



**SSD8996 - Independent Environmental Audit Report**

**Carmichael Tompkins Property Group**

**Redevelopment of the Loreto Normanhurst Secondary School**

**Normanhurst, NSW**

**SE22009.01**

**12 October 2022**

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<b>Project manager:</b>	Gary Bagwell
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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) construction works at the Loreto Normanhurst School (the site). This document outlines the method, findings, and recommended actions of the 2022 IEA. The IEA was undertaken between 16 June 2022 to 29 July 2022. The IEA scope included activities undertaken between November 2021 and June 2022. Construction works on sub-stages commenced on 20 December 2021.

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 139 individual Development Consent conditions and 55 management requirements. Across the IEA criteria a total of twelve non-compliances were identified.

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:

- The required consultation for the preparation of the Construction Pedestrian and Traffic Management Plan (CPTMP) and Construction Soil and Water Management Plan (CSWMP) could not be verified
- No evidence of the archival records being provided to Council was provided
- 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*
- The retirement of credits or payment to the Biodiversity Conservation Fund was not provided to the Planning Secretary prior to commencement of construction
- Based on Table 1 of the *Independent Audit Post Approval Requirements (2020)* the initial IEA due on 14 March 2022. This IEA was undertaken 16 June 2022 and therefore was after the deadline prescribed under the *Independent Audit Post Approval Requirements (2020)*
- The waste disposal register did not describe the ultimate fate of material leaving the site (i.e. reused, recycled, stockpiled, or disposed) as required in the CSWMP
- A wheel wash station was not positioned at the entry/exit point of the site
- A review of the Construction Noise and Vibration Management Plan (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 Construction Noise and Vibration Management Plan (CNVMP)

### 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:

- 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
- Update the CEMP, CPTMP and CSWMP to address the requirements of the *Environmental Management Plan Guideline: Guideline for Infrastructure Projects*
- The Applicant should notify the Planning Secretary of the non-compliance of condition C25 via submission of the IEA report
- 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
- Review and update section 4.17 of the CPTMP to remove the requirement for a wheel wash at the site entrance and replace the wheel wash requirements with alternative measures, such as daily inspections, deploying street sweeper if required and vehicles entering and leaving the site must be directed to hardstand areas
- Review and update sections 11.3.1 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

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 (comprising of sub-stages 1, 2 & 3) construction works 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 16 June 2022 and 29 July 2022. 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 in turn has 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)	23 November 2021 – 6 June 2022
IEA site inspection	16 June 2022
IEA document review	16 June – 29 July 2022
Status of works during site inspection	- Sub-stages 1 & 2 completed - Sub-stage 3 underway - Sub-stages 4 – 6 not 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 1/06/2022 (**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
Romin Nejad	Lead Auditor	17	Lead Auditor (Exemplar Global, No. 115361), BEng (Env), GCert Env Mgmt, GCert Carbon Mgmt, MBA
Gary Bagwell	PM and Auditor Assistant	20	BEng (Chem), MEL

### 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 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 (DPI&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 2**.

**Table 3. IEA Program**

Proposed Date	Task / Description	Participants
<b>Phase I Project Preparations</b>		
03/06/22	Provision of management plans required for the IEA	Contactor & CTPG
10/06/22	Preparation and provision of IEA Plan	IEA Team
13/06/22 – 15/06/22	Undertake a preliminary document review	IEA Team
13/06/22 – 15/06/22	Develop the IEA checklist and questionnaire	IEA Team
<b>Phase II – Site Inspections and Interviews</b>		
16/06/22	Opening Meeting	All
16/06/22	Site inspection	IEA Team & Contactor
16/06/22 – 28/07/22	IEA Interviews	Contactor & CTPG
17/06/22 – 29/08/22	Evidence provision and collation	Contactor & CTPG
<b>Phase III – IEA Reporting</b>		
29/07/22 – 28/09/22	Detailed evidence review, and recommended	IEA Team
28/09/22 – 07/10/22	Prepare draft report for review	IEA Team
12/10/22	Closing Meeting and recommended actions review	All
12/10/22	Issue the final IEA report	IEA Team

### 2.3 Pre-Audit Consultation

Upon engagement, the IEA team held a kick-off meeting with the Contactor & 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 June 2022 to visually verify compliance with the IEA criteria. Weather on the day of the site inspection was overcast, with a low of 9°C with a high of 22 °C (BOM, 2022).

Approximately 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 no rain. 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

A number of key staff were interviewed during the IEA, including:

- Representatives from the Contractor, including:
  - Managing Director: Marc Cohen
  - Project Manager: Hugh Wilson
  - Site Manager: Kell Portass
- Representative from CTPG - Project Manager: Luke Gladwish

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 and Contractor 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

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

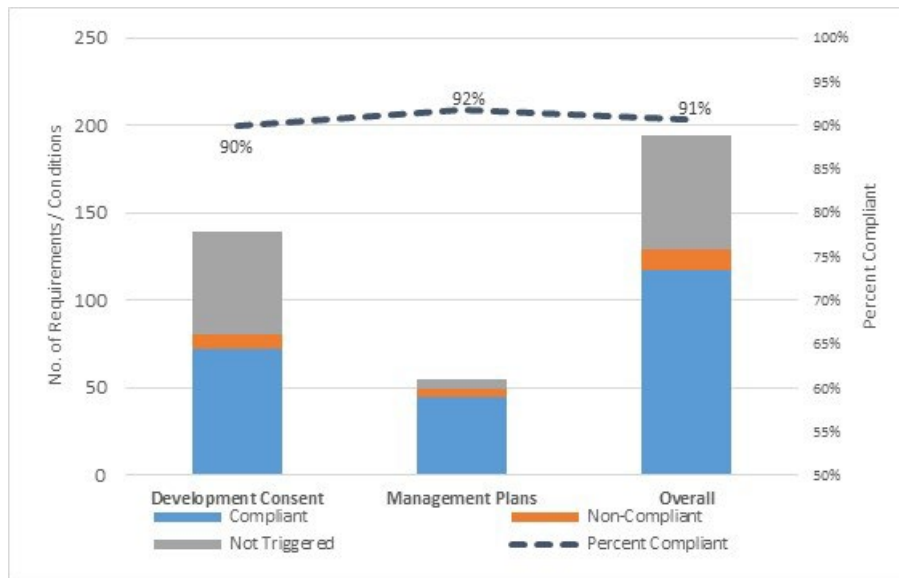
### 3 IEA FINDINGS

#### 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 139 individual Development Consent conditions were audited across the IEA criteria with 60 of those conditions classified as not triggered (NT) and eight non-compliances (NCs) at the time of the IEA. An additional 54 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
- Record management was of a high level and evidence was easily identified by the environmental team
- A Community Consultation Strategy has been developed and implemented, including the establishment of a Community Consultative Committee
- Effective management of environmental risks on site and evidence of measures implemented on site to prevent material harm to the environment including:
  - Suitable erosion and sediment controls were observed to be implemented across the site (see Plates 1 - 3, **Appendix E**)
  - Street sweeping was occurring at the time of the audit as well as other dust management measures (see Plate 4, **Appendix E**)
  - A dedicated and secure waste storage area was located within the site and was well maintained (see Plate 5, **Appendix E**)

- Works were conformant with the approved staging schedule

### 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 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
- Management plans had been implemented
- Site inspections were completed
- The required waste records were maintained and up to date
- Stormwater management on the site was undertaken in accordance with the conditions
- Training was provided to personnel and drivers

Eight non-compliance were identified during the IEA these have been detailed in **Table 5**.

**Table 5. IEA Findings – Development Consent**

Condition	Requirement	Assessment	IEA Finding
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	(a) 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) was completed (refer <b>Appendix G</b> ), the consultation required under C16(b) and C18(a) was not confirmed during the IEA. (b) The condition requires records of such consultation to be provided. Evidence of consultation required under C5(a) was observed during the IEA, however no response had been received from the consulted parties. No such evidence was available for consultation required under conditions C16(b) and C18(a).
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 condition requires a copy of the archival recordings be submitted to the Certifier and Council for information. Evidence of archival recordings required under the condition being supplied to the Certifier and the Department of Planning and Environment was observed during the IEA. No evidence of the archival recordings being provided to Council for information was provided during the IEA.

Condition	Requirement	Assessment	IEA Finding
C13	<p>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).</p> <p><b>Notes:</b></p> <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	<p>The CEMP and required sub-plans required under the development consent were provided during the IEA. The CEMP was reviewed against the content requirements for a management plan as outlined in s4.2 and s4.3 of the <i>Environmental Management Plan Guideline (the guideline)</i> and it was identified the CEMP did <b>not</b> include the following elements required by the guideline:</p> <ol style="list-style-type: none"> <li>An environmental Policy</li> <li>Details of the approvals required for the works, including all conditions applicable to the scope of works</li> <li>An environmental control plan or map</li> <li>The CEMP review requirements.</li> </ol> <p>The sub-plans were also reviewed against the guideline and the following was determined:</p> <ol style="list-style-type: none"> <li>The CPTMP did not include responsibilities, objectives, reporting requirements, risk assessment, monitoring requirements, corrective actions and review requirements</li> <li>the CNVMP generally addressed the requirements of the guideline</li> <li>The CSWMP did not include a project description, objectives, responsibilities, reporting requirements, risk assessment, monitoring requirements and corrective actions</li> <li>The CWMP generally addressed the requirements of the guideline</li> </ol>
C16(b)	<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>.....</p>	Non-Compliant	<p>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 identified.</p>
C18(a)	<p>The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) 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>.....</p>	Non-Compliant	<p>Sub-condition C18(a) requires for the CSWMP to be prepared in consultation with Council. During the IEA no evidence of such consultation being completed was identified.</p>
C25	<p>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.</p>	Non-Compliant	<p>The condition requires evidence of the retirement of credits to be supplied to the Planning Secretary prior to the commencement of any construction works. The date of the submission of the evidence to the Planning Secretary was August 2022. Construction works had</p>

Condition	Requirement	Assessment	IEA Finding
			commenced prior to the submission of the evidence.
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
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 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> .

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 A**.

### 3.5 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 available and being maintained
- Suitable receptacles for waste segregation were observed at the site. Bins were not observed to be overflowing
- The documented training records were in accordance with the detail outlined in the CEMP
- Environmental inspections were being undertaken on a weekly basis and records maintained and included in the monthly reporting
- Erosion and sediment control implemented on site was generally in accordance with the CSWMP and there was no evidence of sediment leaving the site or obvious signs of contamination to waters

Four non-conformances were identified during the IEA:

- **Construction Waste Management Subplan (CWMSMP). Clause 8.2** the CWMSMP requires that Contractor record how and where waste material is reused, recycled, stockpiled, and disposed of. While the destination, transporter and date of material leaving the site is documented, 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. 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** of the CNVMP requires an environmental management review with Contractor and the acoustic consultant (or adviser) be undertaken every six months. No evidence of an environmental management review being undertaken within six months of the project commencing was observed.
  - **Clause 11.3.2** of the CNVMP requires a review and continual improvement of the plan every six months and a review of noise monitoring every three months. Whilst no noise monitoring has been undertaken to date, 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 A**.

### 3.6 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 6**.

**Table 6. 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 - SSDA 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



Reference EIS Document	Predicted Impact	Observed Actual Impact during the IEA	Compliance Assessment
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
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.	All vegetation clearing were 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.	All vegetation clearing were 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	All vegetation clearing were observed to be within the boundaries of the Stage 1 scope identified within the approved drawing/s. Specific tree retention	Compliant

Reference EIS Document	Predicted Impact	Observed Actual Impact during the IEA	Compliance Assessment
	replaced as part of the new Stage 1 landscape proposal.	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.	
Preliminary Site Investigation Report (Environmental Investigation Services, 30 April 2019)	<p>The site is considered to have potential for moderate contamination, due to:</p> <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, nearby bushland or roadways during the construction phase of the development.	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 placed with the DPE. The auditor has determined these complaints had been investigated and adequately addressed.	Compliant
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

### 3.7 Environmental Performance

Monitoring records were observed for the IEA period and demonstrated a high level of environmental performance across the site. The high-level of environmental performance was further verified during the site inspection.

### 3.8 Complaints

All complaints received are logged on the Feedback and Inquiries Register. This register is maintained by the Applicant’s representative (i.e. CTPG). The Feedback and Inquiries Register is a live document that is continuously updated by the Applicant’s representative.

The Feedback and Inquiries Register was observed during the IEA and included three complaints which we logged during the IEA period. A summary of these complaints received during the audit period have been provided in **Table 7**.

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>).

**Table 7. Complaint Summary**

Date of Complaint	Description of Complaint	Investigated Causal Factors	Project Response	Adequacy of Response
21 April 2022	Sediment laden water flowing from the construction site and discharging from an outlet on Pennant Hills Road onto the roadway and around the corner onto Mount Pleasant Avenue, Normanhurst.	Extensive rainfall received which was beyond the design capacity of the erosion and sediment control devices design. Suitable erosion and sediment control was confirmed.	1. An inspection of sediment and erosion controls was undertaken by the consulting engineer 2. Additional erosion and sediment controls installed as recommended by the consulting engineer 3. Complaint noted in the register and response provided to the DPE	Sufficient response noted
25 April 2022	Construction activities commencing at 6:15 am prior to the authorised start time of 7 am.	Investigated with the Contractor and noted no work had commenced prior to the authorised time. Evidence reviewed included daily attendance record.	Permitted hours of work listed as an agenda item on the Contractor’s toolbox talk which was delivered to all workers	Sufficient response noted
16 May 2022	Sediment from the site polluting the creek with sediment. Earthworks occurring without sufficient sediment control is not adequate. High turbidity was observed in the stormwater drain outside 15 Mount Pleasant Ave and ultimately into the creek the adjacent bushland at the bottom of Nicholas St.	CTPG disagreed with the premise of the complaint and provided evidence disputing the content. Evidence included: Statements from representatives and inspection reports.	No action deemed necessary and no further action requested by the DPE	No response was deemed necessary

### **3.9 Incidents**

No environmental incidents were noted during the IEA period.

## 4 RECOMMENDED ACTIONS

### 4.1 Non-Compliances

A total of twelve non-compliances (including eight against the development consent and four against the approved management plans) were identified during the IEA. Actions to address each of these matters has been provided in **Table 8**. 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 8. Recommended Actions to Resolve Identified Non-Compliances**

Unique Identification	Relevant Condition / Section	Recommended Actions
<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>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.</p>
NC-02	<p><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.</p>	<p>Provide the archival recordings to Council for information as required by Condition C4.</p>
NC-03	<p><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).</p>	<p>Update the CEMP, CPTMP and CSWMP to address the requirements of the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i>.</p>
NC-04	<p><b>C25, Biodiversity Conservation Fund:</b> 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.</p>	<p>As the non-compliance is 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.</p>

Unique Identification	Relevant Condition / Section	Recommended Actions
<b>CEMP and subplans</b>		
NC-05	<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>	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.
NC-06	<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>	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: <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>
NC-07 <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 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. 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><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</li> </ul>	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.

Unique Identification	Relevant Condition / Section	Recommended Actions
	<p>management practices are followed to minimise noise impacts.</p> <p>On a minimum quarterly basis:</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-08	<p><b>D38.</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 due date for the initial IEA was lapsed and no further actions can be applied to retrospectively to rectify the non-compliance. Notify the Planning Secretary of the non-compliance as part of the submission of this IEA report.</p> <p>Schedule all future IEAs in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i>.</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

A total of four opportunities for improvement were identified during the IEA. These opportunities for improvement have been provided as actions in **Table 9**. 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 9. Recommended Actions for Opportunities for Improvement**

Unique Identification	Relevant Condition / Section	Recommended Actions
<b>Development Consent</b>		
OFI-01	<p><b>D16:</b> Vibration caused by construction at any residence or structure outside the site must be limited to:</p> <p>(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</p> <p>(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).</p>	<p>Update the CNVMP to address the following vibration criteria:</p> <p>(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</p> <p>(b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006)</p>
OFI-02	<p><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.</p>	<p><b>As per NC-02:</b> 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.</p>
<b>CEMP and subplans</b>		
OFI-03	<p><b>CWMSP, s1.2 Environmental Management Systems Overview</b></p> <p>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</p>	<p>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.</p>

Unique Identification	Relevant Condition / Section	Recommended Actions
	identified mitigation and management measures.	
OFI-04	<p><b>CWMSP, s7.4 Monitoring and Inspection</b>            Regular waste monitoring and inspections will be undertaken during construction. These include:</p> <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> <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>	<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>



## 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 June 2022 and 29 July 2022 and captured evidence for the period November 2021 to June 2022. 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.

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

- The required consultation for the preparation of the CPTMP and CSWMP could not be verified
- No evidence of the archival records being provided to Council was able to be provided
- The CEMP and some associated sub-plans did not meet the minimum requirements of the *Environmental Management Plan Guideline: Guideline for Infrastructure Projects*
- Based on Table 1 of the *Independent Audit Post Approval Requirements (2020)* the initial IEA due on 14 March 2022. This IEA was undertaken 16 June 2022 and therefore was after the deadline prescribed under the *Independent Audit Post Approval Requirements (2020)*
- The waste disposal register did not describe the ultimate fate of material leaving the site (i.e. reused, recycled, stockpiled, or disposed) as required in the CSWMP
- A wheel wash station was not positioned at the entry/exit point of the site
- 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

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. All interpretations, finding 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:

- a. for the use or reliance of this report for any purpose other than that for which it has been prepared;
- b. for any use or reliance upon this report by any person other than the Client;
- c. where another person has a different interpretation of the same information contained in the report;
- d. 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.



Project name: **Redevelopment of the Loreto Normanhurst Secondary School**

## **APPENDIX A PLANNING SECRETARY IEA TEAM APPROVAL**



The Principal  
Loreto Normanhurst Ltd  
91-93 Pennant Hills Road  
Normanhurst NSW 2076

**Email:** [businessadmin@loretanh.nsw.edu.au](mailto:businessadmin@loretanh.nsw.edu.au)

01/06/2022

Dear Ms Ugonotti

**Loreto Normanhurst School Redevelopment (SSD-8996)  
Appointment of Independent Audit Team**

I refer to your request (**SSD-8996-PA-26**) for the Secretary's approval of suitably qualified persons to undertake the Independent Environmental Audit (**IEA**) for the Loreto Normanhurst School Redevelopment project SSD-8996 (**Consent**).

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

Consequently, as nominee of the Planning Secretary, I approve the appointment of the following audit team from Epic Environmental Pty Ltd in accordance with Condition D37 of the Consent to conduct the Independent Audit:

- Romin Nejad as lead auditor; and
- Gary Bagwell as assistant auditor.

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

In accordance with Condition D38 of the Consent, the IEA must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements (2020) which is available on the department's website. 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. Further, the department note that some of the Exemplar Global certifications for the above auditors will expire before the final audit for this project has been completed. Please note that this approval of the above audit team is conditional upon them maintaining certification as a lead or principal auditor with a relevant industry body.

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

Department of Planning and Environment



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.

Should you wish to discuss the matter further, please contact Maria Divis on 02 8275 1156 or [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  
Compliance

As nominee of the Planning Secretary



Project name: **Redevelopment of the Loreto Normanhurst Secondary School**

## **APPENDIX B INDEPENDENT AUDITOR DECLARATION FORM**



# Memo

<b>Date:</b>	31 August 2022
<b>To:</b>	Cowyn Building Group
<b>From:</b>	Romin Nejad, Epic Environmental
<b>Attention</b>	Planning Secretary
<b>Project name:</b>	Loreto Normanhurst 2022 Independent Environmental Audit
<b>Project number:</b>	SE220009.01
<b>Subject:</b>	Independent Audit Report Declaration

<b>Project Name</b>	<b>Loreto Normanhurst - 2022 Independent Environmental Audit</b>
<b>State Significant Development Consent Number</b>	8996
<b>Description of Project</b>	Stage 1 construction works at the Loreto Normanhurst School.
<b>Project Address</b>	91-93 Pennant Hills Road, Normanhurst NSW 2076
<b>Proponent</b>	Cowyn Building Group
<b>Title of Audit</b>	Independent Environmental Audit
<b>Date</b>	16 - 29 July 2022


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

- 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>	Romin Nejad
<b>Role in IEA</b>	Lead Auditor
<b>Signature</b>	
<b>Qualification</b>	Lead Auditor (Exemplar Global, No. 115361), BEng (Env), Gcert Env Mgmt, Gcert Carbon Mgmt, MBA
<b>Company</b>	Epic Environmental Pty Ltd
<b>Company Address</b>	Suite 4.01, Miller Street, Pyrmont, NSW, 2009



Project name: **Redevelopment of the Loreto Normanhurst Secondary School**

## APPENDIX C IEA PLAN





## **Independent Environmental Audit Plan**

**Cowyn Building Group**

**Redevelopment of the Loreto Normanhurst Secondary School**

**Normanhurst, NSW**

**SE220007.01**

**10 June 2022**

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## DOCUMENT CONTROL

Revision	Revision date	Revision details	Author	Editorial review	Technical review	Approver
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## DOCUMENT INFORMATION

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## 1 INTRODUCTION

Epic Environmental Pty Ltd (Epic) has been engaged by Cowyn Building Group (Cowyn) to undertake an Independent Environmental Audit (IEA) for the stage 1 construction works at the Loreto Normanhurst School (the site). This document provides a detailed IEA plan to guide the execution and reporting of the IEA. The IEA plan should be reviewed by Cowyn 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 a 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 (1/06/2022).

**Table 1. IEA Team**

Person	Role	Years' Experience	Qualification
Romin Nejad	Lead Auditor	17	Lead auditor (Exemplar Global, No. 115361), BEng (Env), GCert Env Mgmt, GCert Carbon Mgmt, MBA
Gary Bagwell	Auditing Assistant	25	BEng(Chemical), Masters (Env Law), AGSM

### 2.2 Cowyn Staff Participation Requirements

#### 2.2.1 Cowyn IEA Representative

Marc Cohen will act as the Cowyn IEA representative during the completion of this IEA. Marc 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 Cowyn personnel. Cowyn'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 Cowyn 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 Cowyn 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 Cowyn interviewees. The Cowyn 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	03/06/22	Provision of management plans required for the IEA	Email	Cowyn
17:00	10/06/22	Preparation and provision of IEA Plan to Cowyn	Email	Epic
09:00 – 17:00	13/06/22 – 15/06/22	Undertake a preliminary document review	Epic Offices	Epic
09:00 – 17:00	13/06/22	Develop the IEA tools	Epic Offices	Epic
<b>Phase II - IEA</b>				
09:30 – 10:00	16/06/22	Opening Meeting	Site	All
10:00 – 12:00	16/06/22	Site inspection	Site	Epic & Cowyn
12:00 – 16:00	16/06/22	IEA Interviews	Site	Epic & Cowyn
9:00 – 11:30	17/06/22	IEA Interviews and evidence collation	Teleconference	Epic & Cowyn
13:00 – 13:30	17/06/22	Closing Meeting	Teleconference	All
<b>Phase III – IEA Reporting</b>				
17:00	24/06/22	Provision of additional evidence not obtained during the IEA.	Email	Cowyn
09:00 – 17:00	24/06/22 – 08/07/22	Prepare the draft IEA report	Epic Offices	Epic
17:00	13/07/22	Issue the draft IEA report to Cowyn	Email	Epic
17:00	20/07/22	Cowyn provides comments on draft IEA report	Email	Cowyn
17:00	22/07/22	Issue the final IEA report to Cowyn	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 Cowyn 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 Cowyn prior to the IEA, will be reviewed to determine preliminary findings. These findings will be clarified with the Cowyn 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 Cowyn representative will be responsible for scheduling the IEA interviews with Cowyn personnel.

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

#### **3.3.4 Site Inspection**

A Cowyn 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 Cowyn and noted in the report. If an item which poses a safety risk or risk of environmental harm, the Cowyn representative will be notified immediately.

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

A closing meeting will be conducted with Cowyn at the end of the IEA. It will provide an opportunity for Epic to outline positive and negative findings identified during the IEA, Cowyn 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 Cowyn for a review and response to each finding. Each Cowyn 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 Cowyn 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 Cowyn representative.

### **4.2 General IEA Matters**

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

### **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
Marc Cohen	Cowyn, Managing Director and IEA Representative	0422 220 084	<a href="mailto:marc@cowynbuilding.com.au">marc@cowynbuilding.com.au</a>
Romin Nejad	Epic, Lead Auditor	0403 116 766	<a href="mailto:rnejad@epicenvironmental.com.au">rnejad@epicenvironmental.com.au</a>
Gary Bagwell	Epic, Auditing Assistant	0499 001 031	<a href="mailto:gbagwell@epicenvironmental.com.au">gbagwell@epicenvironmental.com.au</a>

## 5 LIMITATIONS AND DISCLAIMER

Epic Environmental Pty Ltd (Epic) has prepared the following report for the exclusive benefit of Cowyn (Client) and for the singular purpose of documenting an IEA plan for the 2021 Clyde Waste Transfer Terminal 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/>



Project name: **Redevelopment of the Loreto Normanhurst Secondary School**

## **APPENDIX D INDEPENDENT ENVIRONMENTAL AUDIT TABLE**





**CONFIDENTIAL**

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

**IEA Date:** 16 June 2022 to 29 July 2022

**Auditor:** Romin Nejad

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

**Date** 28-Feb-23

(Name)

(Sign)

### **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.

**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	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.	Compliant	1. Site Inspection (16/06/22).	During the site inspection all reasonable and feasible performance measures were observed to have been implemented to prevent material harm to the environment. This included, but not limited to: erosion and sediment controls in accordance with the soil and water management plan; street sweeping and dust management measures; and waste management measures.	
<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)	Compliant	1. Site Inspection (16/06/22). 2. IEA interviews. 3. Evidence review as part of the IEA.	During the IEA no evidence of non-compliance with the (a) to (d) was observed, although it should be noted that not every requirement within the EIS, RTs or SRTs was included within the scope of the 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.	Not Triggered	N/A	No written direction provided by the planning secretary.	
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.	Not Triggered	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.	Compliant	1. Site Inspection (16/06/22).	The construction works for sub-stage 1, sub-stage 2 and sub-stage 3 (as detailed under condition B1) were observed to have commenced during the site inspection.	
<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.	Compliant	1. 2022 school census data (email dated 11/8/22).	At the time of IEA, the school had 198 FTE staff and 1156 students. This was within the 245 staff and 1,250 students permitted for sub-stages 2 & 3.	
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.	Not Triggered	N/A	This condition applies to sub-stage 4 which had not commenced at the time of this IEA.	

**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	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.	Compliant	1. Loreto Normanhurst SSD8996 Staging Report Rev 03, dated 7 December 2021.	The Loreto Normanhurst Staging Report, includes: a) Section 1.2.1 Stage 1 Works Substages: table includes maximum permitted student and staff numbers per substage. b) Section 1.2.1 Stage 1 Works Substages: table includes maximum permitted student and staff numbers per substage. c) Not yet applicable.	
<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).	Compliant	1. Loreto Normanhurst SSD8996 Staging Report Rev 03, dated 7 December 2021. 2. Post Approval Form. 3. Approval of Plan / Strategy - Stage 1 Letter signed 10/12/2021 (DPI&E).	1. A copy of the Staging report and the submission form was received as evidence. 2. A copy of the letter received from the secretary (dated 10/12/2021) indicating that the requirements of condition A9 of SSD8669 have been satisfied and stated: '- was reviewed by the applicant - no issues raised - contains information required by conditions A10-A12 of the consent - submitted to the Department prior to commencement of construction The submission form indicates that Rev 01 of the staging report was submitted 10/11/2021, demonstrating the staging report was submitted one month prior to commencement of construction. Detail in the approval letter indicates that the report was updated based on the Department comments. Rev 3 approved.	

**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	IEA Findings	Unique Identification
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.	Compliant	1. Loreto Normanhurst SSD8996 Staging Report Rev 03, dated 7 December 2021. 2. Approval of Plan / Strategy - Stage 1 Letter signed 10/12/2021 (DPI&E).	The Staging Report Rev 03, dated 7/12/2021 was approved by DPI&E (letter dated 10/12/2021). Detail included in the Staging Report demonstrating compliance with this condition includes: a) The table included in Section 1.2.1 Stage 1 Works Substages is consistent with the detail outlined in conditioned in 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) Section 1.3 Staging Schedule Table 2: identifies the area and activity, duration and relevant substage for stage 1. e) Section 1.3 Staging Schedule Table 2: identifies the area and activity, duration and relevant substage for stage 1. Section 1.3.1 Operation Table 3 identifies 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. This section outlines separation mitigation measures including fencing and hoarding, traffic management, pedestrian protection and substage mitigation measures.	
A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	Compliant	1. Loreto Normanhurst SSD8996 Staging Report Rev 03, dated 7 December 2021. 2. Site inspection.	The site inspection confirmed the site works were conformant with the staging schedule provided in Table 2 of the staging plan.	
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.	Not triggered	N/A	This condition is a note only.	
<b>Staging, Combining and Updating Strategies, Plans or Programs</b>					

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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).	Not Triggered	N/A	This-condition provides permissions to the applicant and is not auditable.	
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.	Compliant	1. Loreto Normanhurst SSD8996 Staging Report Rev 03, dated 7 December 2021. 2. Approval of Plan / Strategy - Stage 1 Letter signed 10/12/2021 (DPI&E). 3. Planning Portal.	Evidence provided demonstrated that all the latest approved strategy, plan or program were approved and uploaded to the Planning Portal.	
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.	Not Triggered	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.	Compliant	1. Evidence supplied during the IEA for auditing of other conditions (including strategies, plans, design plans and programs)	All documentation provided during the IEA was current and up to date.	
<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.	Not Triggered	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.	Not Triggered	N/A	The condition is provided for clarification and is not an auditable matter.	
<b>Evidence of Consultation</b>					

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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	1. Correspondence with the Planning Secretary 2. Correspondence with the Hornsby Council 3. Correspondence with technical experts 4. Dilapidation Report Loreto Convent School, Normanhurst Loreto Carparks Project prepared by Opal Dilapidations Rev 00 (dated 19/11/2021, Ref: OD2214). 5. Post Approval Form. 6. Email evidence of submission of the dilapidation survey to Hornsby Council on 22/11/21.	(a) 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 IEA.  (b) The condition requires records of such consultation to be provided. Evidence of consultation required under C5(a) was observed during the IEA, however no response had been received from the consulted parties. No such evidence was available for consultation required under conditions C16(b) and C18(a).	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.	Not Triggered	N/A	This condition will be triggered once the structures are completed and will form part of the building certifications	
<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.	Not Triggered	N/A	This condition will be triggered once the structures are completed 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).	Not Triggered	N/A	This condition will be triggered once the structure are completed and will form part of the building certifications.	
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.	Compliant	1. Bushfire Protection Assessment - Loreto Normanhurst Stage 1 - works and Master Plan (EcoLogical, 5/2/2021). 2. Landscape details - Softworks, Rev E (Arcadia 2021).	No non-conformances with the landscape designs and section 3, 6 and Appendix A of the Bushfire Protection Assessment were identified during the IEA.	



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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'.	Compliant	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.	
A25	Emergency vehicle access must continue to be provided onto the sports fields from Mount Pleasant Avenue and/or Osborn Road.	Compliant	1. Site inspection.	Emergency access from Mount Pleasant / Osbourne Roads was observed during the site inspection.	
<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.	Not Triggered	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.	Not Triggered	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.	Not Triggered	N/A	The condition is provided for clarification and is not an auditable matter.	
<b>Access to Information</b>					

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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.	Compliant	<a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</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 (via a link to the NSW Planning Portal) (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 (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) details for making a complaint  The following information was not triggered at the time of the IEA: (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) 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	
<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.	Compliant	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.	
<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.	Not Triggered	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.	Not Triggered	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.	Not Triggered	N/A	No non-compliance has been identified by the applicant during the IEA period.	

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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.	Not Triggered	N/A	No non-compliance has been identified by the applicant during the IEA period.	
A35	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Not Triggered	N/A	No non-compliance has been identified by the applicant during the IEA period.	
<b>Revision of Strategies, Plans and Programs</b>					
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.	Not Triggered	N/A	No submission relevant to the condition has been submitted to date.	
A37	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. <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.	Not Triggered	N/A	No submission relevant to the condition has been submitted to date.	
<b>Compliance Reporting</b>					
A38	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).	Not Triggered	N/A	Compliance reports are triggered during operations pursuant to Compliance Reporting Post Approval Requirements (2020).	
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.	Not Triggered	N/A	Compliance reports are triggered during operations pursuant to Compliance Reporting Post Approval Requirements (2020).	
A40	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	Not Triggered	N/A	Compliance reports are triggered during operations pursuant to Compliance Reporting Post Approval Requirements (2020).	
A41	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.	Not Triggered	N/A	Compliance reports are triggered during operations pursuant to Compliance Reporting Post Approval Requirements (2020).	
<b>PART B PRIOR TO THE ISSUE OF A CONSTRUCTION CERTIFICATE</b>					

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<b>Amendments to staging of student and staff increases and transport infrastructure I 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:	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
<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.	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
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.	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
<b>Electrical Substation</b>					

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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.	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
<b>Landscape Plans</b>					
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).	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
<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.	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
<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.	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	

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<b>Stormwater Management</b>					
B8	<p>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:</p> <ul style="list-style-type: none"> <li>(a) be designed by a suitably qualified and experienced person(s);</li> <li>(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):</li> <li>(c) be in accordance with applicable Australian Standards;</li> <li>(d) include details of the on-site detention system and water sensitive urban design measures as required by the conditions of this development consent;</li> <li>(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</li> <li>(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.</li> </ul>	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
B9	<p>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:</p> <ul style="list-style-type: none"> <li>(a) be designed by a suitably qualified and experienced person(s);</li> <li>(b) have a capacity of not less than 115 cubic metres (m3), and a maximum discharge (when full) of 114 m3 per second;</li> <li>(c) have a surcharge/inspection grate located directly above the outlet;</li> <li>(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</li> <li>(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.</li> </ul>	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
B10	<p>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.</p>	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	

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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.	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
<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.	Not Triggered	N/A	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.	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
<b>Public Domain Works</b>					
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.	Not Triggered	N/A	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.	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	

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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.	Compliant	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) transition grades have a minimum length of 3m and	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
<b>Bicycle Parking and End-of-Trip Facilities</b>					



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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.	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
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.	Not Triggered	N/A	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.	Not Triggered	N/A	The construction certificate will be issued at the completion of Stage 1.	
<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.	Compliant	1. Letter from CTPG to DPI&E dated 17/12/2021. 2. Acknowledgement email from DPI&E .	1. Letter from CTPG states the intended commencement of construction of Stage 1 as 20/12/2021. 2. Email acknowledges receipt of the notification of commencement for the Loreto Normanhurst School redevelopment (concept proposal and Stage 1).	
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.	Compliant	1. Letter from CTPG to DPI&E dated 17/12/2021. 2. Acknowledgement email from DPI&E. 3. Loreto Normanhurst SSD8996 Staging Report Rev 03, dated 7 December 2021. 4. Approval of Plan / Strategy - Stage 1 Letter signed 10/12/2021 (DPI&E).	1. Letter from ctpg states the intended commencement of construction of Stage 1 as 20/12/2021. 2. Email acknowledges receipt of the notification of commencement for the Loreto Normanhurst School redevelopment (concept proposal and Stage 1). 3. Staging plan approved by DPIE (Stage 1).	
<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.	Compliant	1. Emails between CTPG, Blackett Maguire + Goldsmith (date range 10/12/2021 and 16/12/2021).	Evidence of the structural certifier being satisfied with the structural drawings was provided.	
<b>Photographic Archival Recording</b>					
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	1. Photographic Archival Recording - Stage 1 Master Plan Redevelopment Substages 1, 2 and 3, Weir Phillips Heritage and Planning, November 2021 (J5449). 2. Location Plans. 3. Large format photos. 4. Contact Sheets 5. Certifier reports	The condition requires a copy of the archival recordings be submitted to the Certifier and Council for information. Evidence of archival recordings required under the condition being supplied to the Certifier and the Department of Planning and Environment was observed during the IEA. No evidence of the archival recordings being provided to Council for information was provided during the IEA.	NC - 02

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<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.	Compliant	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.	The following evidence was supplied during the IEA: a) Example letterbox and door knock consultation report for 2A Mount Pleasant Avenue. b) Copy of the dilapidation report received includes detail on condition surveying for nominated streetscape furniture, vehicular access points, existing footpaths, courtyards, landscaped areas, building facades, carparks, sports courts and residential buildings. - Section 2 includes a table of the photographic schedule - Appendix A includes dilapidation survey maps - Appendix B includes photographic evidence c) Evidence of the report being supplied to Council. d) Evidence received of the DPI&E post approval submission form includes reference to the dilapidation report and identifies it as an attachment.	
<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.	Compliant	1. Dilapidation Report Loreto Convent School, Normanhurst Loreto Carparks Project prepared by Opal Dilapidation Rev 00 (dated 19/11/2021, Ref: OD2214). 3. Example door knock and letter box details 2A Mount Pleasant Avenue (Opal Dilapidation).	Example letterbox and door knock consultation report for 2A Mount Pleasant Avenue was provided. Opal Dilapidation undertook a door knock and a letterbox drop in Dec 2021.	
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.	Not Triggered	N/A	N/A - no evidence of a pre-construction survey being accepted was observed.	
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.	Compliant	1. Letter from TTW (dated 15 Dec 2021).	Advice from the engineers (TTW, December 2021) is that the closest properties to the site would be outside the area of influence. Therefore no dilapidation survey would be required.	
<b>Development Contributions</b>					

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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>	Compliant	<p>1. Cost summary report. 2. Hornsby Shire Council Tax receipt/invoice. 3. Section 7.12 Development Contributions Plan 2019-2029 (Hornsby Shire Council).</p>	Tax receipt provided during the IEA showed the correct amount of 1% of the costs to carry out the works as outlined on the cost summary report - \$6,026.75.	
<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.</p> <p>The Community Communication Strategy must:</p> <p>(a) identify people to be consulted during the design and construction phases; (b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; (c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; (d) set out procedures and mechanisms: (i) through which the community can discuss or provide feedback to the Applicant; (ii) through which the Applicant will respond to enquiries or feedback from the community; and (iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation. (e) include any specific requirements around traffic, noise and vibration, visual impacts, amenity, flora and fauna, soil and water, contamination, heritage.</p>	Compliant	<p>1. Letter from the Department of Planning, Industry &amp; Environment (DPIE) dated 20/12/21. 2. <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a>. 3. Community Communications Strategy (Urbis) - 2021.</p>	<p>1. A letter from the DPIE details the Community Communication Strategy (CCS) has been received by the Department and contained the information required under Condition C10. 2. The CCS was reviewed as part of the IEA and was observed to: (a) identify people to be consulted during the design and construction phases (Section 4) (b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development (Section 5.1) (c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development (Section 5.2) (d) set out procedures and mechanisms: (i) through which the community can discuss or provide feedback to the Applicant (Section 5) (ii) through which the Applicant will respond to enquiries or feedback from the community (Section 6) (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 (e) include any specific requirements around traffic, noise and vibration, visual impacts, amenity, flora and fauna, soil and water, contamination, heritage (Section 4) 3. Implementation of the CCS was observed on the applicant's website.</p>	
<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>	Compliant	<p><a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a></p>	<p>1. A community consultative committee (CCC) has been established and advertised on the Applicant's website. Quarterly meetings have been scheduled during the construction works. 2. An independent chair has been nominated for the CCC.</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.	Compliant	1. Demolition Plan, Loreto Normanhurst (Rhino Demolition). 2. Post approval form.	1. The demolition plan (prepared by a person holding a demolition license) includes 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. 2. Post approval form for the submission of the demolition plan to DPI&E 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 (OPIE 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	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)	The CEMP and required sub-plans required under the development consent were provided during the IEA. The CEMP was reviewed against the content requirements for a management plan as outlined in s4.2 and s4.3 of the Environmental Management Plan Guideline (the guideline) and it was identified the CEMP did not include the following elements required by the guideline: 1. An environmental Policy 2. Details of the approvals required for the works, including all conditions applicable to the scope of works 3. An environmental control plan or map 4. The CEMP review requirements.  The sub-plans were also reviewed against the guideline and the following was determined: 1. The CPTMP did not include responsibilities, objectives, reporting requirements, risk assessment, monitoring requirements, corrective actions and review requirements 2. the CNVMP generally addressed the requirements of the guideline 3. The CSWMP did not include a project description, objectives, responsibilities, reporting requirements, risk assessment, monitoring requirements and corrective actions 4. The CWMP generally addressed the requirements of the guideline	NC - 03
<b>Construction Environmental Management Plan</b>					

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C14	<p>Prior to the commencement of any construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary. The CEMP must include, but not be limited to, the following:</p> <p>(a) Details of:</p> <p>(i) hours of work;</p> <p>(ii) 24-hour contact details of site manager;</p> <p>(iii) management of dust and odour to protect the amenity of the neighbourhood;</p> <p>(iv) stormwater control and discharge;</p> <p>(v) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;</p> <p>(vi) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;</p> <p>(vii) community consultation and complaints handling as set out in the Community Communication Strategy required by condition C10;</p> <p>(viii) the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations;</p> <p>(b) Construction Traffic and Pedestrian Management Sub-Plan (condition C16);</p> <p>(c) Construction Noise and Vibration Management Sub-Plan (condition C17);</p> <p>(d) Construction Soil and Water Management Sub-Plan (condition C18);</p> <p>(e) Construction Waste Management Sub-Plan (condition C19);</p> <p>(f) an unexpected finds protocol for contamination and associated communications procedure;</p> <p>(g) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;</p> <p>(h) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site;</p> <p>(i) details of location of protective fencing ( exclusion fence) to protect the significant vegetation on the southern side of the site;</p> <p>(j) details to demonstrate that the proposed exclusion fence on the site would not impinge on species movement within and adjoining the site;</p> <p>(k) details of all mitigation and management measures to ameliorate impacts on flora and fauna during the construction works as indicated in the BOAR Loreto Normanhurst Biodiversity Assessment Report (version 6), prepared by Eco Logical Australia and dated 16 December 2020.</p>	Compliant	1. Construction Environmental Management Plan (CEMP).	The CEMP was reviewed as part of the IEA and addressed all matters specified in 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.	Compliant	1. Construction Certificate Requirements (Blackett Maguire + Goldsmith, 10/12/2021) 2. Post Approval Submission	The post approval submission got the CEMP and associated sub-plans was observed as part of the IEA. The construction certificate requirements letter indicates that the CEMP was received by the certifier.	

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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> <ul style="list-style-type: none"> <li>(a) be prepared by a suitably qualified and experienced person(s);</li> <li>(b) be prepared in consultation with Council and TfNSW;</li> <li>(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;</li> <li>(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;</li> <li>(e) include details of any cumulative impacts due to ongoing construction works on nearby sites;</li> <li>(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.</li> <li>(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</li> <li>(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.</li> </ul>	Non-Compliant	Construction Pedestrian and Traffic Management Plan (CPTMP)	<p>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 identified.</p> <p>Notwithstanding the above the CPTMP was reviewed as part of the IEA and addressed all matters specified in this condition.</p>	NC - 01

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C17	<p>The Construction Noise and Vibration Management Sub-Plan (CNVMP) 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>	Compliant	1. Construction Noise & Vibration Management Plan (CNVMP)	The CNVMP was reviewed as part of the IEA and addressed all matters specified in this condition.	
C18	<p>The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) 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>	Non-Compliant	1. Construction Soil and Water Management Plan (CSWMP)	<p>Sub-condition C18(a) requires for the CSWMP to be prepared in consultation with Council. During the IEA no evidence of such consultation being completed was identified.</p> <p>Notwithstanding the above the CSWMP was reviewed as part of the IEA and addressed all matters specified in this condition.</p>	NC - 01

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C19	The Construction Waste Management Sub-Plan (CWMSWP) must address, but not be limited to, the procedures for the management of waste comprising: (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; (b) information regarding the recycling and disposal locations; and (c) confirmation of the contamination status of the development areas of the site based on the validation results.	Compliant	1. Construction Waste Management Sub Plan (CWMSWP)	The CSWMP was reviewed as part of the IEA and addressed all matters specified in this condition.	
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.	Compliant	1. Construction Waste Management Sub Plan (CWMSWP). 2. Construction Pedestrian and Traffic Management plan (CPTMP).	The CPTMP includes the following: a) Section 4.17 Spoil management states that a wheel wash station will be positioned at the entry/exit point - Section 4.18 Road Serviceability includes detail for road and kerb cleaning. b) Section 4.12 impacts on public transport services; 4.13 impact on pedestrians; 4.14 impact on emergency vehicle access. c) Section 4.3 Construction hours, outlined approved hours to minimise noise: - construction deliveries: 7am-5pm (M-F), 8am-1pm Sat, no work Sunday and public holidays; - Noisy construction activities (rock breaking/hammering, sheet piling, pile driving etc): 9am - 12pm and 2pm - 5pm (M-F). d) Section 4.1 Construction vehicle route includes a reference to Figure 5 and that drivers will be advised of designated truck routes - Figure 5 identifies the approved truck routes - Section 4.6 Site induction: states approved access routes to and from the site will be included.	
<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 CSWMSWP (Schedule 3 condition C18).	Compliant	1. Site Inspection (16/06/22).	During the site inspection suitable erosions and sediment controls were observed to be implemented across the site. These were generally in accordance with the CSWMSWP.	
<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.	Compliant	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).	1. A copy of the construction worker transport strategy was observed. 2. A copy of the email receipt from DPI&E acknowledging receipt and that the Department has no comments on the document was also observed. 3. The construction certificate requirements letter indicates that the CWTS was received by the certifier and the Planning Secretary.	
<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.	Compliant	1. Biodiversity Conservation Trust Statement Confirming payment into the Biodiversity conservation Fund for an offset obligation (10/12/2021).	The trust statement includes detail of the credit obligations, number of credits and cost per credit.	



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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.	Compliant	1. Biodiversity Conservation Trust Statement Confirming payment into the Biodiversity conservation Fund for an offset obligation (10/12/2021).	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.	Non-Compliant	1. Email from DPE to CTPG acknowledging receipt of the Bio-Credit Payment (dated 1 August 2022).	The condition requires evidence of the retirement of credits to be supplied to the Planning Secretary prior to the commencement of any construction works. The date of the submission of the evidence to the Planning Secretary was August 2022. Construction works had commenced prior to the submission of the evidence.	NC - 04
<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.	Compliant	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).	1. The LCI letter to CTPG confirms lighting complies with AS1158.3.1 :2005 and AS 4282-2019. 2. The construction certificate requirements letter indicates that the letter from LCI is accepted.	
<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.	Not Triggered	N/A	At the time of the IEA construction on the buildings had not commenced.	
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 SEDA Report prepared by ARUP and dated 7 January 2019 and the requirements of condition C27 are incorporated into the detailed design of the development.	Not Triggered	N/A	At the time of the IEA, construction on the buildings where green star rating would be applicable had not commenced.	
<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.	Compliant	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).	1. Email from CTPG appointing Enviroreview as the NSW EP Accredited site auditor. 2. The construction certificate requirements letter indicates that evidence of the engagement of Enviroreview is accepted.	

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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.	Compliant	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).	The letter from 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.	
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.	Compliant	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).	1. The letter from Enviroreview includes detail of the site investigation conducted for substage area 1-3, and concludes that is was unnecessary to update the RAP as no additional contamination /remediation has been identified that hasn't already been addressed. 2. The letter from DPI&E confirms that the requirements of this condition have been met.	
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.	Compliant	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).	1. The letter from Enviroreview includes detail of the site investigation conducted for substage area 1-3, and concludes that is was unnecessary to update the RAP as no additional contamination /remediation has been identified that hasn't already been addressed. 2. The letter from DPI&E confirms that the requirements of this condition have been met.	
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.	Compliant	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).	The letter from DPI&E confirms that the requirements of this condition have been met.	
<b>Utilities</b>					
C34	Prior to the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Compliant	1.Hornsby Shire Council approval of the stormwater connection (dated 14/12/2021, ref SD/32/2021).	Stormwater design drawings for the site stamped approved by the Hornsby Shire Council were provided during the 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.	Compliant	1.Hornsby Shire Council approval of the stormwater connection (dated 14/12/2021, ref SD/32/2021).	Written approval from the Hornsby Shire Council was observed during the 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.	Not Triggered	N/A	No excavation required within the roadway.	

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<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.	Compliant	1. Site Inspection (16/06/22). 2. Excerpt from the weekly progress report 18/6/2022.	The front signage was observed and complied with the requirements of the condition.	
<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.	Compliant	1. Site Inspection (16/06/22).	All plant and equipment observed during the site inspection appeared to be tested and tagged and in good condition.	
<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.	Compliant	1. Demolition Plan, Loreto Normanhurst (Rhino Demolition). 2. Post approval form.	The demolition plan (prepared by a person holding a demolition license) includes 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.	
<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.	Compliant	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 Management Plan v.1(N.G Child & Associates, 26/11/2021).	Reference to work hours are outlined in various management plans and are consistent with the hours in this condition: '- CEMP: Section 2.3 - CPTMP: Section 4.3 - NVMP: Table 4.2	
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.	Not Triggered	N/A	No out of hours works have been undertaken to date (note the Auditor was verbally advised of this and this was unable to be confirmed from evidence).	
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.	Not Triggered	N/A	No out of hours works have been undertaken to date (note the Auditor was verbally advised of this and this was unable to be confirmed from evidence).	

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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.	Compliant	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 are outlined in: '- CPTMP: Section 4.3 - CEMP: Table 4.6: Noise (statement that work hours are in accordance with the relevant authority approval).	
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.	Not Triggered	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).	Non-Compliant	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.	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.	NC - 05 NC - 06 NC - 08
<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.	Compliant	Site inspection (16/6/2022).	1. No construction vehicles were observed to be located beyond the site boundaries during the site inspection. 2. Sufficient space was observed within the site to undertake loading and unloading activities.	
<b>Hoarding Requirements</b>					
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.	Compliant	Site inspection (16/6/2022).	No third party advertisement or graffiti was observed during the site inspection.	
<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.	Compliant	Site inspection (16/6/2022).	1. No public was outside of the approved construction zone were observed to be obstructed at the time of site inspection. 2. Construction area maps/designs observed during the IEA showed any potential obstructions occurring beyond the construction zone boundary.	
<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.	Compliant	1. Construction Noise & Vibration Management Plan v.1(N.G Child & Associates, 26/11/2021). 2. Site inspection (16/6/2022).	1. A review of the Construction Noise & Vibration Management Plan confirmed all feasible and reasonable noise mitigation measures were included in the plan. 2. No noise intensive activities were being undertaken at the time of the site inspection.	

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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.	Compliant	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 Management Plan v.1(N.G Child & Associates, 26/11/2021).	The appropriate reference to work hours including delivery of materials to and from site are outlined in: - CPTMP: Section 4.3 - CEMP: Section 2.3	
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.	Compliant	1. Construction Noise & Vibration Management Plan v.1(N.G Child & Associates, 26/11/2021).	Table 4.1 General Noise Impact Mitigation Control and Action Measures includes reference to ensure all equipment is equipped with appreciate noise control.	
<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).	Compliant	1. Construction Noise & Vibration Management Plan (CNVMP_ v.1(N.G Child & Associates, 26/11/2021).	The condition prescribes limits on potential vibration impacts on structures and human exposure. The document used to implement controls around vibration is the CNVMP. This management plan 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.  Despite the CNVMP being approved and pursuant to condition D18, the discrepancy remains and should be rectified. However this condition remains compliant as no vibration monitoring has been triggered by the scope of works.	OFI - 01
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.	Compliant	1. Construction Noise & Vibration Management Plan v.1(N.G Child & Associates, 26/11/2021).	The condition prescribes limitations on the use of vibratory compactors near residential buildings. No evidence of vibratory compactors being used within sub-stages 1A, 1B and 1C to complete the works was identified during the IEA.	
D18	The limits in Schedule 3 conditions D16 and D17 apply unless otherwise outlined in the CNVMSP required by Schedule 3 condition C17.	Not Triggered	N/A	Application of this condition has been audited under D16 & D17.	
<b>Tree Protection</b>					

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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/ies 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.	Compliant	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). 2. Site inspection (16/6/2022).	Based on the content of the Compliance Statement and the IEA site inspection, the auditor confirms: 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.	
<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.	Compliant	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	During the IEA the following was confirmed from the evidence supplied: 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>					
D21	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Compliant	1. Site inspection (16/06/22).	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.	Compliant	1. Site inspection (16/06/22). 2. Construction Environmental Management Plan v.1.0 (Cowyn Building Group). 3. Construction Pedestrian and Traffic Management Plan Rev A Ref 004RP/2021 (ttpa, December 2021).	1. Sufficient controls for dust mitigation were observed during the site inspection. 2. No mud tracking was observed at the entrance to the site. 3. The CEMP and CPTMP documented dust controls appropriate for the condition.	
<b>Erosion and Sediment Control</b>					

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D23	All erosion and sediment control measures must be effectively implemented and maintained in accordance with the CSWMSP (Schedule 3 condition C17).	Compliant	1. Site inspection (16/06/22). 2. Construction Environmental Management Plan v.1.0 (Cowyn Building Group). 3. Construction Soil and Water Management Plan (17 November 2021).	Erosion and sediment controls observed during the site inspection were generally in accordance with the Construction Soil and Water Management Plan.	
<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.	Not Triggered	N/A	No imported soil has been received on to the site for the Project.	
<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.	Not Triggered	N/A	The clause is relevant to sub-stage 4, which had not commenced at the time of the IEA.	
<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.	Compliant	1. Construction Management Plan - Figure . 2. Induction Sign on form (blank). 3. Site induction record form (blank). 4. Induction record (excerpt). 5. Emergency management plan. 6. Site inspection (16/06/22).	1. The site induction was undertaken during the IEA and included awareness training around assembly points and evacuation routes. 2. Records of training records were also observed during the IEA demonstrating personnel had been trained.	
<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.	Compliant	1. Construction Environmental Management Plan v.1.0 (Cowyn Building Group).	1. No unexpectant finds were observed by the contractor. 2. Section 5 of the CEMP includes measures to be implemented in the event of an unexpectant find.	
<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.	Compliant	1. Construction Environmental Management Plan v.1.0 (Cowyn Building Group).	1. No unexpectant finds were observed by the contractor. 2. Section 5 of the CEMP includes measures to be implemented in the event of an unexpectant find.	
<b>Waste Storage and Processing</b>					

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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.	Compliant	1. Site inspection (16/06/2022).	1. A dedicated waste storage area was observed during the site inspection. 2. The waste area was secured and maintained.	
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).	Compliant	1. Register waste spreadsheet.	The contractors waste register tracks and classifies waste types that have been collected and disposed of from the site. The waste register has classified the following waste streams: - Asbestos containing material - Virgin excavated natural material - Construction and demolition waste	
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	Compliant	1. Site inspection (16/06/2022). 2. Construction Soil and Water Management Plan (17 November 2021).	No concrete wash water was observed on the site.	
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	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.	OFI - 02
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.	Compliant	1. Construction Environmental Management Plan v.1.0 (Cowyn Building Group).	Suitable controls were observed within the CEMP 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.	Compliant	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).	1. The LCI letter to CTPG confirms lighting complies with AS1158.3.1 :2005 and AS 4282-2019. 2. The construction certificate requirements letter indicates that the letter from LCI is accepted.	
<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.	Compliant	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. Confirmation of Sydney Environmental Group being engaged to oversee the remediation.	1. The letter form Enviroreview and subsequent supervision of the remediation, confirmed remediation was undertaken in accordance with the RAP. 2. A validation report had not been prepared at the time of audit.	
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).	Not Triggered	N/A	N/A - The validation report and subsequent Interim Audit Advise had not been completed at the time of audit. This was being prepared at the time of 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.	Compliant	1. Letter - Loreto Normanhurst School Redevelopment (SSDD 8996) Appointment of Independent Audit Team (DPI&E, 1/6/2022).	Letter confirming Romin Nejad (lead auditor) and Gary Bagwell (assistant auditor) 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).	Not Triggered	N/A	No previous IEA had been completed at the time of this IEA.	



**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	IEA Findings	Unique Identification
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.	Not Triggered	N/A	No previous IEA had been completed at the time of this IEA.	
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.	Not Triggered	N/A	No previous IEA had been completed at the time of this IEA.	
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.	Not Triggered	N/A	No previous IEA had been completed at the time of this IEA.	
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.	Not Triggered	N/A	No previous IEA had been completed at the time of this IEA.	

**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 - ISO45001:2018</p> <p><b>Training package</b> <b>Training matrix</b> <b>Training record</b></p>	Compliant	<ol style="list-style-type: none"> <li>1. Construction Environmental Management Plan v.1.0 (Cowyn Building Group).</li> <li>2. Site induction record form (blank).</li> <li>3. Toolbox Meeting 17/02/2022.</li> </ol>	<ol style="list-style-type: none"> <li>1. Section 3.1 of the CEMP outlines requirements for environmental awareness and training.</li> <li>2. The induction form includes site induction details.</li> <li>3. The toolbox meeting included details for ESC.</li> </ol>	
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>	Compliant	<ol style="list-style-type: none"> <li>1. COWYN Procure.</li> </ol>	Environmental management records (including inspection sheets, waste disposal registers, waste disposal receipts, contaminated land assessments, correspondence etc.) required under the CEMP were available and observed during the IEA.	
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>	Compliant	<ol style="list-style-type: none"> <li>1. Weekly Site Safety Inspection #21 16/06/2022.</li> </ol>	The weekly inspection form includes a section for Environmental measures detailed in this section of the CEMP.	

**Loreto Normanhurst School Redevelopment**  
**Independent Environmental Audit**  
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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>	Compliant	1. Monthly report: Apr - May 2022.	Copies of monthly progress reports were observed and the following detail were document in these monthly reports: <ul style="list-style-type: none"> <li>● Correspondence</li> <li>● RFIs</li> <li>● Safety inspections (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>	

**Loreto Normanhurst School Redevelopment**  
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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>	Compliant	<ol style="list-style-type: none"> <li>1. Complaint #5 DP&amp;E Complaint record - works outside of hours.</li> <li>2. Complaints register extract.</li> <li>3. Observations register.</li> </ol>	<ol style="list-style-type: none"> <li>1. Evidence of a noise complaint record was observed during the IEA and included: date, contributing condition/behaviours, description of complaint, comments and relevant attachments.</li> <li>2. An extract of the complaints register was also observed during the audit.</li> </ol>	
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>	Compliant	<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>	Noise complaint record received included location, date, contributing condition/behaviours, description of complaint, comments and attachments.	
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>	Compliant	<ol style="list-style-type: none"> <li>1. IEA interview.</li> <li>2. Procore - Subcontractor records.</li> </ol>	During the interview copies of permits and SWMS for each sub-contractor were observed and confirmed.	

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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>	Compliant	<ol style="list-style-type: none"> <li>1. Site inspection (16/06/22).</li> <li>2. Construction Environmental Management Plan v.1.0 (Cowyn Building Group).</li> <li>3. Construction Soil and Water Management Plan (17 November 2021).</li> </ol>	<p>Erosion and sediment controls observed during the site inspection were generally in accordance with the Construction Soil and Water Management Plan. Observations included:</p> <ul style="list-style-type: none"> <li>● Installation of geofabric material over pit lids and placement of sediment control fencing</li> <li>● Limited exposed areas were observed</li> <li>● Sediment fencing around stockpiled (NB these were only minor &lt;5m3 stockpiles)</li> </ul>	
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>	Compliant	<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>	<ol style="list-style-type: none"> <li>1. SWMS provided specifically related to asbestos removal.</li> <li>2. Air monitoring records confirming monitoring has occurred.</li> <li>3. Waste disposal receipts received confirming asbestos waste has been collected by licensed waste transporters.</li> </ol>	
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>	Compliant	<ol style="list-style-type: none"> <li>1. Site inspection (16/06/22).</li> </ol>	Sufficient dust controls were observed during the site inspection.	
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>	Compliant	<ol style="list-style-type: none"> <li>1. Site inspection (16/06/22).</li> </ol>	<p>Suitable control measures to manage water quality and minimise the potential for contamination were observed during the site inspection. This included controls around stormwater grates and directing stormwater from the site across a grassed paddock prior to release.</p> <p>No potential sources of potential water contamination were observed during the site inspection.</p>	

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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>	Compliant	1. Site inspection (16/06/22).	No issues of unreasonable noise migration from the site were observed during the IEA site inspection. All plant and equipment observed on the site during the IEA appeared to have noise attenuation in accordance with the manufacturers' specifications (however this could not be independently verified without the presence of a mechanical specialist, which is beyond the reasonable scope of an IEA). The Planning Secretary had not requested any noise monitoring during the IEA period.	
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>	Compliant	<ol style="list-style-type: none"> <li>Clean fill material records.</li> <li>Waste disposal records.</li> <li>Waste disposal register.</li> </ol>	Records of fill and waste were observed during the IEA. Fill records provided evidence of VENM being received on the site. Waste records were sufficient to demonstrate compliant transport, disposal and recording of the waste material leaving the site.	
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>	Compliant	<ol style="list-style-type: none"> <li>Construction Waste Management Plan (CWMP).</li> <li>Site inspection - storage containers.</li> <li>Waste transfer certificates.</li> <li>Contaminated soil testing results.</li> <li>waste disposal register.</li> </ol>	<p>Evidence supplied during the IEA, demonstrate:</p> <ol style="list-style-type: none"> <li>Evidence of waste minimisation plan being included within the CWMP.</li> <li>Appropriate bins were supplied on the site for the storage and segregating waste.</li> <li>Contaminated soil testing was undertaken for soil removed from the site.</li> <li>Bins for the disposal of putrescible waste were provided.</li> <li>All soil was testing by appropriately qualified persons and sent to a NATA accredited lab.</li> <li>A waste disposal register was maintained and up to date.</li> </ol>	
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>	Not Triggered	N/A	No heritage works had been undertaken to date.	

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Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
4.12	<b>Hot works:</b> <ul style="list-style-type: none"> <li>Identify area of potential contamination on Site Map</li> <li>Ensure staff are trained in emergency response pro</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>	Not Triggered	N/A	No hot works to date have occurred.	
4.13	<b>Lighting:</b> <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>	Compliant	1. Site inspection (16/06/2022).	Lighting observed during the site inspection was appropriate and did not present a potential issue of light spillage to neighbouring properties.	
<b>C19</b>	<b>Construction Waste Management Sub-Plan (CWMS)</b>				
1.2	<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	1. Construction Waste Management Plan (CWMP). 2. IEA interviews.	Whilst the management and environmental representatives of Cowyn stated the document was approved and reviewed, no documented evidence that supported the approval of the document was observed.	OFI - 03
3.2	<b>Construction Certificate Requirements</b> <b>Table 3-1 Conditions of approval relevant to waste:</b> <ul style="list-style-type: none"> <li>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</li> <li>Information regarding the recycling and disposal locations</li> <li>Confirmation of the contamination status of the development areas of the site based on the validation results</li> </ul>	Compliant	1. Waste disposal register.	An up to date register of all waste materials that were collected and disposed of off-site was provided during the audit. A review of the register confirmed it was being maintained in accordance with section 3.2 of the CWMS.	
5.1	<b>Classification of waste streams</b> <ul style="list-style-type: none"> <li>Where waste cannot be avoided, reused or recycled it will be classified and appropriate disposal will then occur</li> </ul>	Compliant	1. Waste disposal register.	The waste register identified segregated waste collected and transported off-site was provided during the IEA.	
5.4	<b>Reuse and recycling</b> <ul style="list-style-type: none"> <li>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</li> <li>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</li> <li>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</li> </ul>	Compliant	1. Site inspection (16/06/2022).	Suitable receptacles for waste segregation were observed at the site. Bins were not observed to be overflowing.	

**Loreto Normanhurst School Redevelopment**  
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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>	Compliant	1. Site inspection (16/06/2022).	<ol style="list-style-type: none"> <li>1. Suitable receptacles for waste segregation were observed at the site. Bins were not observed to be overflowing.</li> <li>2. Records of the contractor engaged to undertake the collection of contaminated soil and their associated licenses were verified.</li> <li>3. No liquid waste was observed at the time of site inspection.</li> </ol>	
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>	Compliant	<ol style="list-style-type: none"> <li>1. Waste disposal register.</li> <li>2. Site inspection (16/06/22).</li> </ol>	Evidence of waste records and proposal plans being provided to the principal were observed during the IEA. All waste material was disposed of at licensed facilities.	
6	<p><b>Environment Mitigation and Management Measures:</b></p> <p>Specific measures and requirements to address waste management and energy use issues are outlined in Table 6-1.</p>	Compliant	<ol style="list-style-type: none"> <li>1. Waste disposal register.</li> <li>2. Waste disposal records.</li> <li>3. Site inspection (16/06/22).</li> </ol>	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.	
7.3	<p><b>Training</b></p> <p>All employees, contractors and utility staff working on site will undergo site induction training relating to waste management issues.</p>	Compliant	<ol style="list-style-type: none"> <li>1. Sign-on Induction Requirements.</li> <li>2. Site induction details.</li> </ol>	Site induction details include requirements for waste management on the site.	



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Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
7.4	Monitoring and inspection Weekly Environmental Inspections that includes waste management. <ul style="list-style-type: none"> <li>As required document and record the types and volumes of wastes generated, reused, recycled and disposed of - Waste records</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> <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>	Compliant	1. Inspection: SMP.2.1 - Weekly Site Safety Inspection #20. 2. Waste disposal register. 3. Waste contractor receipts.	1. 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. 2. A monthly report from the waste contractor was not observed during the IEA.	OFI - 04
8.2	<b>Waste Management Register</b> A waste management register (Appendix A) will be maintained and include the following information: <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> Waste information will include details of the date waste was reused, recycled, stockpiled or disposed, quantity and disposal location.	Non-Compliant	1. Waste disposal register.	The clause within the CWMS requires 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 is documented, the waste disposal register does not describe the ultimate fate of the material leaving the site (i.e. reused, recycled, stockpiled or disposed).	NC - 05
<b>C10</b>	<b>Community Communications Strategy</b>				
5.1	<b>Information Provision</b> 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.	Compliant	1. <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a> . 2. Community Communications Strategy (Urbis) - 2021. 3. Newsletter example / letter box drop.	1. A community consultative committee (CCC) has been established and advertised on the Applicant's website. Quarterly meetings have been scheduled during the construction works. An independent chair has been nominated for the CCC. Information on the Project and the CCC minutes are available on the website. 2. Evidence of letter box drops and door knocks were also provided during the audit.	
5.2	<b>Community Based Forums</b> 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. If required, public meetings and presentations will be held as frequently as required. Meetings would include: <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>	Compliant	1. <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a> . 2. Community Communications Strategy (Urbis) - 2021. 3. Newsletter example / letter box drop.	1. A CCC has been established and advertised on the Applicant's website. 2. Quarterly meetings have been scheduled during the construction works. An independent chair has been nominated for the CCC. Information on the Project and the CCC minutes are available on the website.	

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Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
5.3	<b>Community Consultative Committee (CCC)</b> 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.	Compliant	1. <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a> . 2. Community Communications Strategy (Urbis) - 2021. 3. Newsletter example / letter box drop.	1. A CCC has been established and advertised on the Applicant's website. Quarterly meetings have been scheduled during the construction works. An independent chair has been nominated for the CCC. Information on the Project and the CCC minutes are available on the website.	
6	<b>Enquiries and feedback response</b> 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.	Compliant	Complaint Register.	A copy of the register of complaints was observed and available during the audit.	
<b>C16</b>	<b>Construction Pedestrian and Traffic Management Plan (CPTMP)</b>				
4.2	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.	Compliant	1. Site inspection (16/06/2022).	1. No evidence of trucking into Osborn Road or Mount Pleasant Ave were observed at the time of the site inspection. 2. Sufficient space was available for trucks to enter site if required.	
4.3	Approved hours of construction and rock breaking /hammering activities	Compliant	1. IEA interview. 2. Sign-in records.	No evidence of work outside the approved hours was observed during the audit.	
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: <ul style="list-style-type: none"> <li>● 18m long (up to 3 on-street spaces) along the western side of Osborn Road</li> <li>● 25m long (up to 4 on-street spaces) along the western side of Mount Pleasant Avenue</li> <li>● 35m long (up to 6 on-street spaces) along the western side of Mount Pleasant Avenue</li> </ul>	Compliant	1. Photos of slab being poured. 2. Site inspection.	1. Sufficient space was observed on site to accommodate loading and unloading. 2. Unloading of waste trucks was observed during the site inspection. 3. Removal of some on street parking on Mount Pleasant Avenue was observed at the time of site inspection. 4. Photos provided by Cowyn during the IEA also demonstrated concrete pumps were positioned within the site boundary at the time of slab pouring.	
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.	Compliant	1. Induction records. 2. Completed induction. 3. SWMS.	1. Records of the induction were observed during the audit. 2. Site specific SWMS were also observed for each trade and included the specific OHS requirements.	
4.7	It is anticipated that there will be the following average and maximum number of workers (employees and contractors) during the construction period: <ul style="list-style-type: none"> <li>● Substage 1: 15 (average); 30 (maximum)</li> <li>● Substage 2: 20 (average); 40 (maximum)</li> <li>● Substage 3: 25 (average); 50 (maximum)</li> </ul>	Compliant	1. Sign-on records/sheets. 2. Site inspection.	Based on a select review of sign-on records no exceedance of 30 workers was observed on any day (note the CTMP states maximum workers would be 30 during sub-stage 1, 40 during sub-stage 2 and 50 during sub-stage 3). The number of workers on the day of the site inspection was 17.	
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.	Compliant	1. Site inspection. 2. Induction.	1. During the site inspection all worker vehicles were observed to be parked within the construction area and some on Mount Pleasant Avenue. 2. No staff/student parking was utilised by workers. This requirement was also reflected in the induction.	
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.	Compliant	1. Site inspection. 2. Induction.	Secure fenced facilities for tools and machinery was available on the site at the time of inspection.	

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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.	Compliant	1. Site Inspection. 2. Interviews.	Whilst Cowyn was aware of this requirement, there was no requirement for RMS traffic controllers / trained personnel at the time of inspection.	
4.11	Temporary site security and dust fencing will be installed along the site boundary.	Compliant	1. Site inspection.	Temporary security fencing was observed along the site boundary (NB: this was not required where permanent school fencing was already provided).	
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	Compliant	1. <a href="https://www.loretonh.nsw.edu.au/pages/master-plan">https://www.loretonh.nsw.edu.au/pages/master-plan</a> . 2. Community Communications Strategy (Urbis) - 2021. 3. Newsletter example / letter box drop.	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.	Compliant	1. Site inspection. 2. Construction design plans.	No impact to neighbouring property access was required during the scope of works.	
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.	Non-Compliant	1. Site inspection.	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.	NC - 06
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.	Compliant	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.	Compliant	1. Site Inspection.	The site layout was generally in accordance with the figure in Appendix A of the CSWMP.	
6	<b>Erosion and Sediment Control:</b> <ul style="list-style-type: none"> <li>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</li> <li>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</li> </ul>	Compliant	1. Site Inspection. 2. Weekly inspections.	Erosion and sediment controls observed during the site inspection were generally in accordance with the Construction Soil and Water Management Plan. Erosion and sediment controls are part of the completed site manager weekly inspections.	
<b>C17</b>	<b>Construction Noise and Vibration Management Plan (CNVMP)</b>				
4.4	<b>NOISE MITIGATION ACTIONS</b> <b>Table 4-1 General Noise Impact Mitigation Control &amp; Action Measures</b> <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, <u>deploy screens in a way to ensure noise goals are met</u></li> </ul>	Compliant	1. Complaint register. 2. Site induction. 3. Site inspection. 4. IEA interviews.	1. 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 complaint register was also observed during the IEA. 2. Environmental matters (including noise management) were addressed as part of the site induction. 3. Cowyn were aware of requirement for temporary screens, however, no excessively noisy activities were required at the time of IEA to warrant the deployment of screens. 4. The induction of the site personnel included awareness on noise impacts 5. Equipment observed during the IEA included a telehandler, generator and light vehicles. These plant were all appropriately fitted with noise controls (e.g. mufflers, acoustic enclosures, reversing beepers etc.)	
5.4.1	<b>Noise Monitoring Locations</b> Two locations have been selected for noise monitoring, consistent with the potentially sensitive boundary locations (Fig 5.1): A. The western site boundary of the development site adjacent to Osborn Road; and B. The eastern site boundary adjacent to Mount Pleasant Avenue	Not Triggered	N/A	No noise monitoring has been triggered to date.	

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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  Any identified noise level exceedances will be investigated to determine the cause, and to identify any necessary mitigation measures</p>	Not Triggered	N/A	No noise monitoring has been triggered to date.	
5.4.3	<p><b>Instrumentation</b>  The following procedures should be observed during noise measurement operations:</p> <ul style="list-style-type: none"> <li>● Ensure that the Sound Level Meter (SLM) used for monitoring has current laboratory calibration certification</li> <li>● Operate the SLM strictly in accordance with relevant guidelines</li> <li>● Ensure the windscreen is attached and that the SLM is set to A-weighted and fast response</li> <li>● Prior to and completing each sound level measurement, the SLM should be field calibrated using the calibrator supplied with the instrument</li> <li>● Ensure that the pre- and post- measurement calibrations do not differ by more than 0.5dB(A)</li> </ul> <p><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.</p>	Not Triggered	N/A	No noise monitoring has been triggered to date.	
7.4.2	<p><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.</p>	Compliant	<ol style="list-style-type: none"> <li>1. Letter box drop.</li> <li>2. Community Consultative Committee.</li> </ol>	Evidence of a letter box drop provided to surrounding neighbours was observed during the IEA.	

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Reference	Commitment (Exact Wording)	Assessment	Evidence Reviewed	IEA Findings	Unique Identification
7.4.3	<p><b>Complaints Management</b>  The following procedure will be followed in the case of any complaints received, either verbally or in writing:</p> <ol style="list-style-type: none"> <li>1. All complaints received in relation to noise or other issues, including vibration and dust issues, will be recorded in an appropriate log.</li> <li>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.</li> <li>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.</li> <li>4. A written response will be provided to all complainants, advising the outcome of the investigation of the complaint, and any relevant actions taken.</li> </ol>	Compliant	<ol style="list-style-type: none"> <li>1. Complaint register.</li> <li>2. Site induction.</li> <li>3. Site inspection.</li> <li>4. IEA interviews.</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 (including correspondence). The complaint related to works commencing prior to the authorised start time, however on investigation it no early commencement was noted. However the contractor was advised of the complaint and requested a toolbox communication be released detailing allowable construction start times. The contractor was also required to provide weekly report confirming the start times of each work day.</p> <p>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.</p>	
11.3.1	<p><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.</p>	Non-Compliant	No evidence provided.	The section of the plan requires an environmental management review with Cowyn and the acoustic consultant (or adviser) be undertaken every 6 months. No evidence of an environmental management review being undertaken within 6 months of the project commencing was observed.	NC - 07
11.3.2	<p><b>Continuous Improvement</b>  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>	Non-Compliant	No evidence provided.	The section of the plan requires an review and continual improvement of the plan every 6 months and a review of noise monitoring every 3 months. Whilst no noise monitoring has been undertaken to date, no evidence of a review or update of the plan was observed in the 6 months since the plan was completed.	NC - 07

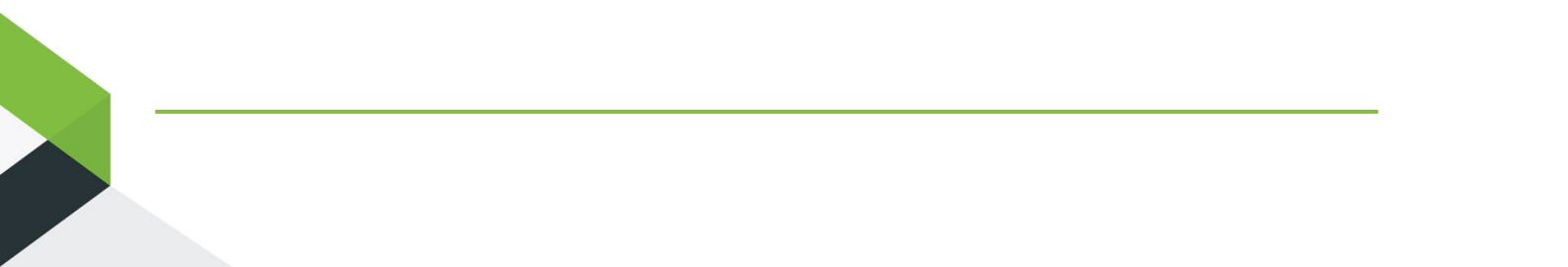
**APPENDIX E SITE INSPECTION PHOTOS**



**Plate 1.** Sediment trap around the stormwater inlet in carpark



**Plate 2.** Sediment fencing and check dams on driveway edge





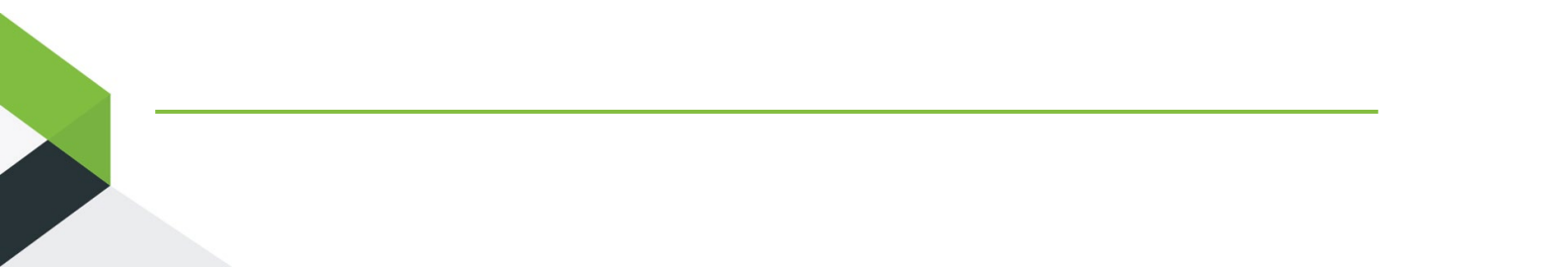
**Plate 3.** Established surface water point from active work area across vegetated areas



**Plate 4.** View from Mount Pleasant Avenue towards the site entrance



**Plate 5.** Dedicated and secured waste storage area





Project name: **Redevelopment of the Loreto Normanhurst Secondary School**

## **APPENDIX F IEA ACTION PLAN**





**Loreto Normanhurst School Redevelopment  
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Recommendation Identification	Relevant Condition / Section	Requirement (Exact Wording)	Corresponding Finding	IEA Findings	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)	Action Status (on Oct 2022)
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	(a) 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 IEA.  (b) The condition requires records of such consultation to be provided. Evidence of consultation required under C5(a) was observed during the IEA, however no response had been received from the consulted parties. No such evidence was available for consultation required under conditions C16(b) and C18(a).	Sub-stage 1 - 3 have been completed.  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.	Mar-23	Open
	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) requires for the CPTMP to be prepared in consultation with Council and TfNSW. During the IEA no evidence of such consultation being completed was identified.  Notwithstanding the above the CPTMP was reviewed as part of the IEA and addressed all matters specified in this condition.			
	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) requires for the CSWMP to be prepared in consultation with Council. During the IEA no evidence of such consultation being completed was identified.  Notwithstanding the above the CSWMP was reviewed as part of the IEA and addressed all matters specified in this condition.			
NC - 02	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 condition requires a copy of the archival recordings be submitted to the Certifier and Council for information. Evidence of archival recordings required under the condition being supplied to the Certifier and the Department of Planning and Environment was observed during the IEA. No evidence of the archival recordings being provided to Council for information was provided during the IEA.	Sub-stage 1 - 3 have been completed.  Prior to sub-stages 4 - 6 the archival recordings will be provided to Council for information as required by Condition C4.	Mar-23	Open
NC - 03	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: • 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	Non-Compliant	The CEMP and required sub-plans required under the development consent were provided during the IEA. The CEMP was reviewed against the content requirements for a management plan as outlined in s4.2 and s4.3 of the Environmental Management Plan Guideline (the guideline) and it was identified the CEMP did not include the following elements required by the guideline: 1. An environmental Policy 2. Details of the approvals required for the works, including all conditions applicable to the scope of works 3. An environmental control plan or map 4. The CEMP review requirements.  The sub-plans were also reviewed against the guideline and the following was determined: 1. The CPTMP did not include responsibilities, objectives, reporting requirements, risk assessment, monitoring requirements, corrective actions and review requirements 2. the CNVMP generally addressed the requirements of the guideline 3. The CSWMP did not include a project description, objectives, responsibilities, reporting requirements, risk assessment, monitoring requirements and corrective actions 4. The CWMP generally addressed the requirements of the guideline	Sub-stage 1 - 3 have been completed.  Prior to the commencement of sub-stages 4 - 6, update the CEMP, CPTMP and CSWMP to address the requirements of the Environmental Management Plan Guideline: Guideline for Infrastructure Projects.	Mar-23	Open

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Recommendation Identification	Relevant Condition / Section	Requirement (Exact Wording)	Corresponding Finding	IEA Findings	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)	Action Status (on Oct 2022)
NC - 04	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.	Non-Compliant	The condition requires evidence of the retirement of credits to be supplied to the Planning Secretary prior to the commencement of any construction works. The date of the submission of the evidence to the Planning Secretary was August 2022. Construction works had commenced prior to the submission of the evidence.	As the non-compliance is related to an event in the past there is no action that could be applied that would address the matter retrospectively. Therefore the applicant will notify the Planning Secretary of the non-compliance via submission of the IEA report.	Closed	Closed
NC - 05 & OFI - 05	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.	Sub-stage 1 - 3 have been completed.  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.	Dec-22	Open
	CWMSP 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.		The clause within the CWMSP requires 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 is documented, the waste disposal register does not describe the ultimate fate of the material leaving the site (i.e. reused, recycled, stockpiled or disposed).			
	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.			
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	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.	Sub-stage 1 - 3 have been completed.  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	Dec-22	Open
	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.		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.			

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

Recommendation Identification	Relevant Condition / Section	Requirement (Exact Wording)	Corresponding Finding	IEA Findings	Proponent's Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)	Action Status (on Oct 2022)
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	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.	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.	Dec-22	Open
	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.		The section of the plan requires an environmental management review with Cowyn and the acoustic consultant (or adviser) be undertaken every 6 months. No evidence of an environmental management review being undertaken within 6 months of the project commencing was observed.			
	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		The section of the plan requires an review and continual improvement of the plan every 6 months and a review of noise monitoring every 3 months. Whilst no noise monitoring has been undertaken to date, no evidence of a review or update of the plan was observed in the 6 months since the plan was completed.			
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	The condition prescribes limits on potential vibration impacts on structures and human exposure. The document used to implement controls around vibration is the CNVMP. This management plan 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.  Despite the CNVMP being approved and pursuant to condition D18, the discrepancy remains and should be rectified. However this condition remains compliant as no vibration monitoring has been triggered by the scope of works.	Sub-stage 1 - 3 have been completed.  Prior to the commencement of sub-stages 4 - 6, 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)	Mar-23	Open
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	Whilst the management and environmental representatives of Cowyn stated the document was approved and reviewed, no documented evidence that supported the approval of the document was observed.	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.	Closed	Closed
OFI - 04	CWMSP s7.4	<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	Compliant	1. Monitoring and inspection records observed during the IEA included those listed in the CWMSP. Waste contractor records comprised of receipts of material removed from the site. 2. A monthly report from the waste contractor was not observed during the IEA.	Sub-stage 1 - 3 have been completed.  During sub-stages 4 - 6, request the waste contractor provide a monthly report. The monthly report should include 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)	Dec-22	Open



Project name: **Redevelopment of the Loreto Normanhurst Secondary School**

## **APPENDIX G CONSULTATION WITH COUNCIL (CONDITION C5(A))**



**From:** [Luke Gladwish](#)  
**To:** [hsc@hornsby.nsw.gov.au](mailto:hsc@hornsby.nsw.gov.au)  
**Subject:** SSD-8996 Loreto Normanhurst - Submission of Dilapidation Survey  
**Date:** Monday, 22 August 2022 2:54:00 PM  
**Attachments:** [image002.png](#)

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Good afternoon,

In accordance with Schedule 3, Condition C5(c) of the conditions of consent related to SSD-8996 Loreto Normanhurst, please see below link to Pre-Construction Dilapidation Report, dated 19 November 2021.

 [OD2214 - Loreto Convent School, Normanhurst - Dilapidation Report - Rev 00.pdf](#)

Kind Regards,

**Luke Gladwish**  
Director



Carmichael Tompkins Property Group  
T&G Building, Level 2, 161 Collins Street, Melbourne VIC 3000  
T: +61 3 7037 6001 | M: 0421 904 833  
E: [luke.gladwish@ctpg.com.au](mailto:luke.gladwish@ctpg.com.au)  
EA: [elaine.anderson@ctpg.com.au](mailto:elaine.anderson@ctpg.com.au)  
[www.ctpg.com.au](http://www.ctpg.com.au)  
Sydney | Melbourne

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The Epic team provides a wide range of skills and experience on numerous environmental management issues, across a wide range of public, commercial and industrial projects. At Epic, we focus on the practical aspects of environmental planning, engineering, and science, offering comprehensive services in:

- Strategic advice and project support;
- Contaminated site assessment, management and remediation;
- Asbestos assessment and advisory;
- Naturally Occurring Radiological Material assessment and management;
- Contaminated land auditing services (QLD –Contaminated Land Auditor; NSW – Contaminated Site Auditor);
- Statutory planning and impact assessment covering QLD, NSW and Commonwealth legislation;
- Environmental approvals and permitting – full array;
- Ecological (fauna, flora and habitat) site assessments;
- Site suitability assessments;
- Environmental offset assessments and development of management strategies;
- Waste auditing and management;
- Landfill design and management;
- Compliance and auditing;
- Erosion sediment control; and
- Hydrogeology.

## 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/>