up and drop off areas, through site road, pedestrian and vehicular accesses to the school. The RSA must be undertaken in accordance with Austroads Guide to Road Safety Part 6: Managing Road Safety Audits and Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits.	C	1. Loreto Normanhurst P1A, P3A and Through Site Link Road Safety Audit Detailed Design Stage (TTW, 12/9/2022)	The RSA (TTW, 12/09/22) has been generally undertaken in accordance with the TfNSW Guidelines for Road Safety Practices 2011 and Austroads Guide to Road Safety Part 6 (2022).	
E35	The results of the RSA and the relevant recommendations, including any measures to improve road safety must be submitted to the Certifier for information within one month of undertaking the audit and prior to the issue of that substage.	C	1. Loreto Normanhurst P1A, P3A and Through Site Link Road Safety Audit Detailed Design Stage (TTW, 12/9/2022) 2. Audit interviews	The Certifier review indicates that the RSA was sent to the certifier on 21/09/22 which was within one month of the audit . The RSA was forwarded to both Council and TfNSW on 16/09/22 TfNSW responded that they had no comments. The auditee confirmed that Council did not provide any comment.	
E36	Based on the recommendations of the RSA, appropriate road safety and/or traffic management measures must be implemented, in consultation with Council and TfNSW, within 3 months of the RSA and evidence submitted to the satisfaction of the Certifier.	C	1. Loreto Normanhurst P1A, P3A and Through Site Link Road Safety Audit Detailed Design Stage (TTW, 12/9/2022) 2. Email - Condition 36 Road Safety Audit submission (TTW, 16/09/2022) 3. Email - Condition 36 Road Safety Audit response (TfNSW, 10/11/2022) 4. Audit interviews	The RSA was forwarded to both Council and TfNSW on 16/09/22 via email. TfNSW responded that they had no comments. The auditee confirmed that Council did not provide any comment.	
<b>Certification of WSUD Facilities</b>					
E37	Prior to the issue of an occupation certificate for the relevant stage, a certificate from a Civil Engineer must be obtained stating that the WSUD facilities have been constructed and will meet the water quality targets set out in the approved WSUD Strategy required by Schedule 3 Condition B11.	NT	N/A	The construction certificate will be issued at the completion of Stage 1.	
<b>Damage to Council Assets</b>					
E38	Any damage caused to Council's assets as a result of the construction or demolition of the development must be rectified by the applicant in accordance with AUS-SPEC Specifications ( <a href="http://www.hornsby.nsw.gov.au/property/build/aus-spec-terms-and-conditions">www.hornsby.nsw.gov.au/property/build/aus-spec-terms-and-conditions</a> ). Rectification works must be undertaken prior to the issue of an occupation certificate, or sooner, as directed by Council.	C	1. Site Inspection 2. IEA interview 3. CCC Meeting minutes February 2023	The only public domain work that had been completed at the time of the IEA was works associated with substages 1 - 3: the kerb and channel for the driveway access to the Osborn Road carpark. All footpath kerb and gutters were observed to be reconstructed. Landscaping had also been completed. The scope of works did not require any public utility adjustments, reinstatement of road pavement or any fill placed within the road reserve. Item 7 of the CCC meeting minutes and the Auditee confirmed that CTPG had contacted Council regarding issues /remediation works for Mount Pleasant Avenue (existing poor condition) and will complete a dilapidation survey prior to the commencement of substage 4.	
<b>Creation of Easements (Application for the Execution of legal documents)</b>					



**Loreto Normanhurst School Redevelopment  
Independent Environmental Audit**

**Determination of a Development Application for State Significant, Development Consent (8996)**

Condition Ref	Requirement (Exact Wording)	Assessment	Evidence Reviewed	2022 IEA Findings	Unique Identification
E39	<p>Prior to the issue of the occupation certificate for the relevant stage, the following easement/s must be created on the title of the property under the Conveyancing Act 1919:</p> <p>(a) the creation of an appropriate "Positive Covenant" and "Restriction as to User" over the constructed on-site detention/retention systems and the water quality devices, within the lots in favour of Council in accordance with council's prescribed wordings. The position of the on-site detention and water quality system is to be clearly indicated on the title; and</p> <p>(b) to register the OSD and water quality devices easement, the restriction on the use of land "works as executed" details of the on-site-detention system must be submitted verifying that the required storage and discharge rates have been constructed in accordance with the design requirements. The details must show the invert levels of the onsite system together with pipe sizes and grades. Any variations to the approved plans must be shown in red on the "works-as-executed" plan and support by calculations.</p> <p>Note: Council must be nominated as the authority to release, vary or modify any easement, restriction or covenant.</p>	NT	N/A	This condition will be triggered at the completion of Stage 1.	
<b>Arborist Certification</b>					
E40	<p>Prior to the issue of the occupation certificate for the relevant stage, the project Arborist must submit to the Certifier a certificate that details:</p> <p>(a) all tree protection requirements were complied with for the duration of the construction works in accordance with the Arboricultural Impact Assessments Report "Boarding House" and "Car Parks and Through Site Link", prepared Earthscape Horticultural Services and dated 21 January 2021;</p> <p>(b) all completed works relating to tree protection and maintenance have been carried out in compliance with the conditions of consent and approved plans (as amended by conditions of this consent);</p> <p>(c) dates, times and reasons for all site attendance by the project Arborist/s; and</p> <p>(d) all works undertaken to maintain the health of retained trees.</p>	C	<ol style="list-style-type: none"> <li>Approval Development (Car parks and Through Site Link) - SSD-8996 Compliance Statement - Tree Protection (Eandscape Horticultural Service, 31/12/2021)</li> <li>Site inspection (16/6/2022)</li> <li>IEA interview</li> </ol>	<p>Detail outlined in the Compliance Statement certified compliance with the requirements outlined in this condition:</p> <p>a) tree protection fencing installed in accordance with condition D19(c) and the Tree Protection Plan</p> <p>b) tree protection fencing installed in accordance with condition D19(c) and the Tree Protection Plan</p> <p>c) dates, and reasons for inspections outlined</p> <p>d) an arborist (AQF5) was engaged (Eandscape)</p> <p>The Auditee confirmed that an arborist certificate would be obtained for works undertaken as part of substage 4.</p>	

**Loreto Normanhurst School Redevelopment  
Independent Environmental Audit  
CEMP and Sub-Plans**

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
<b>C14</b>	<b>Construction Environmental Management Plan (CEMP)</b>				
3.1	<p><b>Environmental Awareness and Training</b> All personnel who intend to work on the proposed development will be made aware of their environmental obligations and be provided with relevant training prior to commencing work on site.</p> <p>COWYN Building Group will provide the relevant training including a detailed site induction with emphasis on CEMP, emergency response induction, use of spill kits and obligations in the relevant regulations. COWYN Building Group will conduct regular toolbox talks and site meetings, and will manage the site in in conformance with its Integrated Management System, which has been designed in accordance with the following: - ISO9001:2015 - ISO14001:2015 - ISO450001:2018</p> <p><b>Training package</b> <b>Training matrix</b> <b>Training record</b></p>	C	<p>1. Construction Environmental Management Plan v.1.0 (Cowyn Building Group). 2. Site induction record form (blank).</p>	<p>Section 3.1 of the CEMP for substage 1 - 3 outlines requirements for environmental awareness and training. The induction form includes site induction details. NB: Substages 1-3 were complete at the time of this IEA.</p> <p>Substage 4 had not commenced at the time of this IEA. The Auditee confirmed during the audit interviews that a site specific CEMP will be developed by the Contractor for Substage 4.</p>	
3.2	<p><b>Environmental Management Records</b> Appropriate records that demonstrate conformance with the environmental obligations identified in this CEMP will be maintained for a period of 7 years. These records will including induction and training records, complaint and incident reports, licenses and permits where required, waste transfer receipts, fill validation reports, environmental inspection and compliance reports, waste classification reports, COWYN Building Group's Integrated Management System records and other documents as deemed required. All records will be made available for review by the PS upon completion of the works or at any time as required.</p>	C	<p>1. Audit interviews</p>	<p>Substages 1 - 3 were complete at the time of this IEA. The Auditee confirmed that there had been no changes made to the to records management during the audit period for substages 1 - 3. All documents will be made available to the Planning Secretary upon completion of works (Stage 1).</p> <p>Substage 4 had not commenced at the time of this IEA. The Auditee confirmed during the audit interviews that the Contractor will be made aware of the requirements for records management.</p>	
3.3	<p><b>Monitoring / Auditing</b> COWYN Building Group will be responsible for monitoring and auditing environmental performance on site. Each environmental aspect will be monitored against the control measures outlined in 4.1- 4.12 and SWMS. The following table sets out environmental aspects to be monitored, frequency of monitoring and staff member responsible for the monitoring:</p>	C	<p>1. Weekly Site Safety Inspections</p>	<p>Substages 1 - 3 were complete at the time of this IEA. A review of weekly inspection forms confirmed that they included a section for environmental measures detailed in the CEMP.</p> <p>Substage 4 had not commenced at the time of this IEA. The Auditee confirmed during the audit interviews that the Contractor will be made aware of the requirements for monitoring and auditing.</p>	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
3.4	<p><b>Reporting</b>  COWYN Building Group will prepare a brief written report monthly incorporating the following details:</p> <ul style="list-style-type: none"> <li>- Results of all inspections and monitoring events</li> <li>- Any actions arising from inspections</li> <li>- Targets that have not been met and a description of the corrective action taken to address any failure to meet targets</li> <li>- Summary of complaints received on site</li> <li>- Summary of environmental incidents and emergencies, response measures and corrective actions</li> </ul> <p>These reports will be prepared in the form of site meeting minutes. A copy of the report will be provided to the PS within 2 business days of the site meeting</p>	C	<ol style="list-style-type: none"> <li>1. Monthly reports</li> <li>2. Audit interviews</li> </ol>	<p>Substages 1 - 3 were complete at the time of this IEA, however copies of monthly progress reports were observed during the audit interviews and included:</p> <ul style="list-style-type: none"> <li>- Correspondence</li> <li>- Requests for Information (RFIs)</li> <li>- Weekly inspections</li> <li>- Incident and near miss records</li> <li>- Complaints</li> <li>- Observations</li> <li>- Photographic evidence</li> <li>- Man hours</li> </ul>	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
3.5	<p><b>Complaint Handling</b> COWYN Building Group will notify the PS immediately upon the receipt of any complaint. Complaints will be registered and recorded in the following manner: Any feedback that is received shall be reviewed by the Project Manager. This includes formally received written feedback and general comments and feedback received during meetings and site inspections. Where any feedback is received that may be negative or a complaint, a non-conformance shall be raised. This ensures that the information is recorded and can be analysed to determine appropriate corrective and preventative actions. All customer feedback will be reviewed during the management review meeting to identify any trends that may be occurring to help with continual improvement of our performance. For all negative feedback and complaints, the contact shall be given a formal response and kept up to date with implementation of corrective and preventative action.</p>	C	<ol style="list-style-type: none"> <li>1. Audit interview</li> <li>2. Complaints register extract</li> <li>3. Observations register</li> </ol>	<p>Evidence of a noise complaint record was observed during the IEA and included: date, contributing condition/behaviours, description of complaint, comments and relevant attachments. An extract of the complaints register was also observed during the audit.</p>	
3.7	<p><b>Environmental Incidents and Emergencies</b> COWYN Building Group will be responsible for managing environmental incidents. All incidents and emergencies will be reported to the PS as soon as possible. Spill response procedures are to be initiated in the event of a spill and contaminated areas are to be remediated to pre-spill / incident conditions, in accordance with the relevant regulations and other regulations as required.</p>	C	<ol style="list-style-type: none"> <li>1. Complaint #5 DP&amp;E Complaint record - works outside of hours.</li> <li>2. Construction Environmental Management Plan v.1.0 (Cowyn Building Group).</li> </ol>	<p>Noise complaint record received included location, date, contributing condition/behaviours, description of complaint, comments and attachments.</p>	
3.8	<p><b>Licenses &amp; Permits</b> COWYN Building Group will be responsible for ensuring all relevant licenses, permits and approvals are in place prior to commencement of onsite works, All subcontractors will be required to submit Site Specific SWMSs, Insurance Particulars &amp; Relevant Licenses to the WHS Officer for approval prior to being permitted to commence work on site.</p>	C	<ol style="list-style-type: none"> <li>1. Audit interviews.</li> <li>2. Subcontractor records</li> </ol>	<p>During the interview copies of permits and SWMS for each sub-contractor were observed and confirmed.</p>	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
4.2	<p><b>Erosion and Sediment Control:</b></p> <ul style="list-style-type: none"> <li>- Installation of geofabric material over pit lids and placement of sediment control fencing</li> <li>- Direct stormwater run-off around the site / exposed surfaces</li> <li>- Stabilise cleared area</li> <li>- Restrict vehicle movements to well defined access roads and identify no-go areas clearly via signage / taping</li> <li>- Locate construction / landscaping material stockpiles at least 10 metres from drainage lines and natural waterways (when suitable)</li> <li>- Testing to occur for determination of excavated spoil</li> <li>- Install erosion and sediment control measures at appropriate locations, including along drainage lines, down slope of exposed surfaces and at the site perimeter as required.</li> <li>- Sweep local roads as tracking of sediment to roads occurs</li> <li>- Prepare and maintain a log of the effectiveness of the erosion and sediment control devices, including recommendations for improvements. Report to PS</li> </ul>	C	1. Site inspection	<p><b>Substages 1 - 3:</b></p> <p>Observations made on site confirmed that the site had been left in a stable condition:</p> <ul style="list-style-type: none"> <li>- Landscaping complete</li> <li>- no exposed soils on site</li> <li>- no evidence of sediment build up in gutters or drainage pits (internal and external)</li> </ul> <p>Observations made during the site inspection confirmed that the site for substage 4 had been cleared and geofab had been installed over the site (exposed soils).</p>	
4.3	<p><b>Asbestos:</b></p> <ul style="list-style-type: none"> <li>- Assess proposed asbestos removal and prepare project specific asbestos removal SWMS in conjunction with Class A</li> <li>- Asbestos removal contractor Maintain watering equipment on-site and use to suppress Asbestos as required</li> <li>- Maintain waste transfer certificates on site for the duration of the works and provide a copy to the PS</li> <li>- Air monitoring to be completed during the demolition and removal of asbestos where the asbestos present is Friable or if the asbestos is non-friable but in a fragile state</li> <li>- Log waste disposal, including type and volumes of Asbestos disposed and maintain waste transfer certificates on site.</li> </ul> <p>Provide a copy of all waste transfer certificates to the PS</p> <ul style="list-style-type: none"> <li>- Inspection and clearance certificate provided by an independent asbestos assessor. Clearance certificate to be lodged to PS for their records</li> </ul>	C	<ol style="list-style-type: none"> <li>1. Asbestos materials clearance inspection report (Sydney Environmental Group, 26/3/2022).</li> <li>2. Cleanaway receipts for contaminated asbestos soil (25/01/2022).</li> <li>3. Eurofins environment testing certificate of analysis - air quality (13/1/2022, 25/1/2022, 25/3/2022, 26/3/2022).</li> <li>4. Subcontractor SWMS Observation checklist #3 (25/1/2022).</li> <li>5. Asbestos removal control plan (Hunter West, 25/1/2022).</li> <li>6. SWMS Hunter West 23/1/2022.</li> <li>7. Eastern Creek Ecology Park Bingo Waste Service waste receipt 26/03/2022.</li> <li>8. Toolbox/Prestart record (Hunter West 25/1/2022).</li> </ol>	<p>Evidence provided for works associated with substages 1 - 3 demonstrated compliance with this item:</p> <ul style="list-style-type: none"> <li>- SWMS for asbestos removal developed</li> <li>- Air monitoring records maintained</li> <li>- Waste disposal receipts received confirming asbestos waste had been collected by licensed waste transporters</li> </ul>	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
4.4	<p><b>Dust control:</b></p> <ul style="list-style-type: none"> <li>- Install wind fences where appropriate</li> <li>- Any Crushers to be used on site to have dust suppression sprinklers incorporated</li> <li>- Crusher Stockpiles to be either covered with membrane or dust suppression sprinklers used</li> <li>- Log the date, time and nature of dust suppression activities. Report to PS</li> </ul>	C	1. Site inspection	<p>Observations made on site confirmed that the site for substages 1 - 3 had been left in a stable condition:</p> <ul style="list-style-type: none"> <li>- Landscaping complete</li> <li>- No exposed soils remained on site</li> <li>- No evidence of sediment build up in gutters or drainage pits (internal and external)</li> </ul> <p>Observations made during the site inspection confirmed that the site for substage 4 had been cleared and geofab had been installed over the site (exposed soils).</p>	
4.5	<p><b>Water Quality Management:</b></p> <ul style="list-style-type: none"> <li>- Protect existing drains, pits, conduits and openings which are to remain in service in the vicinity of the works by appropriate measures (i.e. straw bales, silt fences etc)</li> <li>- Restrict plant wash down to designated wash areas on site.</li> <li>- Restrict refuelling of plant and equipment to designated areas on site. (All refuelling is to be undertaken by mobile transfer, no fuels are to be stored on the site).</li> <li>- Water quality monitoring, if required, must be conducted and reviewed by an appropriately qualified professional who can advise the Contractor regarding compliance with quality targets.</li> </ul>	C	1. Site inspection	<p>Observations made on site confirmed that there was no evidence of sediment build up in gutters or drainage pits (internal and external) for substages 1 - 4.</p>	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
4.6	<p><b>Noise:</b></p> <ul style="list-style-type: none"> <li>- Fit and maintain appropriate noise attenuation equipment to on-site plant and equipment in accordance with manufacturer's specifications</li> <li>- Undertake noise monitoring as directed by the PS / PS. (Note: Noise monitoring is not required however if noise complaints are received, qualitative or quantitative monitoring may be required to investigate the complaint). Provide a copy of the results to the PS and advise the action taken to alleviate nuisance noise</li> <li>- Maintain an onsite record of any noise monitoring conducted during construction whether undertaken in the normal course of the works or at the request of the PS / PS. Provide a copy of the monitoring results to the PS at completion of the works</li> </ul>	C	<ol style="list-style-type: none"> <li>1. Site inspection</li> <li>2. Audit interviews</li> </ol>	<p>Construction works for Substages 1 - 3 were complete at the time of the site inspection, therefore there were no construction related noise observed.</p> <p>The Planning Secretary had not requested any noise monitoring during the IEA period.</p>	
4.7 / 4.8	<p><b>Land Contamination (New &amp; Existing):</b></p> <ul style="list-style-type: none"> <li>- Provide documentary evidence that all fill to be brought onto site is free of contamination. (i.e. Fill is VENM or fill meets requirements of the Relevant regulations</li> <li>- Maintain waste transfer certificates for removal of contaminated materials to an appropriate landfill facility on site and provide a copy to the PS on completion of the remedial works.</li> <li>- Identify area for routine maintenance on Site Map</li> <li>- Maintain appropriate types and quantities of spill response materials in a readily accessible location.</li> <li>- Ensure all waste is classified in accordance with OEH Waste Classification Guidelines prior to leaving site and only licenced facilities will be used for disposal</li> </ul>	C	<ol style="list-style-type: none"> <li>1. Clean fill material records</li> <li>2. Waste disposal records</li> <li>3. Waste disposal register</li> </ol>	<p>Fill records provided evidence of VENM being received on the site. Waste records demonstrated compliant transport, disposal and recording of the waste material leaving the site for substage 1 - 3.</p>	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
4.9	<p><b>Waste:</b></p> <ul style="list-style-type: none"> <li>- Implement a waste minimisation plan that examines opportunities for waste avoidance, reduction, reuse and recycling</li> <li>- Contain all waste materials generated on site in appropriate storage containers prior to removal off-site</li> <li>- All waste soil &amp; fill to be treated as contaminated until tested which involves segregation and placed within a lined skip bin for containment prior to removal from site</li> <li>- Maintain waste transfer certificates on site for the duration of the works and provide a copy to the PS</li> <li>- Provide bins for construction workers and staff at locations where they consume food. Putrescible waste must be stored in a covered container at all times to prevent bird hazards</li> <li>- All waste soil &amp; fill to be tested by approved laboratories for NATA accredited analysis</li> <li>- Log waste disposal, including type and volumes of materials disposed and maintain waste transfer certificates on site</li> </ul>	C	<ol style="list-style-type: none"> <li>1. Construction Waste Management Plan (CWMP)</li> <li>2. Waste transfer certificates</li> <li>3. Contaminated soil testing results</li> <li>4. Waste disposal register</li> <li>5. Site inspection</li> </ol>	<p>Evidence provided demonstrated compliance with this item:</p> <ul style="list-style-type: none"> <li>- Waste minimisation plan included in the CWMP</li> <li>- Appropriate waste bins were supplied for the storage and segregation of waste (noting there was no construction occurring at the time of the audit - all waste / waste bins associated with the works had been removed off site)</li> <li>- Contaminated soil testing was undertaken prior to soil removal</li> <li>- All soil was tested by appropriately qualified persons and sent to a NATA accredited lab</li> <li>- Waste disposal register was observed to be up to date</li> </ul>	
4.11	<p><b>Cultural Heritage:</b></p> <ul style="list-style-type: none"> <li>- Implement cultural heritage work zone work plan if necessary</li> <li>- Ensure any new installations are in accordance with the design documentation</li> <li>- Complete Archival Record of any new installations completed and report to the PS.</li> <li>- An archival record to be prepared in accordance with the NSW heritage office practices. Report to PS</li> </ul>	NT	<ol style="list-style-type: none"> <li>1. Audit interviews</li> </ol>	<p>Construction works for Substages 1 - 3 were complete at the time of the site inspection, the Auditee confirmed that no heritage works had been undertaken within the audit period.</p>	
4.12	<p><b>Hot works:</b></p> <ul style="list-style-type: none"> <li>- Identify area of potential contamination on Site Map</li> <li>- Ensure staff are trained in emergency response procedures</li> <li>- Establish work zone for hot works to occur and no other workers are at risk should an issue arise</li> <li>- Prior to any work Hot works beginning on site "Hot works permit" to be issued to subcontractor, including any hot work near or in excavated areas.</li> </ul>	NT	<ol style="list-style-type: none"> <li>1. Audit interviews</li> </ol>	<p>Construction works for Substages 1 - 3 were complete at the time of the site inspection, the Auditee confirmed that no hot works had been undertaken within the audit period.</p>	
4.13	<p><b>Lighting:</b></p> <ul style="list-style-type: none"> <li>- Ensure that security lighting is LED type and low height and low intensity to avoid spill lighting to neighbours and night sky</li> </ul>	C	<ol style="list-style-type: none"> <li>1. Site inspection</li> <li>2. Outdoor Lighting Certification (Cowyn Building Group, 13/09/2022)</li> </ol>	<p>All temporary lighting for construction works had been removed at the time of the site inspection (substages 1 - 3). Permanent lighting observed during the site inspection did not appear to present a potential issue of light spillage to neighbouring properties. Lighting certification had been obtained. Temporary lighting was yet to be installed for substage 4.</p>	
<b>C19</b>	<b>Construction Waste Management Sub-Plan (CWMP)</b>				



Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
1.2	<p><b>Environmental management systems overview:</b>  EWMS will be developed and signed off by environment and management representatives prior to associated works and construction personnel will be required to undertake works in accordance with the identified mitigation and management measures.</p>	C	1. Construction Waste Management Plan (CWMP) 2. Audit interviews	No documented evidence that supported the approval of the document was observed, however substages 1 - 3 were complete at the time of this IEA. The Auditee confirmed that this will be addressed in the CWMS to be developed for substage 4.	OFI-03
3.2	<p><b>Construction Certificate Requirements</b>  <b>Table 3-1 Conditions of approval relevant to waste:</b>  - The CWMS must record quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use  - Information regarding the recycling and disposal locations  - Confirmation of the contamination status of the development areas of the site based on the validation results</p>	C	1. Waste disposal register	A review of the waste register confirmed it included details of the quantities of waste, classification and disposal locations.	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
5.1	<p><b>Classification of waste streams</b></p> <p>- Where waste cannot be avoided, reused or recycled it will be classified and appropriate disposal will then occur</p>	C	1. Waste disposal register	A review of the waste register confirmed waste classification and disposal locations (offsite).	
5.4	<p><b>Reuse and recycling</b></p> <p>- Waste segregation onsite – Waste materials, including spoil and demolition waste, will be separated onsite into dedicated bins/areas for either reuse onsite or collection by a waste contractor and transport to offsite facilities</p> <p>- Waste separation offsite – Wastes to be deposited into one bin where space is not available for placement of multiple bins, and the waste is to be sorted offsite by a waste contractor</p> <p>- Where the existing local roads are excavated, this material will be reused on site if uncontaminated or off site in accordance with the conditions attached to the appropriate general resource recovery order or exemption</p>	C	<p>1. Site inspection</p> <p>2. Audit interviews</p>	<p>Observations made during the site inspection confirmed that all waste and waste bins associated with construction of substages 1 - 3 had been removed offsite.</p> <p>An inspection of the works are for substage 4 confirmed that there was no waste / waste bins present. The Auditee confirmed that all waste will be segregated accordance with the requirements of this condition for works associated with substage 4.</p>	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
5.5	<p><b>Waste Handling and Storage:</b></p> <ul style="list-style-type: none"> <li>- Spoil, topsoil and mulch are to be stockpiled onsite in allocated areas, where appropriate, and mitigation measures for minimising cross contamination of waste streams, dust control and surface water management will be implemented as per the Soil and Water Management Sub Plan</li> <li>- Liquid wastes are to be stored in appropriate containers in bunded areas until transported offsite. Bunded areas will have the capacity to hold 110 per cent of the liquid waste volume for bulk storage or 120 per cent of the volume of the largest container for smaller packaged storage</li> <li>- Hazardous waste will be managed by appropriately qualified and licensed contractors, in accordance with the requirements of the Environmentally Hazardous Chemicals Act 1985 and the EPA waste disposal guidelines</li> <li>- All other recyclable or non-recyclable wastes are to be stored in appropriate covered receptacles (e.g. bins or skips) in appropriate locations onsite and contractors commissioned to regularly remove/empty the bins to approved disposal or recycling facilities</li> </ul>	C	<ol style="list-style-type: none"> <li>1. Site inspection</li> <li>2. Audit interviews</li> </ol>	<p>Substages 1 - 3 were complete at the time of this IEA. Observations made during the site inspection confirmed that all waste and waste bins associated with construction of substages 1 - 3 had been removed offsite. The Auditee confirmed that the requirements of this condition will be addressed in the CWMP for substage 4.</p>	
5.6	<p><b>Waste Disposal:</b></p> <ul style="list-style-type: none"> <li>- Waste (and spoil) disposal is to be in accordance with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Avoidance and Resource Recovery Act 2001. Wastes that are unable to be reused or recycled will be disposed of offsite to an EPA approved waste management facility following classification (refer to section 5.1). Details of waste types, volumes and destinations are to be recorded in the Waste Management Register (Appendix A).</li> <li>- Prior to transporting wastes to a place that is not owned by Roads and Maritime and is not a licensed waste facility COWYN Building Group must submit to the Principal a completed and signed notice under section 143(3A) of the POEO Act ("s.143 Notice"). This includes waste transported for reuse, recycling, and disposal or stockpiling. Waste in this context means any surplus material and includes spoil, Virgin Excavated Natural Material ("VENM"), Excavated Natural Material ("ENM"), crushed rock, reclaimed asphalt pavement, mulched vegetation, waste concrete, etc. All proposed waste re-use options must comply with the POEO Act and associated regulations.</li> </ul>	C	<ol style="list-style-type: none"> <li>1. Waste disposal register.</li> <li>2. Site inspection</li> <li>3. Audit interviews</li> </ol>	<p>Waste records were observed during the audit interviews, confirmed all waste material was disposed of at licensed facilities.</p>	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
6	<b>Environment Mitigation and Management Measures:</b> Specific measures and requirements to address waste management and energy use issues are outlined in Table 6-1.	C	1. Waste disposal register 2. Waste disposal records	The IEA included a check against the management measures listed in Table 6-1 of the CWMS and no matters of non-conformance were identified during the IEA.	
7.3	<b>Training</b> All employees, contractors and utility staff working on site will undergo site induction training relating to waste management issues.	C	1. Sign-on Induction Requirements 2. Site induction details	Site induction details included requirements for waste management on the site. The Auditee confirmed that all site personnel completed the site induction training The Auditee confirmed that the induction training will be updated for substage 4.	
7.4	<b>Monitoring and inspection</b> Weekly Environmental Inspections that includes waste management. - As required document and record the types and volumes of wastes generated, reused, recycled and disposed of - Waste records - As required document and record the locations of stockpiled and stored waste - Update the Waste Management Register monthly of all waste collected for disposal and/or recycling until final completion in accordance with the RMS G36 specification - Compile and record monthly resource usage during construction works (e.g. energy, water, fuel, oil, etc - As required record any results of any soil, surface or groundwater sampling - The Waste Contractors are to maintain and document the types and volumes of wastes collected recycled and disposed of. They are to provide monthly reports on waste removal and disposal activities to Cowyn Building Group	C	1. Inspection: SMP.2.1 - Weekly Site Safety Inspection 2. Waste disposal register 3. Waste contractor receipts	Monitoring and inspection records observed during the IEA included those listed in the CWMS. Waste contractor records comprised of receipts of material removed from the site. A monthly report from the waste contractor was not observed during the IEA.	<b>OFI-04</b>
8.2	<b>Waste Management Register</b> A waste management register (Appendix A) will be maintained and include the following information: - Type of waste and its classification (according to the POEO Act and Waste Classification Guidelines). - Quantities of waste, measured in tonnes. - How and where the waste was reused, recycled, stockpiled or disposed of. - date when the waste was reused, recycled, stockpiled or disposed of; and - Name and waste transport licence (if applicable) of the transporter used. Waste information will include details of the date waste was reused, recycled, stockpiled or disposed, quantity and disposal location.	NC	1. Waste disposal register 2. Audit interviews 3. SE220007.01 Loreto Normanhurst IEA Audit Report Rev 3 (Epic Environmental, 22/03/2023)	<i>The clause within the CWMS required that COWYN record how and where waste material is reused, recycled, stockpiled and disposed of. While the destination, transporter and date of material leaving the site was documented, the waste disposal register did not describe the ultimate fate of the material leaving the site (i.e. reused, recycled, stockpiled or disposed).</i>  While the destination, transporter and date of material leaving the site is documented, however the waste disposal register does not describe the ultimate fate of the material leaving the site (i.e. reused, recycled, stockpiled, or disposed). Note: Substages 1 - 3 were completed at the time of this audit, therefore the actions identified in the initial 2022 IEA to address the NC were not implemented retrospectively.	<b>NC - 07</b>
<b>C10</b>	<b>Community Communications Strategy</b>				

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
5.1	<p><b>Information Provision</b></p> <p>Information about the project will be provided to residents in line with the requirements of Development Consent Condition C10 and C11 through the communication activities outlined in the Table 4 Communication activities for information provision.</p>	C	<p>1. Community Consultative Committee</p> <p>2. Community Update Newsletters</p> <p>(NB: both are advertised on: <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a>)</p>	<p>A CCC has been established and details are available on the Project website.</p> <p>Quarterly meetings are scheduled, the latest occurring on 21/2/23.</p> <p>Information on the Project and the CCC minutes are available on the website.</p>	
5.2	<p><b>Community Based Forums</b></p> <p>Depending on the level of stakeholder interest and feedback in the first three months of construction of Stage 1, the principal contractor or their authorised representative will consider the establishment of community based forums to enable deeper focus on key environmental management issues for the project. Following the first three months of Stage 1 construction, this process will be reassessed every six months through to completion of Stage 1 works.</p> <p>If required, public meetings and presentations will be held as frequently as required.</p> <p>Meetings would include:</p> <ul style="list-style-type: none"> <li>- Updating the community on the environmental management of the development works</li> <li>- Providing a direct face to face consultation between the project team and the concerned community members</li> </ul>	C	<p>1. Community Consultative Committee</p> <p>2. Community Update Newsletters</p> <p>(NB: both are advertised on: <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a>)</p>	<p>A CCC has been established and details are available on the Project website. .</p> <p>Quarterly meetings are scheduled, the latest occurring on 21/2/23.</p> <p>Information on the Project and the CCC minutes are available on the website.</p>	
5.3	<p><b>Community Consultative Committee (CCC)</b></p> <p>CCC meetings will take place at least quarterly and align with the construction milestones outlined in Section 3.1 of this document. As part of the CCC establishment phase, the proponent has been appointed an Independent Chairperson from the DPIE. The Independent Chairperson will then support the proponent call for nominations for the community representatives.</p>	C	<p>1. Community Consultative Committee</p> <p>2. Community Update Newsletters</p> <p>(NB: both are advertised on: <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a>)</p>	<p>A CCC has been established and advertised on the Applicant's website.</p> <p>Quarterly meetings are scheduled, the latest occurring on 21/2/23.</p> <p>Information on the Project and the CCC minutes are available on the website. The next CCC meeting will be held in May 2023.</p> <p>An independent chair has been nominated for the CCC.</p>	
6	<p><b>Enquiries and feedback response</b></p> <p>All Stage 1 construction-related enquiries feedback and enquiries will be recorded in a Complaints Register. All feedback and enquiries during construction will be answered in accordance with the timeframes below.</p>	C	<p>1. Complaint Register</p> <p>2. Audit interviews</p>	<p>A copy of the register of complaints was observed during the audit.</p> <p>The Auditee confirmed that there no complaints made during the audit period.</p>	
C16	<b>Construction Pedestrian and Traffic Management Plan (CPTMP)</b>				
4.2	<p>Truck arrivals and departures are to be managed so that no trucks are permitted to queue on Osborn Road and Mount Pleasant Avenue or surrounding streets at any time.</p>	C	<p>1. Site inspection</p>	<p>Substage 1 -3 were completed prior to the site inspection, therefore there were no truck movements associated with the School redevelopment works at the time of this IEA.</p> <p>substage 4 yet to commence.</p>	
4.3	<p>Approved hours of construction and rock breaking /hammering activities</p>	C	<p>1. Audit interviews</p>	<p>Substage 1 -3 were completed prior to the site inspection, therefore there were no rock breaking/hammering activities occurring at the time of this IEA.</p> <p>substage 4 yet to commence</p>	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
4.4	All loading/unloading will occur on the site. Cranes and concrete pumps will also be positioned within the site. The following temporary removal of on-street parking along Osborn Road and Mount Pleasant Avenue via a Work Permit to accommodate the 12.5m HRV and 19m semi swept path clearances: - 18m long (up to 3 on-street spaces) along the western side of Osborn Road - 25m long (up to 4 on-street spaces) along the western side of Mount Pleasant Avenue - 35m long (up to 6 on-street spaces) along the western side of Mount Pleasant Avenue	C	1. Audit interviews 2. Site inspection	Substage 1 -3 were completed prior to the site inspection with substage 4 yet to commence, therefore there was no loading/unloading activities occurring at the time of the IEA.	
4.6	All workers and visitors employed on the site by the appointed contractor (including sub-contractors) will be required to undergo a formal 'site induction' process and all the inductions will be performed specifically to each trade according to Workcover OH & S requirements.	C	1. Induction records 2. Completed induction 3. SWMS 4. Audit interviews	Induction records and site specific SWMS were observed during the audit for substages 1 -3. The Auditee confirmed that the same process will apply for substage 4.	
4.7	It is anticipated that there will be the following average and maximum number of workers (employees and contractors) during the construction period: - Substage 1: 15 (average); 30 (maximum) - Substage 2: 20 (average); 40 (maximum) - Substage 3: 25 (average); 50 (maximum)	C	1. CTMP 2. Site inspection 3. Audit interviews	The Auditee confirmed that the requirement for noise monitoring was not triggered during the audit period.	
4.8	There will be no on-site parking for construction workers during the school term. Workers will be directed not to use on-street parking along Mount Pleasant Avenue, Osborn Road and Currawong Avenue, as well as within the School's compound. COWYN would take appropriate action if informed of this activity occurring. This will be incorporated into the site induction program.	C	1. Site inspection 2. Audit interviews	Substage 1 -3 were completed prior to the site inspection and substage 4 is yet to commence. Observations during the site inspection confirmed that there were no construction workers present at the site.	
4.9	A tool drop-off and storage facility will be provided within the site. This would allow tradespeople to drop-off and store their tools and machinery, allowing them to use public transport to travel to/ from the site on a daily basis. Workers will also be informed of with appropriate tool/ equipment drop-off and storage arrangements made within site sheds and amenities provided on site.	C	1. Site inspection	Substage 1 -3 were completed prior to the site inspection. All equipment and construction facilities (site compounds and storage facilities) had been removed at the time of inspection.	
4.10.	Road and western side of Mount Pleasant Avenue will be protected by temporary construction fencing. RMS accredited traffic controllers/trained on-site personnel will supervise all vehicle and materials movements into and out of the site as well as loading/unloading activities across the driveways at all times.	C	1. Site Inspection	Substage 1 -3 were completed prior to the site inspection, therefore no traffic control was required.	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
4.11	Temporary site security and dust fencing will be installed along the site boundary.	C	1. Site inspection	Works associated with substages 1 - 3 were complete at the time of this IEA - all temporary fencing had been removed. Temporary security fencing was observed along the site boundary for Substage 4 (Buildings had been removed in preparation of substage building works commencing)	
4.15	The contractor would prepare notification letters, under the approval of Council, that would be emailed to adjoining property owners, to advise of the timeframes for completion of each phase of the development/construction process. The notification will be provided a minimum of 14 days prior to the implementation of any temporary traffic	C	1. Community Consultative Committee Meeting minutes (16/8/22, 8/11/22, 21/2/23) 2. Community Update Newsletters (July 2022) 3. <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a>	Evidence of notification letters and consultation with neighbouring properties was observed during the IEA.	
4.16	Access to neighbouring properties will be maintained at all times. Workers/ subcontractors will be directed not to park their vehicles at the driveways of the neighbouring properties.	C	1. Site inspection	Substages 1 - 3 were complete at the time of this IEA. Neighbouring property access was observed to be clear at the time of the site inspection.	
4.17	To ensure that soil/excavated material is not transported on wheels or tracks of vehicles or plant and deposited on surrounding roadways, wheel wash station will be positioned at the entry/exit point.	NC	1. Site inspection 2. Audit interviews	<i>The clause in the CPTMP required a wheel wash station to be located at the entry / exit point at the time of the site inspection.</i> This was identified as a NC in the initial 2022 IEA, however substages 1 - 3 were complete at the time of this IEA, therefore the action was not implemented retrospectively. Observations made during the site inspection for this IEA confirmed that there was no evidence of soil tracked onto Mount Pleasant Avenue.	<b>NC - 08</b>
4.18	The contractor will be responsible for ensuring that the road pavement, kerb and gutter along Osborn Road and Mount Pleasant Avenue, remain in clean and serviceable states during the course of the construction.	C	1. Site inspection	The roads and gutters inspected along Osbourne Road Mount Pleasant Avenue were clean and serviceable at the time of site inspection	
<b>C18</b>	<b>Construction Soil and Water Management Plan (CSWMP)</b>				
4	<b>Site Storage and Stockpile Locations:</b> Material storage areas are located within the site as detailed on the Construction Management Plans within Appendix A.	C	1. Site Inspection	Substages 1 - 3 were complete at the time of this IEA. Observations made during the site inspection confirmed that no materials, storage containers or site compounds remained on site.	
6	<b>Erosion and Sediment Control:</b> - Erosion and sediment control plans have been prepared for each substage of the site to prevent sediment laden stormwater from flowing into adjoining properties or receiving water bodies. Stormwater controls are detailed in the attached erosion and sediment control plans in Appendix B - Cowyn has advised that additional siltation fencing will be provided around the perimeter of each storage zone to assist in sediment capture during storm events	C	1. Site Inspection	Substages 1 - 3 were complete at the time of this IEA. Observations made during the site inspection confirmed that all temporary ESC devices had been removed, the site had been left in a stable condition (landscaping complete etc) and there was no evidence of sediment build up in gutters/drains. Geofab had been installed over exposed soils in the works area for substage 4.	
<b>C17</b>	<b>Construction Noise and Vibration Management Plan (CNVMP)</b>				

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
4.4	<p><b>NOISE MITIGATION ACTIONS</b>  <b>Table 4-1 General Noise Impact Mitigation Control &amp; Action Measures</b></p> <ul style="list-style-type: none"> <li>- Provide an appropriate induction to site personnel (which includes Environmental Due Diligence Training) addressing the requirements of this Plan and their responsibilities with regard to noise and management</li> <li>- Ensure all equipment is equipped with appropriate noise control (e.g. mufflers, silenced exhausts, acoustic enclosures, and flashing lights as an alternative to revising beepers) and is turned off when not in use</li> <li>- Consider the use of temporary screens for mitigation of specific stationary noise sources, where identified, as causing excessive noise impact. If required, deploy screens in a way to ensure noise goals are met</li> </ul>	C	<ol style="list-style-type: none"> <li>1. Complaint register</li> <li>2. Site induction</li> <li>3. Audit interviews</li> </ol>	Evidence of the complaints records were observed during this IEA which included the following details: date, contributing condition/behaviours, description, comments and relevant attachments Environmental matters/awareness were included in the site induction for all personnel.	
5.4.1	<p><b>Noise Monitoring Locations</b>  Two locations have been selected for noise monitoring, consistent with the potentially sensitive boundary locations (Fig 5.1):</p> <ul style="list-style-type: none"> <li>A. The western site boundary of the development site adjacent to Osborn Road; and</li> <li>B. The eastern site boundary adjacent to Mount Pleasant Avenue</li> </ul>	NT	<ol style="list-style-type: none"> <li>1. Audit interviews</li> </ol>	The Auditee confirmed that the requirement for noise monitoring was not triggered during the audit period.	
5.4.2	<p><b>Noise Monitoring</b>  Noise levels will be monitored at each of the two locations in the circumstances described in 5.4, above.</p> <ul style="list-style-type: none"> <li>- Noise levels should be measured using a Type 1 or Type 2 Sound Level Meter</li> <li>- Measurements should be recorded over 15-minute periods</li> <li>- The LAeq, LA90, LMAX and LMIN parameters should be measured, and results recorded in a suitable field log or record.</li> <li>- A suitable Noise Monitoring Record Form for the recording of noise levels is provided at Appendix D</li> </ul> <p>Attended noise monitoring is recommended in the first instance. Continuous unattended monitoring will only be required if unresolved issues arise with any receivers regarding noise impacts</p> <p>Any identified noise level exceedances will be investigated to determine the cause, and to identify any necessary mitigation measures</p>	NT	<ol style="list-style-type: none"> <li>1. Audit interviews</li> </ol>	The Auditee confirmed that the requirement for noise monitoring was not triggered during the audit period.	



Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
5.4.3	<b>Instrumentation</b> The following procedures should be observed during noise measurement operations: - Ensure that the Sound Level Meter (SLM) used for monitoring has current laboratory calibration certification - Operate the SLM strictly in accordance with relevant guidelines - Ensure the windscreen is attached and that the SLM is set to A-weighted and fast response - Prior to and completing each sound level measurement, the SLM should be field calibrated using the calibrator supplied with the instrument - Ensure that the pre- and post- measurement calibrations do not differ by more than 0.5dB(A)	NT	1. Audit interviews	The Auditee confirmed that the requirement for noise monitoring was not triggered during the audit period.	
	<b>Conduct of Monitoring</b> The required monitoring can be undertaken by site personnel, if experienced with the use of sound level meters, or by the project acoustic consultant.	NT	1. Audit interviews	The Auditee confirmed that the requirement for noise monitoring was not triggered during the audit period.	
7.4.2	<b>Communication &amp; Consultation</b> A suitable letter to be forwarded to all residential and other neighbours within a 100 metre radius of the development site, prior to the commencement of site works, advising that site preparation and construction works will be proceeding at the site over a certain estimated time frame; that all care will be taken to ensure that no undue impacts are imposed on neighbouring properties, and providing a site contact for any questions or complaints.	C	1. Letter box drop 2. Audit interview	Evidence of a letter box drop provided to surrounding neighbours was observed during the IEA for substages 1 - 3. The Auditee confirmed that the letterbox drop was yet to occur for substage 4.	
7.4.3	<b>Complaints Management</b> The following procedure will be followed in the case of any complaints received, either verbally or in writing: 1. All complaints received in relation to noise or other issues, including vibration and dust issues, will be recorded in an appropriate log. 2. In respect of noise, each complaint will be investigated and where the noise in question is in excess of allowable limits, appropriate noise amelioration measures will be put in place to mitigate future occurrences. 3. In respect of vibration or other issues, each complaint will be investigated, and if needed advice and assistance sought from the developer's environmental consultant or otherwise. 4. A written response will be provided to all complainants, advising the outcome of the investigation of the complaint, and any relevant actions taken.	C	1. Complaint register 2. Site induction 3. Audit interviews	Evidence of a noise complaint record was observed during the IEA (however was outside of this audit period). The record included the following detail: date, contributing condition/behaviours, description, comments and relevant attachments such as correspondence with the complainant. The noise complaint, investigation and corrective actions were logged on the Feedback and Inquires Register, which also included details of the written response being provided to the complainant.	

Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
11.3.1	<p><b>Environmental Management Review</b></p> <p>The effectiveness and proper implementation of the Plan will be reviewed by the Cowyn Building Group in consultation with the appointed site supervisor(s) and the Cowyn Building Group's acoustic consultant or other advisors as required at a minimum of every six months or sooner as necessary during the course of the project.</p>	NC	<p>1. Audit interview</p> <p>2. SE220007.01 Loreto Normanhurst IEA Audit Report Rev 3 (Epic Environmental, 22/03/2023)</p>	<p><i>This clause in the CNVMP requires an environmental management review with Cowyn and the acoustic consultant (or adviser) be undertaken every 6 months.</i></p> <p>No evidence of an environmental management review being undertaken within 6 months of the project commencing was observed. Substages 1 - 3 were completed prior to this IEA, therefore the action to address the NC identified in the initial 2022 IEA was not implemented retrospectively.</p>	NC - 09
11.3.2	<p><b>Continuous Improvement</b></p> <p>The continual improvement process will, on a minimum six-monthly basis:</p> <ul style="list-style-type: none"> <li>- Review the adequacy of this Plan; and</li> <li>- Consider any recent developments in practices and technology to ensure best management practices are followed to minimise noise impacts</li> </ul> <p><b>On a minimum quarterly basis:</b></p> <ul style="list-style-type: none"> <li>- Review noise monitoring results and identify areas of opportunity for improvement of noise management which can contribute in a practical and cost-effective way to improved performance</li> </ul>	NC	<p>1. Audit interview</p> <p>2. SE220007.01 Loreto Normanhurst IEA Audit Report Rev 3 (Epic Environmental, 22/03/2023)</p>	<p>This item was identified as a NC in the previous IEA. The findings were:</p> <p><i>This clause of the CNVMP requires an review and continual improvement of the plan every 6 months and a review of noise monitoring every 3 months.</i></p> <p>No evidence of a review or update of the plan was observed in the 6 months since the plan was completed.</p> <p>Substages 1 - 3 were completed prior to this IEA, therefore the action to address the NC identified in the initial 2022 IEA was not implemented retrospectively.</p>	

**APPENDIX E SITE INSPECTION PHOTOS**



**Plate P1. Landscaping along driveway edge**



**Plate P2. Internal link with finished landscaping.**



Plate P3. Carpark directional signage for entry /exit



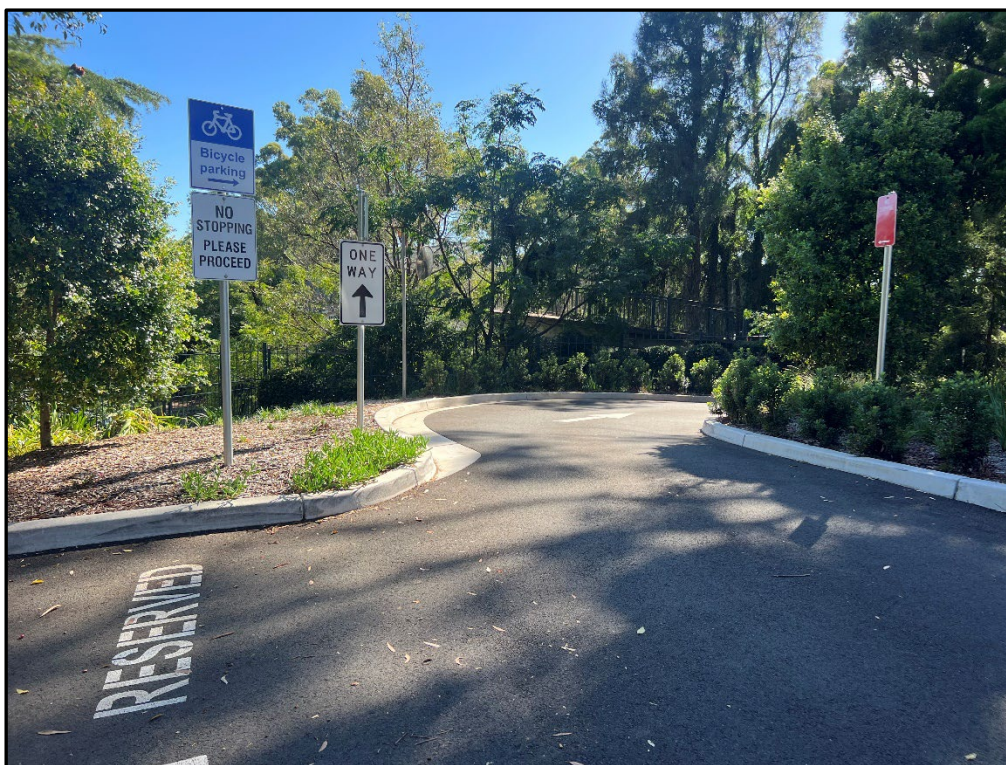
Plate P4. Directional Signage in the new carpark; firefighting equipment/signage



**Plate P5. Finished internal link road ; drop off / pick up zone**



**Plate P6. Directional signage for drop off/pick up zone**



**Plate P7. Directional signage – internal road**



**Plate P8. Bollards installed at heritage gate.**



Plate P9. Substage 4 – Geofab installed over exposed soil



Plate P10. Signage and screening on fence at substage 4 Boarding House location

**APPENDIX F IEA ACTION PLAN**





**Loreto Normanhurst School Redevelopment  
Independent Environmental Audit - Action Plan**

Recommendation Identification	Relevant Condition / Section	Requirement (Exact Wording)	Corresponding Finding	IEA Findings	Recommendation	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
NC - 01	A19	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document for information or approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved	Non-Compliant	This condition requires for consultation triggered by the consent to be undertaken prior to submission of the document for approval. Such consultation is required under sub-clauses: •C5(a) (Pre-Construction Dilapidation Survey Report) •C16(b) (Construction Pedestrian and Traffic Management Sub Plan) •C18(a) (Construction Soil and Water Management Plan) Consultation with asset owners under condition C5(a) was in progress for substage 4 at the time of this IEA. Consultation required under C16(b) and C18(a) was identified as a NC in the initial 2022 IEA. Evidence had not been sought as substages 1 - 3 were complete at the time of this IEA and future stages will require new management plans.	Prior to the commencement of sub-stage 4 provide management plans as required under conditions A19, C5(a), C16(b) and C18(a) to the relevant stakeholders for comment. Document consultation with relevant stakeholders and update the management plans accordingly. Provide the updated management plans to the Planning Secretary including records of completed consultation. <del>Prior to the commencement of sub-stages 4-6 provide management plans to the relevant stakeholders for comment.</del>	No action undertaken for sub-stages 1 -3 as works were complete at the time of this IEA and new management plans / reports for each future sub-stage will be developed. Prior to the commencement of sub-stage 4 the Principal will undertake consultation in accordance with the requirements of condition A19, specifically: •Consultation is currently in progress for impacted asset owners regarding pre-construction dilapidation •The Construction Pedestrian and Traffic Management Plan (CPTMP) will be provided to Council and TfNSW for comment •The Construction Soil and Water Management Plan (CSWMP) will be provided to Council for comment •The updated CPTMP and CSWMP will be provided to the Planning Secretary including records of completed consultation <del>Prior to the commencement of sub-stages 4-6: -The Construction Pedestrian and Traffic Management Plan (CPTMP) will be provided to Council and TfNSW for comment. -The Construction Soil and Water Management Plan (CSWMP) will be provided to Council for comment -The updated CPTMP and CSWMP will be provided to the Planning Secretary including records of completed consultation.</del>	04/01/2024 <del>1/07/2023</del>
	C16(b)	A 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: (b) be prepared in consultation with Council and TfNSW;		Sub-condition C16(b) was identified as a NC in the initial 2022 IEA. Sub-condition C16(a) requires the CTPMSP to be prepared in consultation with Council and TfNSW, however no evidence of consultation was provided during this IEA. Substage 1 -3 were complete prior to the initial 2022 IEA being issued to the Planning Secretary, therefore the CTPMSP was not updated retrospectively.			
	C18(a)	The Applicant must prepare a Construction Soil and Water Management Plan (CSWMP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council		Sub-condition C18(a) was identified as a NC in the initial 2022 IEA. Sub-condition C18(a) requires the CSWMP to be prepared in consultation with Council, however no evidence of consultation was provided during this IEA. Substage 1 -3 were complete prior to the initial 2022 IEA being issued to the Planning Secretary, therefore the CSWMP was not updated retrospectively.			
NC - 02	A36	Within three months of: (a) the submission of a compliance report under Schedule 3 condition A38; (b) the submission of an incident report under Schedule 3 condition A32; (c) the submission of an Independent Audit under Schedule 3 condition D37; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under Schedule 3 condition A2 which requires a review  the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	Non-Compliant	The initial IEA was undertaken between June and July 2022, with the IEA report submitted to the Planning Secretary in October 2022. Subsequently the Planning Secretary requested additional information be provided in relation to the IEA (dated 17/02/2023 and 21/03/2023). All items were addressed, and a final report was submitted and accepted by the Department in March 2023. The requirement to undertake a review of the strategies, plans and programs required under this consent within 3 months of A36(c) the submission of an Independent Audit under Schedule 3 condition D37 did not occur as works for substage 1 - 3 were complete prior to the submission of the initial 2022 IEA Report.	All relevant strategies, plans and programs required under this consent to be reviewed (where relevant) and the Planning Secretary and the Certifier to be notified in writing in accordance with the requirements of this condition.	No action undertaken for sub-stages 1 -3 as works were complete at the time of this IEA. The Principal will ensure all relevant strategies, plans and programs required under this consent will be reviewed, and the Planning Secretary and the Certifier will be notified in writing that a review is being carried out in accordance with the requirements of this condition.	As required by this condition
NC - 03	A38	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).	Non-Compliant	Table 1 of the Independent Audit Post Approval Requirements (2020) requires the initial IEA be undertaken within 12 weeks of the commencement of construction and then at intervals no greater than 26 weeks from the date of the initial independent audit. The initial 2022 IEA was undertaken 16 June 2022 (was due in March 2022), with the IEA report submitted to DPE 10 November 2022. This IEA was due to be undertaken in December 2022, however it was completed in March 2023, outside the timelines prescribed in the Independent Audit Post Approval Requirements (2020).	All future IEA's to be undertaken in accordance with the Compliance Reporting Post Approval Requirements (2020) and IEA reports to be submitted to the planning Secretary within the specified timeframe.	The Principal will ensure all future IEA's are undertaken in accordance with the guideline and the IEA reports are submitted to the Department within the specified timeframe.	As required by this condition <del>1/12/2023</del>
	A39	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.					

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NC - 04	C4	Prior to any demolition and/or alteration works commencing on the site in Stage 1 on the site, archival photographic recordings must be undertaken for significant building fabric and spaces, as specified by a qualified heritage consultant. The archival recordings must specifically include a detailed account of internal and external components of the buildings / spaces and context photographs of the existing site as viewed from the street and its surroundings. A copy of the final recordings must be submitted to the Certifier and Council for information.	Non-Compliant	"The majority of the requirements of this conditions were complied with for substage 1 - 3, however a copy of the final recordings was not submitted to Council. Substages 1 - 3 were completed at the time of this IEA. The Auditee confirmed that prior to substage 4 - 6, the archival recordings will be provided to Council for information as required by this condition.	Provide archival recordings to Council for information as required by this condition.	Prior to sub-stages 4–6 the archival recordings will be provided to Council for information as required by Condition C4.	04/01/2024 1/07/2023
NC - 05	C13	Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). <b>Notes:</b> • The Environmental Management Plan Guideline is available on the Planning Portal at: <a href="https://www.planningportal.nsw.gov.au/majorprojects/assessment/post-approval">https://www.planningportal.nsw.gov.au/majorprojects/assessment/post-approval</a> • The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans	Non-Compliant	A review of the CEMP and subplans addressed most of the requirements in the Environmental Management Plan Guideline, however there were several elements that were not addressed. Substages 1 - 3 were complete prior to the final 2022 IEA being submitted to the Planning Secretary, therefore the plans were not amended retrospectively. The Auditee confirmed that substage 4 was yet to be commence and stated that the requirements of this condition will be forwarded to the awarded construction contractors.	The CEMP, and relevant sub-plans for substage 4 –6 to address the requirements of the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> .	No action undertaken for sub-stages 1 -3 as works were complete at the time of this IEA. In the scoping of sub-stage 4, the Principal will ensure the construction contractor is informed of the requirements of this condition. Prior to the commencement of sub-stages 4 – 6, the CEMP, CPTMP and CSWMP are to address the requirements of the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> .	04/01/2024 1/07/2023
NC - 06	D9	The Applicant must carry out the construction of the development in accordance with the most recent version of the submitted CEMP (including Sub-Plans).	Non-Compliant	The initial 2022 IEA identified NC's for the Implementation of the CEMP and associated sub-plans: • One element of the CSWMP not implemented • One element of the CPTMP not implemented • Two elements of the CNVMP not implemented Sub-stage 1 - 3 were complete at the time of the submission of the initial 2022 IEA to the Planning Secretary, therefore the relevant management plans did not undergo a review and update, nor did confirmation the required updates were implemented on site.	Ensure the management measures implemented onsite are in accordance with the commitments made in the CEMP and sub-plans: - The Contractor's waste register is to identify the fate (i.e. reused, recycled, stockpiled or disposed) of the waste material leaving site for substage 4 –6.	No action undertaken for substages 1 -3 as works were complete at the time of this IEA. In the scoping of sub-stage 4, the Applicant will ensure the construction contractor is informed of the requirement to maintain a waste register that identifies: • Type of waste • Quantities of waste • Rate (i.e. reused, recycled, stockpiled or disposed) of the waste material leaving site • Date and when the waste was reused, recycled, stockpiled or disposed of • Name and waste transport licence of transporter used In the scoping of sub-stages 4 – 6, the principal will ensure the Contractor has the requirement to maintain a waste register that identifies the fate (i.e. reused, recycled, stockpiled or disposed) of the waste material leaving site.	04/01/2024 1/07/2023
	CWMSPP s8.2	Waste Management Register A waste management register (Appendix A) will be maintained and include the following information: • Type of waste and its classification (according to the POEO Act and Waste Classification Guidelines). • Quantities of waste, measured in tonnes. • How and where the waste was reused, recycled, stockpiled or disposed of. • date when the waste was reused, recycled, stockpiled or disposed of; and • name and waste transport licence (if applicable) of the transporter used. Waste information will include details of the date waste was reused, recycled, stockpiled or disposed, quantity and disposal location.					
	D32	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.		An up to date register identified segregated waste that was collected and transported off-site was provided during the IEA. It is not clear from reviewing the waste register what was earmarked for re-use or recycling			
NC - 07	D9	The Applicant must carry out the construction of the development in accordance with the most recent version of the submitted CEMP (including Sub-Plans).	Non-Compliant	The initial 2022 IEA identified NC's for the Implementation of the CEMP and associated sub-plans: • One element of the CSWMP not implemented • One element of the CPTMP not implemented • Two elements of the CNVMP not implemented Sub-stage 1 - 3 were complete at the time of the submission of the initial 2022 IEA to the Planning Secretary, therefore the relevant management plans did not undergo a review and update, nor did confirmation the required updates were implemented on site.	Ensure the management measures implemented onsite are in accordance with the commitments made in the CEMP and sub-plans. - The CNVMP is to include a commitment to review and update the management plan in the event an investigation of a complaint determines further mitigation measures are required.	No action undertaken for substages 1 -3 as works were complete at the time of this IEA. Prior to the commencement of construction of sub-stages 4 - 6, review and update s4.17 of the CPTMP confirm the mitigation measures implemented on site reflect the commitments made in the CPTMP. Prior to the commencement of sub-stages 4 – 6, review and update s4.17 of the CPTMP to replace the wheel wash requirement with alternative measures to achieve the same outcome. Examples of alternative measures include: • Daily inspections by the site manager and deploying street sweeper if required • Vehicles entering and leaving the site must be directed to hardstand areas –	04/01/2024 1/07/2023
	CPTMP s4.17	To ensure that soil/excavated material is not transported on wheels or tracks of vehicles or plant and deposited on surrounding roadways, wheel wash station will be positioned at the entry/exit point.  The clause in the CPTMP required a wheel wash station to be located at the entry / exit point at the time of the site inspection. This was identified as a NC in the initial 2022 IEA, however sub-stages 1 - 3 were complete at the time of this IEA, therefore the action was not implemented retrospectively. Observations made during the site inspection for this IEA confirmed that there was no evidence of soil tracked onto Mount Pleasant Avenue.					
NC - 08	D9	The Applicant must carry out the construction of the development in accordance with the most recent version of the submitted CEMP (including Sub-Plans).	Non-Compliant	Implementation of the CEMP and associated sub-plans were assessed as part of the IEA. This assessment identified: 1. One element of the CSWMP not implemented 2. One element of the CPTMP not implemented 3. Two elements of the CNVMP not implemented  Refer to the IEA findings for the CEMP and sub-plans for additional information.	The CNVMP for sub-stage 4 is to outline an appropriate schedule for the: • Review and update of the management plan • Review of noise monitoring • Persons to be involved in the reviews • Review the adequacy of the plan Ensure the management measures implemented onsite are in accordance with the commitments made in the CEMP and sub-plans: - Site inspection / audit checklists are to include all relevant commitments and requirements of the Development consent and management plans for construction.	No action undertaken for sub-stages 1 -3 as works were complete at the time of this IEA. The CNVMP for sub-stage 4 will include a schedule for the review and update of the plan and review of monitoring required. The Principal will ensure that reviews will be undertaken and documented in accordance with the plan. Sub-stage 1 –3 have been completed. Prior to the commencement of sub-stages 4 – 6, review and update s11.3.1 and 11.3.2 of the CNVMP to only require a review and update of the management plan in the event an investigation of a complaint determines further mitigation measures are required.	04/01/2024 1/07/2023
	CNVMP s11.3.1	<b>Environmental Management Review</b> The effectiveness and proper implementation of the Plan will be reviewed by the Cowyn Building Group in consultation with the appointed site supervisor(s) and the Cowyn Building Group's acoustic consultant or other advisors as required at a minimum of every six months or sooner as necessary during the course of the project.					
	CNVMP & 11.3.2	<b>Continuous Improvement</b> The continual improvement process will, on a minimum six-monthly basis: • Review the adequacy of this Plan; and • Consider any recent developments in practices and technology to ensure best management practices are followed to minimise noise impacts <b>On a minimum quarterly basis:</b> • Review noise monitoring results and identify areas of opportunity for improvement of noise management which can contribute in a practical and cost-effective way to improved performance		This clause in the CNVMP requires a review and continual improvement of the plan every 6 months and a review of noise monitoring every 3 months. No evidence of a review or update of the plan was observed in the 6 months since the plan was completed. Substages 1 - 3 were complete prior to this IEA, therefore the action to address the NC identified in the initial 2022 IEA was not implemented retrospectively.			

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NC-09	D38	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	Non -Compliant	The method for the initial 2022 IEA undertaken by Epic Environmental was developed and executed generally in accordance with the Independent Audit Post Approval Requirements (2020). In accordance with Table 1 of the Independent Audit Post Approval Requirements (2020), the initial IEA is required to be undertaken within 12 weeks of the commencement of construction (14 March 2022), however it was undertaken 16 June 2022 and therefore after the deadline prescribed in Table 1 of the Independent Audit Post Approval Requirements (2020).	All future IEAs are to be undertaken in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> .	All future IEAs will be undertaken in accordance with the requirements of the <i>Independent Audit Post Approval Requirements (2020)</i> .	As per the guideline
NC-10	D40	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under Schedule 3 condition D38 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 after submission to the Planning Secretary.	Non -Compliant	The initial 2022 IEA Report was submitted to the Planning Secretary, however no evidence of it being submitted to the certifier was obtained during this IEA. The initial 2022 IEA Report was not made publicly available within 60 days after submission to the Planning Secretary (submitted October 2022) Note: the Planning Secretary requested additional information in February and March 2023. Based on these dates, the IEA is to be made publicly available in May 2023. This IEA is to be made publicly available in July 2023.	All future IEAs are to: •Review and respond to audit findings for each IEA undertaken •Submit response to the Planning Secretary and the Certifier •Publish each IEA on the Applicant's website within 60 days of the submission of the IEA. <del>Schedule all future IEAs in accordance with the Independent Audit Post Approval Requirements (2020).</del>	All future IEAs will be undertaken in accordance with the specific requirements of this condition. <del>All future IEAs will be undertaken in accordance with the schedule outlined in Table 1 of the Independent Audit Post Approval Requirements (2020).</del>	As per the guideline
NC-11	D41	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 Requirements (2020), unless otherwise agreed by the Planning Secretary.	Non -Compliant	The initial 2022 IEA Report was submitted to the Planning Secretary outside of the required timeframe prescribed in the Independent Audit Post Approval Requirements (2020).	Submit all future IEA Reports in accordance with the schedule outlined in Table 1 of the <i>Independent Audit Post Approval Requirements (2020)</i> .	The Principal will submit this IEA Report <b>and all future audit reports</b> to the Planning Secretary within the required timeframe.	As per the guideline
OFI - 01	D16	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time).	Compliant	<del>The CVMP for substage 1 - 3 references noise limits sourced from the NSW Industrial Noise Policy, Noise Policy for Industry (2017), which is different to the standards prescribed in the condition. The Auditee confirmed that no vibration monitoring was been triggered by the scope of works. The Auditee confirmed that this will be addressed for substage 4 prior to work commencing</del> The CNVMP references noise limits sourced from the NSW Industrial Noise Policy, Noise Policy for Industry (2017), which is different to the standards prescribed in the condition. = Although this condition is compliant as no vibration monitoring was triggered, the discrepancy for the noise limits to be complied with used should be rectified for future substages 4 – 6	The CNVMP for substages 4 - 6 are to address the criteria as prescribed by this condition	<del>No action undertaken for substages 1 - 3 as works were complete at the time of this IEA. The Principal will ensure the construction contractor is informed of the requirements of this condition and that the detail is to be included in the CVNMP.</del> No action undertaken for substages 1 – 3 as works were complete at the time of this IEA. The Principal will ensure the construction contractor is informed of the requirements of this condition and that the detail is to be included in the CVNMP.	04/01/2024 <del>1/07/2023</del>
OFI - 02	D32	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling, and disposal locations for the duration of construction.	Compliant	An up to date register identified segregated waste that was collected and transported off-site was provided during the IEA. It is not clear from reviewing the waste register what was is earmarked for re-use or recycling	The Contractor's waste register is to identify the fate (i.e. reused, recycled, stockpiled or disposed) of the waste material leaving site for substage 4 – 6.	In the scoping of sub-stages 4 - 6, the principal will ensure the Contractor has the requirement to maintain a the waste register that identifies the fate (i.e. reused, recycled, stockpiled or disposed) of the waste material leaving site.	04/01/2024 <del>1/07/2023</del>
OFI - 03	CWMSP s1.2	<b>Environmental management systems overview:</b> EWMS will be developed and signed off by environment and management representatives prior to associated works and construction personnel will be required to undertake works in accordance with the identified mitigation and management measures.	Compliant	No documented evidence that supported the approval of the CWMSP was provided.	A document control sheet is to be included on the cover page of all management plans requiring a document approver to initial and approve the final revision of the document.	Sub-stage 1 - 3 have been completed and action is no longer applicable. This will be taken as a note for CTPG's review of documentation prepared by future contractors.	04/01/2024 <del>1/07/2023</del>
OFI - 04	CWMSP s7.4	Monitoring and inspection Weekly Environmental Inspections that includes waste management. ● As required document and record the types and volumes of wastes generated, reused, recycled and disposed of - Waste records ● As required document and record the locations of stockpiled and stored waste ● Update the Waste Management Register monthly of all waste collected for disposal and/or recycling until final completion in accordance with the RMS G36 specification ● Compile and record monthly resource usage during construction works (e.g. energy, water, fuel, oil, etc ● As required record any results of any soil, surface or groundwater sampling ● The Waste Contractors are to maintain and document the types and volumes of wastes collected recycled and disposed of. They are to provide monthly reports on waste removal and disposal activities to Cowyn Building Group	Compliant	Monitoring and inspection records observed during the IEA included those listed in the CWMSP. A monthly report from the waste contractor was not observed during the IEA.	Monthly waste reports to include the following detail for waste removed offsite: - Type of waste - Volume/quantity of each waste type - Destination and fate of waste	<del>No action undertaken for substages 1 - 3 as works were complete at the time of this IEA. For sub-stage 4, The Principal will During sub-stages 4 – 6, request the waste contractor provide a monthly report – The monthly report should that includes the following detail for waste removed offsite (for the previous month), including the:</del> No action undertaken for substages 1 - 3 as works were complete at the time of this IEA. For sub-stage 4, The Principal will During sub-stages 4 – 6, request the waste contractor provide a monthly report – The monthly report should that includes the following detail for waste removed offsite (for the previous month), including the: - Type of waste - Volume/quantity of each waste type - Destination and fate of waste (e.g. landfill, recycled, reused etc)	04/01/2024 <del>1/07/2023</del>





## CONTACT US

🌐 [www.epicenvironmental.com.au](http://www.epicenvironmental.com.au)

🌐 <https://www.linkedin.com/company/epic-environmental-pty-ltd/>

☎ 1800 779 363

✉ [enquiries@epicenvironmental.com.au](mailto:enquiries@epicenvironmental.com.au)