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Newcastle Grammar School Park Campus

Independent Environmental Audit #3



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Description **Independent Environmental Audit of the Newcastle Grammar School Park Campus approved under SSD-13895306 and located at 127 Union Street, Cooks Hill, New South Wales.**

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V1.0	04/12/2024	CL	ST	VS	Working Draft 1 issued as Audit Table (Appendix 1) only for additional document request and factual review.
V2.0	09/01/2025	CL	ST	VS	Draft 2 issued as entire IEA report to for factual review.
V3.0	20/01/2025	CL	ST	VS	Final issued.

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Executive Summary

Ramboll Australia Pty Ltd has been engaged by Newcastle Grammar School (NGS) to conduct an Independent Environmental Audit of the NGS Park Campus development located at 127 Union Street, Cooks Hill, New South Wales.

The project includes the redevelopment of the site, including alterations and additions to the existing and operating Newcastle Grammar Park Campus school. The project received State Significant Development approval subject to conditions, (development consent SSD-13895306), issued by the Minister for Planning in January 2023 under section 4.38 of the *Environmental Planning and Assessment Act 1979* for the first stage of development (Stage 1) and concept proposal (Stage 2 and Stage 3) for alterations and additions and the redevelopment of the site.

This IEA is the third IEA conducted for the Project. The audit period is from 8 May 2024 to 7 November 2024. A one-day site visit was undertaken by the Audit Team on 30 October 2024, accompanied by NGS representatives.

The development is considered to be generally compliant with the conditions of approval in SSD-13895306. One non-compliance finding has been made in this audit in relation SSD-13895306 with regards to the adequacy of the Environmental Management Plan in place, however, it is noted that environmental performance was of a high-standard and no complaints or incidents have been recorded for the Audit Period. One opportunity for improvement was identified where the environmental management plan could be further improved.

Acronyms and Abbreviations

Term	Definition
APP	APP Corporation Pty Ltd
CPG	Core Project Group Pty Ltd
DPHI	Department of Planning, Housing and Infrastructure
DPHI	The Department of Planning, Housing and Infrastructure
EMP	Environmental Management Plan by Core Project Group Pty Ltd and APP Group Pty Ltd dated 05/06/2024.
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
IAPAR 2020	<i>Independent Audit Post Approval Requirements</i> by the Department of Planning, Industry and Environment (now the Department of Planning, Housing and Infrastructure) dated 2020.
IEA	Independent Environmental Audit
IEA#1	<i>Newcastle Grammar School Park Campus – SSD13895306 Independent Environmental Audit #1 – Amended for RFI 68492218_2</i> (EMM Consulting Pty Ltd, 2024) for the Audit Period 14 September 2023 to 17 November 2023.
IEA#2	<i>Newcastle Grammar School Park Campus – SSD13895306 Independent Environmental Audit #2</i> (EMM Consulting Pty Ltd, 2024) for the Audit Period 18 November 2024 to 7 May 2024
LGA	Local Government Area
NC	Non-compliance
NC	Non-compliant
NGS	Newcastle Grammar School
Ramboll	Ramboll Australia Pty Ltd
RFI	Request for Information
RFI	Request for Information
SSD	State Significant Development
SSD	State Significant Development
The Department	The Department of Planning, Housing and Infrastructure
The Project	The redevelopment of the Site including alterations and additions to the existing and operating Newcastle Grammar Park Campus school under SSD-13895306.
The Site	127 Union Street, Cooks Hill NSW 2300 (Lot 102 DP861562)
TPZ	Tree Protection Zone

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Auditor Declaration of Independence

1. Introduction

Ramboll Australia Pty Ltd (Ramboll) has been engaged by Newcastle Grammar School (NGS) to conduct an Independent Environmental Audit (IEA) of the NGS Park Campus development located at 127 Union Street, Cooks Hill, New South Wales (NSW) (the Site).

The development involves the redevelopment of the Site including alterations and additions to the existing and operating Newcastle Grammar Park Campus school (the Project). The development was approved by the Minister for Planning on 9 January 2023 under section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) subject to conditions (development consent SSD-13895306).

1.1 Background

The Site is in the suburb of Cooks Hill within the Newcastle City Council Local Government Area (LGA). The Site is zoned as R3 'Medium Density Residential' under the *Newcastle Local Environmental Plan 2012*. The Site is bound by Union Street to the northwest; Parkway Avenue to the southwest; Corlette Street to the southeast; and residential unit blocks to the northeast. The Site locality shown as **Figure 1-1**.



Figure 1-1: NGS Park Campus Site Locality

Image Source (SHAC, 2021)

The NGS Park Campus currently operates as a Kindergarten to Year 4 (K-4) independent primary school. In 2021, NGS sought State Significant Development (SSD) approval for the redevelopment of the Site including alterations and additions. The Project represents an opportunity to support Year 5 and Year 6 at the Site while also alleviating pressure on the existing school facilities, thereby providing the school with capacity to accept additional enrolments. The Project aims to deliver future focused learning spaces in accordance with the Educational Facilities Standards and Guidelines.

The Project received SSD approval subject to conditions, (development consent SSD-13895306), issued by the Minister for Planning in January 2023 under section 4.38 of the EP&A Act for the first stage of development (Stage 1) and concept proposal (Stage 2 and Stage 3) for alterations and additions and the redevelopment of the Site. The Stage 1 Site plan is shown as **Figure 1-2**.

It is understood that the Project is already underway and is being completed within the defined stages. The works associated with 'Stage 1' and 'Stage 2 and 3' (the concept development proposal) are outlined as follows.

Stage 1 of the Project includes:

- An increase in student numbers from 256 to 480
- Demolition of a covered outdoor learning area as well as blocks C, D and F
- Construction of a three-storey building with a rooftop play area facing Union Street
- Refurbishment of building B for use as administration, staff and offices
- Construction of a one-way road adjacent to the northern boundary to provide a kiss and drop area
- Stormwater and service upgrades
- Site landscaping.

Stage 2 and Stage 3 of the Project include:

- An overall increase in student numbers to 640
- Construction of a two-storeys plus basement building adjacent to Corlette Street providing parking for 31 to 35 cars
- Alterations and additions to 'Building A' to include the refurbishment of the Sandi Warren performance centre, a new canteen, library and specialist learning facilities
- Site landscaping.

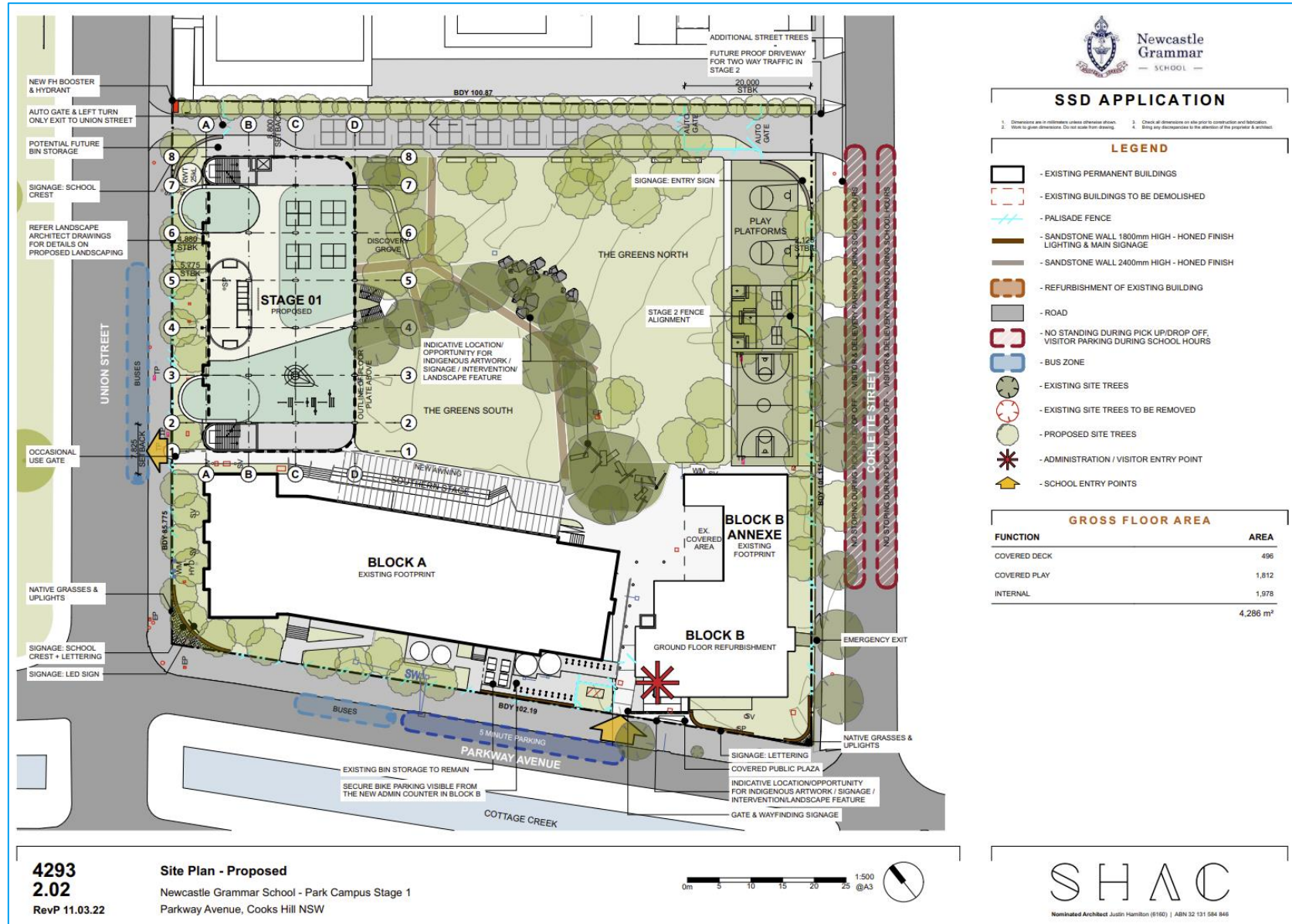


Figure 1-2: SSD-13895306 Project Stage 1 Site Plan

Image Source (SHAC, 2022)

1.2 Audit Team

The Audit Team comprised Victoria Sedwick (Lead Auditor), Shaun Taylor (Auditor) and Charyssa Lawrence (Auditor Assistant) of Ramboll. The Audit Report was prepared by the Auditor Assistant, checked by the Auditor and authorised by the Lead Auditor.

1.3 Audit Objectives

The objective of the audit was to independently assess the environmental performance and compliance status of the Project under SSD-13895306.

1.4 Audit Scope

The scope of the audit is in accordance with SSD-13895306, Conditions F37 to F42 as follows:

"Independent Environmental Audit

- F37. *Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).*
- F38. *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.*
- F39. *The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (2020), upon giving at least 4 week's notice (or timing) to the applicant of the date or timing upon which the audit must be commenced.*
- F40. *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 condition F37 of this consent;*
 - (b) submit the response to the Planning Secretary and the Certifier; and*
 - (c) make each Independent Audit Report and response to it publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.*
- F41. *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.*
- F42. *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."*

For the purposes of this Audit, Newcastle Grammar School (NGS) is the Applicant, APP Group Pty Ltd (APP) is the Project superintendent and Core Project Group Pty Ltd (CPG) is the construction contractor.

1.5 Audit Period

The previous Independent Environmental Audits (IEA) completed for the NGS Park Campus Project have included *Newcastle Grammar School Park Campus – SSD13895306 Independent Environmental Audit #1 – Amended for RFI 68492218_2* (EMM Consulting Pty Ltd, 2024) for the Audit Period 14 September 2023 to 17 November 2023 ('IEA#1') and *Newcastle Grammar School Park Campus – SSD13895306 Independent Environmental Audit #2* (EMM Consulting Pty Ltd, 2024) for the Audit Period 18 November 2024 to 7 May 2024 ('IEA#2'). This IEA is the third IEA conducted for the Project and the audit period covered includes the period from the 8 May 2024 to 7 November 2024.

2. Audit Methodology

The Audit was conducted in accordance with Australian Standard *AS/NZS ISO 19011:2014: Guidelines for quality and/or environmental management systems auditing* and the *Independent Audit Post Approval Requirements* (Department of Planning, Industry and Environment (now Department of Planning, Housing and Infrastructure), 2020) (the IAPAR 2020).

2.1 Selection and Endorsement of Audit Team

The Ramboll Auditors referred to in **Section 1.2** have extensive experience in conducting environmental compliance audits and are independent from both NGS, APP Group and CPG. Victoria Sedwick (Lead Auditor) is a certified Lead Auditor with Exemplar Global (Certificate No. 13180). As required under Condition F38 of SSD-13895306, endorsement of the Audit Team by the Department of Planning, Housing and Infrastructure (DPHI) was provided in a letter dated 10 October 2024 (refer to **Appendix 2**).

2.2 Independent Audit Scope Development

The scope for this Audit was developed to assess the development's environmental performance in relation to the Project's Stage 1 construction conditions of SSD-13895306, which included all post approval documents prepared to satisfy the conditions relevant to the construction phase associated with Stage 1 of development.

In addition to the above considerations, the scope of the Audit was further developed based on review or undertaking of the following:

- The recommendations made in previous IEAs (IEA#1 and IEA#2)
- The requirements made in IAPAR 2020
- Audit table development (refer to **Section 2.2.1**)
- Agency consultation (refer to **Section 2.2.2**)
- Request for information (refer to **Section 2.2.3**)
- Document review (refer to **Section 2.2.4**)
- Site inspections, observations and interviews (refer to **Section 2.2.5**)
- Compliance evaluation (refer to **Section 2.2.6**).

2.2.1 Audit Table Development

A comprehensive protocol (Audit Table) was developed for the development consent to facilitate onsite interviews, observations and inspections for the assessment of compliance in accordance with the IAPAR 2020. The Audit Table includes:

- a unique identification number for each condition of consent (ID)
- the exact wording of the compliance requirement
- evidence used to assess and determine whether each requirement has been complied with
- commentary on findings and recommendations
- recording the status of compliance
- a unique identification number for each non-compliance (NC)

The completed Audit Table is provided in **Appendix 1**.

2.2.2 Agency Consultation

The Auditors consulted with the DPHI and Newcastle City Council in accordance with IAPAR 2020 requirements. Outcomes of consultation undertaking during the audit are included in **Section 3.6**.

2.2.3 Request for Information

A formal request for information (RFI) was developed by Ramboll and issued to APP Group and CPG personnel on the 21 October 2024. The RFI represented the preliminary information request for items to facilitate the document review task such as: management plans; environmental reports; environmental monitoring data; incident and complaint forms; evidence of report or plan submission; stakeholder consultation undertaken in the audit period; and, any other documents or correspondence deemed relevant to the requirements of SSD-13895306.

A working draft of the Audit Table (**Appendix 1**) was issued to APP Group and CPG personnel on 4 December 2024 in order to facilitate an initial factual review, and a second RFI. The second RFI addressed any additional documents requested by the Auditors where there was insufficient evidence from the response to the initial RFI to assess the compliance of the Project.

During this initial factual review of the Audit Table, the applicant provided additional information in response to 'NC1' which related to the Environmental Management Plan (EMP) prepared for construction of the Project which was identified as not being in accordance with the *Environmental Management Plan Guideline: Guideline for Infrastructure Projects* (DPIE (now 'DPHI') April 2020) (Refer to **Section 3.6.1** for further information regarding NC1). The Auditors did not view the additional information provided by the applicant to be sufficient to prompt an update to NC1 findings.

2.2.4 Document Review

The document review task is an evidence-gathering process that involves careful examination of NGS's organisational documents and supporting records to confirm accuracy and agreement with NGS's consent. The evaluation of any documents reviewed was undertaken in accordance with the IAPAR 2020 requirements which states that:

- "the adequacy of documents must be determined on the basis of whether:*
- 1. there are any non-compliances resulting from the implementation of the document; and*
 - 2. whether there are any opportunities for improvement."*

Consideration of the adequacy of available documentation is provided in **Section 3.7**.

2.2.5 Site Inspections, Observations and Interviews

A one-day site visit was undertaken by the Audit Team comprising Victoria Sedwick (Lead Auditor), Shaun Taylor (Auditor) and Charyssa Lawrence (Auditor Assistant) on 30 October 2024. The Lead Auditor, Auditor and Auditor Assistant were accompanied by NGS representatives including:

- Jennifer Passfield, Senior Project Manager, APP Group
- Luiza De Souza, Project Manager, APP Group
- Andrew Brinkworth, Project Manager, CPG
- Joshua Smith, Site Engineer, CPG

During the site visit, the Auditors conducted an opening meeting, followed by a meeting to interview the NGS representatives and clarify any issues identified during the document review task. The site inspection also included a site inspection with NGS representatives to facilitate any inspections or observations as directed by the Auditors. Photos taken during the site inspection are provided in **Appendix 3**.

2.2.6 Compliance Review

All information gathered throughout the Audit process was reviewed, evaluated and collated into this Audit Report to assess compliance with SSD-13895306.

This Audit Report has been prepared in accordance with IAPAR 2020 including adoption of compliance status descriptors outlined in the IAPAR 2020 and reproduced in the following **Table 2-1**. These compliance status descriptors have been used to assess compliance requirements in the Audit table presented as **Appendix 1**.

Table 2-1: Compliance status descriptors

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

Observations have also been made that identify opportunities for improvement with recommendations given where relevant (refer to **Section 4.1**).

2.3 Closing Meeting

A closing meeting was held online on 17 January 2025 to allow for clarification of some issues, discussion of preliminary audit findings and recommendations for post-audit actions in relation to factual accuracy. The closing meeting was attended by the Auditor and Auditor Assistant (refer to **Section 1.2**) as well as NGS representatives, Jennifer Passfield, (Senior Project Manager, APP Group) and Luiza De Souza, (Project Manager, APP Group). The clarifications and findings had been discussed prior to the meeting and after the meeting with the Lead Auditor who was unable to attend the Closing meeting.

3. Audit Findings

3.1 Document List

Documents provided by APP, CPG and/or publicly available on the applicant’s website, as well as the Department’s Major Projects website, that were reviewed by the Auditors are summarised in **Table 3-1**.

Table 3-1: Key document list

Document type	Key documents
Previous Audits	<ul style="list-style-type: none"> • Newcastle Grammar School Park Campus – SSD13895306 Independent Environmental Audit #1 – Amended for RFI 68492218_2 by EMM Consulting Pty Ltd dated June 2024 (IEA #1) • Newcastle Grammar School Park Campus – SSD13895306 Independent Environmental Audit #2 by EMM Consulting Pty Ltd dated July 2024 (IEA #2)
Approvals	<ul style="list-style-type: none"> • Development Consent SSD-13895306
Architectural plans	<ul style="list-style-type: none"> • Architectural Masterplan Set 4293 MP1.01-MP1.09 by SHAC dated 07/10/21 • Landscape Plan Set by Gallagher Studio dated 08/03/2022
Management Plans	<ul style="list-style-type: none"> • Environmental Management Plan by Core Project Group and APP Group and dated 05/06/2024 which includes the following subplans: <ul style="list-style-type: none"> ○ Community Communication strategy by Core Project Group and APP Group dated 25/08/2023 ○ Stormwater Management Strategy by Lindsay Dynan dated 30/03/2022 ○ Construction Soil and Water Management Plan by Northrop dated 05/12/2023 ○ Waste Management Plan by SLR Consulting Pty Ltd dated October 2021 ○ Hazardous Substances Management Plan by Practical Environmental Solutions Pty Ltd dated 28/05/2021 ○ Construction Traffic Management Plan by Gateshead Traffic Solutions Pty Ltd dated 08/09/2023 ○ Acid Sulfate Soil Management Plan by Tetra Tech Coffey Pty Ltd dated ○ Aboriginal Cultural Heritage Management Sub-Plan by Heritage Now Pty Ltd dated 01/11/2023 ○ Newcastle Grammar School Construction Noise and Vibration Management Plan by RCA Australia Pty Ltd dated 12/02/2024 ○ Construction Flood Emergency Plan by Core Project Group dated 05/06/2024
Reports	<ul style="list-style-type: none"> • Arborist Report by Abacus Tree Services dated 21/06/21 • Construction Stage Inspection Report (Arborist) by Abacus Tree Services dated 23/08/24 • Remediation Action Plan by Tetra Tech Coffey, dated 13 October 2021
Other	<ul style="list-style-type: none"> • Letter correspondence Subject: <i>Warning Letter – Breach of Section 4.21(1) of the Environmental Planning and Assessment Act 1979</i> by DPPI dated 30/08/2024

Document type	Key documents
	<ul style="list-style-type: none"> • Letter correspondence Subject: <i>Response to Warning Letter Commencement of construction (SSD-13895306)</i> by CPG dated 02/09/2024 • Letter correspondence Subject: <i>Warning Letter – Breach of Section 4.21(1) of the Environmental Planning and Assessment Act 1979</i> by DPHI dated 24/09/2024 • Letter correspondence Subject: <i>Tree Protection Zone (SSD-13896306 – INV)6140709</i> by CPG dated 26/08/2024 • NSW Government Major Projects Portal for SSD-13895306 • Newcastle Grammar School Park Campus website • Complaints register • Incidents register • Monthly waste tracking records

3.2 Compliance Performance

Compliance performance with the Project Approval was assessed from a review of Project documentation, audit observations and interviews with site representatives. **Table 3-2** provides a summary of the compliance performance. Full details of the auditors’ findings are documented within **Appendix 1** of this report. Non-compliances are identified in **Section 3.4**.

Table 3-2: Summary of compliance performance

Total number of conditions	183
Total number of ‘compliant’ conditions	46
Total number of ‘non-compliant’ conditions	2 ¹
Total number of ‘not triggered’ conditions	135

3.3 Summary of agency notices, orders, penalty notices or prosecutions

The Auditors are not aware of any agency notices, orders, penalty notices or prosecutions made against the facility during the audit period.

3.4 Non-compliances

Key non-compliances with the conditions of SSD-13895306 are noted in **Table 3-3**. Recommendations associated with each non-compliance detailed below are summarised in **Section 4**.

Table 3-3: Summary of non-compliances

NC#	Condition(s)	Non-compliance summary
NC1 ¹	E15, C2	The Environmental Management Plan (EMP) prepared for construction is not considered to have been prepared in accordance with the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> (DPIE (now ‘DPHI’) April 2020) (the Guideline) as required by Condition E15 of SSD-13895306.

¹ Whilst there are a total of two non-compliant conditions identified in this IEA, the total number of non-compliances remains as one as the two non-compliant conditions concern the same non-compliance issue.

NC#	Condition(s)	Non-compliance summary
		<p>Section 3.0 of the Guideline describes the minimum content recommended for an EMP which includes (but not limited to) the following:</p> <ul style="list-style-type: none"> • Timing of activities (Section 3.3.4) • Legal and compliance requirements (Section 3.5.3) • EMP review and revision process (Section 3.5.17) <p>Review of the EMP by the Auditors identified that the EMP does not adequately address the minimum content outlined in Section 3.0 of the Guideline for the points described above as follows:</p> <ul style="list-style-type: none"> • Table 2 of the EMP lists timing of activities for the current construction phase however this does not include the previously completed demolition phase or list the expected timeframes for the operation phase in accordance with the Guideline. Further, the timing of activities for the future construction activities (as part of subsequent stages) has not been included • A description of some of the conditions of consent applicable to the EMP and where they have been addressed was included for the Aboriginal Cultural Heritage Management Sub-Plan, Community Communication Strategy and the Construction Management Plan, however a consolidated list of all relevant consent conditions that relate to the requirements of the entire EMP under the consent (including this condition E15) was not provided • It is noted that the bottom of each page of the EMP notes "Review date: 05/06/2025", indicating that a review was scheduled for the EMP. However, the EMP does not include a section that notes the triggers for review from the Guideline. <p>For the reasons above, the Auditors also considered the requirements of Condition C2 of SSD-13895306 to be non-compliant as the above non-compliance with SSD-13895306 was identified during this IEA.</p>

3.5 Previous Audit Recommendations

The most recent Independent Environmental Audit of SSD-13895306 was conducted by EMM Pty Ltd and dated July 2024 (IEA #2). No non-compliances, observations or recommendations were identified in IEA#2.

3.6 Consultation Outcomes

A summary of the consultation undertaken for the purpose of this audit is provided in **Table 3-4**. There are no specific consultation requirements specified in the Development Consent besides the DPFI.

Table 3-4: Consultation outcomes

Agency	Comments	Where addressed
DPFI	Please ensure that the implementation of the Construction Environmental Management Plan (CEMP)	Section 3.6.1

	is thoroughly checked, with particular attention to the recommendations made in the Arborist Report (prepared by Abacus Tree Services).	
	Additionally, we request that you seek consultation with the Newcastle City Council to ensure all aspects are comprehensively reviewed.	This Table 3-4
Newcastle City Council	No comment.	N/A

3.6.1 Consultation Findings

The *Environmental Management Plan* by CPG and APP Group dated June 2024 (the EMP) provides an overview of the environmental aspects requiring management over the Project’s construction phase and appends various sub-plans prepared by other consultants (refer to **Table 3-1** for a complete list of sub-plans included in the EMP).

Section 6.0 of the EMP outlines the environmental aspects of consideration in the EMP which includes:

- Section 6.1 Stormwater, Sediment and Erosion Control
- Section 6.2 Air and Noise Emissions
- Section 6.3 Soils and Groundwater Contamination
- Section 6.4 Biodiversity and Natural Habitats
- Section 6.6 Hazardous Materials
- Section 6.7 Fire Control
- Section 6.8 Plant & Equipment
- Section 6.9 Product Selection and Site Consumption
- Section 6.10 Waste Management

Section 7.0 ‘Environmental Management Measures, Inspections and Monitoring’ then tabulates the environmental management measures, inspection and monitoring processes that will be followed as part of Core Project Groups existing Environmental Management System.

Based on the documentation and records reviewed, and the site inspection, the Auditors found that construction of the development was occurring generally in accordance with the EMP. Further, the lack of complaints and incidents during the Audit Period indicates the EMP is being implemented effectively by CPG.

However, with regards to the recommendations made in the Arborist Report, the Auditors observe the following with regards to the content of the EMP:

- Section 6.4 ‘Biodiversity and Natural Habitats’ of the EMP does not include reference to tree retention or protection
- No environmental actions, controls and criteria listed in Section 7.0 of the EMP relate to biodiversity, tree retention or protection
- The EMP does not reference the Arborist Report prepared by Abacus Tree Services within the main EMP nor any appended sub-plans.

The EMP is being implemented effectively by CPG. However, the EMP does not reference the Arborist Report or clearly describe the requirements made in the Arborist Report.

The recommendations that are made in the Arborist Report include both general and tree-specific measures applicable for the trees identified for retention as a result of the arborist assessment. The requirements of the Arborist Report are summarised in the following **Table 3-5**.

Table 3-5: Arborist Report Recommendations

Category	Tree ID	Arborist recommendations
Trees identified to be removed	1-25, 27-33, 52 (33 in total)	<ul style="list-style-type: none"> Removal overseen by qualified arborist prior to construction commencement.
Trees identified to be retained	26, 34-51, 53-56 (23 in total)	<ul style="list-style-type: none"> All civil contractors that enter the site are made aware of the importance of preserving retained trees and understand the tree protection measures that are put in place to preserve the retained trees. All stockpiles are maintained a minimum of nine metres away from retained trees. All parking and of vehicles and placement of machinery be kept a minimum of five metres from retained trees.
Specific protection measures		
Trees identified to be retained	26	<ul style="list-style-type: none"> No changes in the soil profile occur from the trunk to the proposed driveway within the Tree Protection Zone (TPZ).
	34-45, 56	<ul style="list-style-type: none"> No changes in the soil profile except for proposed development. Replacement grass is to be placed by non-mechanised methods inside the TPZ.
	42, 45, 56	<ul style="list-style-type: none"> Removal of any sections of concrete inside the TPZ of is to be undertaken by non-mechanised methods noting, retention of existing pathways is the preferred option of the arborist.
	46-51, 53-55	<ul style="list-style-type: none"> Protected by providing an area where no works occur, including retaining existing footpath and grass areas.
	26, 34-43	<ul style="list-style-type: none"> Protection fencing (recommended 1.8 metre interlocking chain wire fencing) to be installed a minimum of five metres on all sides (noting that for Tree 34, The boundary fencing is to extend to the practical limits on the western side). Protection fencing is to be installed before commencement of all civil/building works and remain in place until the release of the occupation certificate.

In addition to the requirements summarised in **Table 3-5**, the Arborist Report also states that the TPZ fencing be installed as per Figure 24 which has been reproduced as **Figure 3-1**.

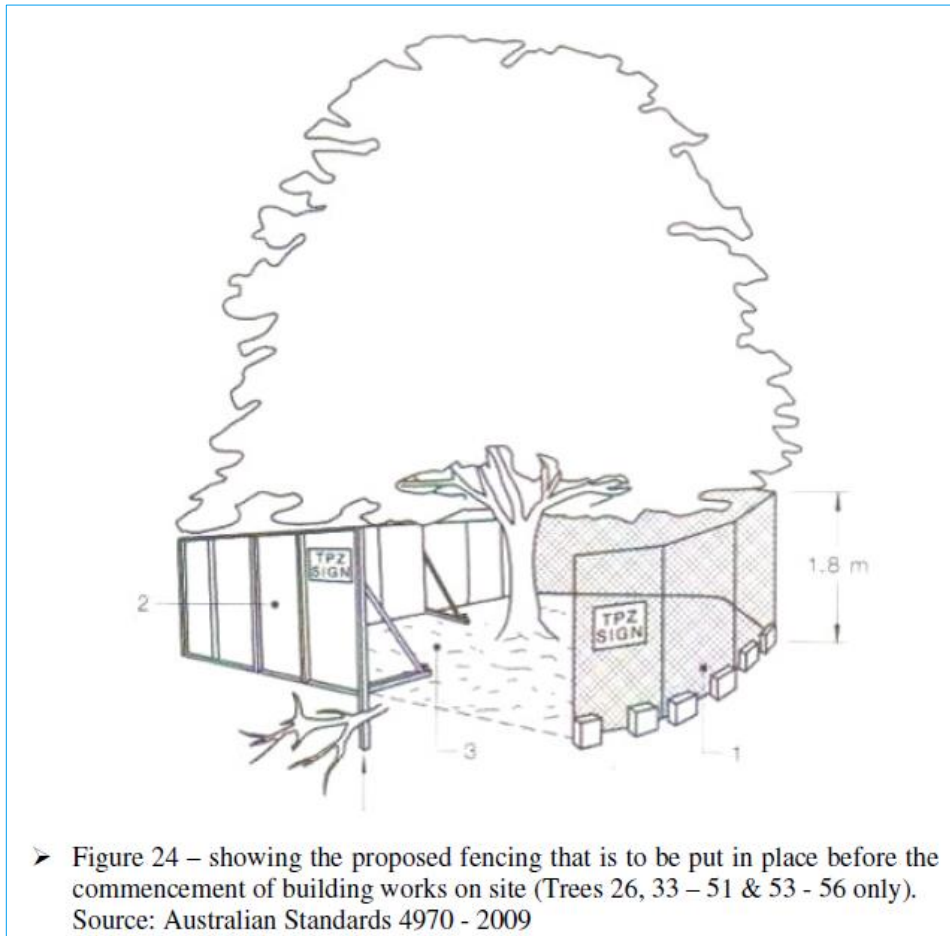


Figure 3-1: Arborist Recommendation for TPZ fencing

At the time of site inspection, the TPZ was observed to be in place for trees identified as '34' and '35'. The remainder of the trees were located on the other side of the construction fencing and away from construction works. The trees also were observed to have tree hoarding in place round the trunk which was not a recommendation of the Arborist report but implemented as additional protection (refer to photos 9 and 10 of **Appendix 3**). The Auditors did not inspect other trees identified for retention as they were located on the other side of the construction fencing within the school grounds and therefore, suitably protected from construction works.

The Auditors consider that the recommendations in the Arborist Report were adhered to by CPG during the Audit Period. Further, the trees have been confirmed to be in a healthy condition following inspection by a qualified arborist as per the *Construction Stage Inspection Report (Arborist)* by Abacus Tree Services dated 23 August 2024. However, the requirements of the Arborist Report are not clearly documented within the EMP. It is recommended that the EMP be revised to incorporate the management measures from the Arborist Report for clarity in documentation (refer to **Section 4.1**).

The Auditors also note there are errors in the approved Landscape Plans and contradictory findings in the Arborist Report with regards to the management of Tree '33' as follows:

- Section 1.0 (dot point #2) lists that Tree 33 is to be retained.
- Section 5.0 (page number #32) states that Tree 33 is earmarked for removal before commencement of building works on site.
- Section 5.2 states that Tree 33 is earmarked for removal.
- Section 6.0 (dot point #7 on page number #46) states that Tree 33 can be retained and incorporated into the development.
- Section 6.0 (dot point #7 on page number #47) states that Tree 33 requires removal to accommodate the proposed development.
- Section 7.0 (dot point #3) states that Tree 33 is to be retained and incorporated to the development.

The Landscape Plan (Drawing No. 2020_08 NG_DA_05) (reproduced as **Figure 3-2** below) shows the same contradiction around Tree 33. In the plan Tree 33 is identified as an 'existing tree to be removed' whilst in the adjacent table titled 'Existing Tree Schedule' Tree 33 is identified to be 'retained' in the 'action' column.

At the time of site inspection, the Auditors confirmed that Tree 33 was in fact removed but the Auditors reiterate that the requirements concerning tree protection in the pre-approval documents including the Arborist Report and the post-approval documents including the EMP are not clear. This lack of clarity may have contributed to the previous implementation and management issues with of this aspect as evidenced in the warning letters (refer to **Table 3-1**) received by the Applicant from the DPHI for matters that occurred outside of this Audit Period.

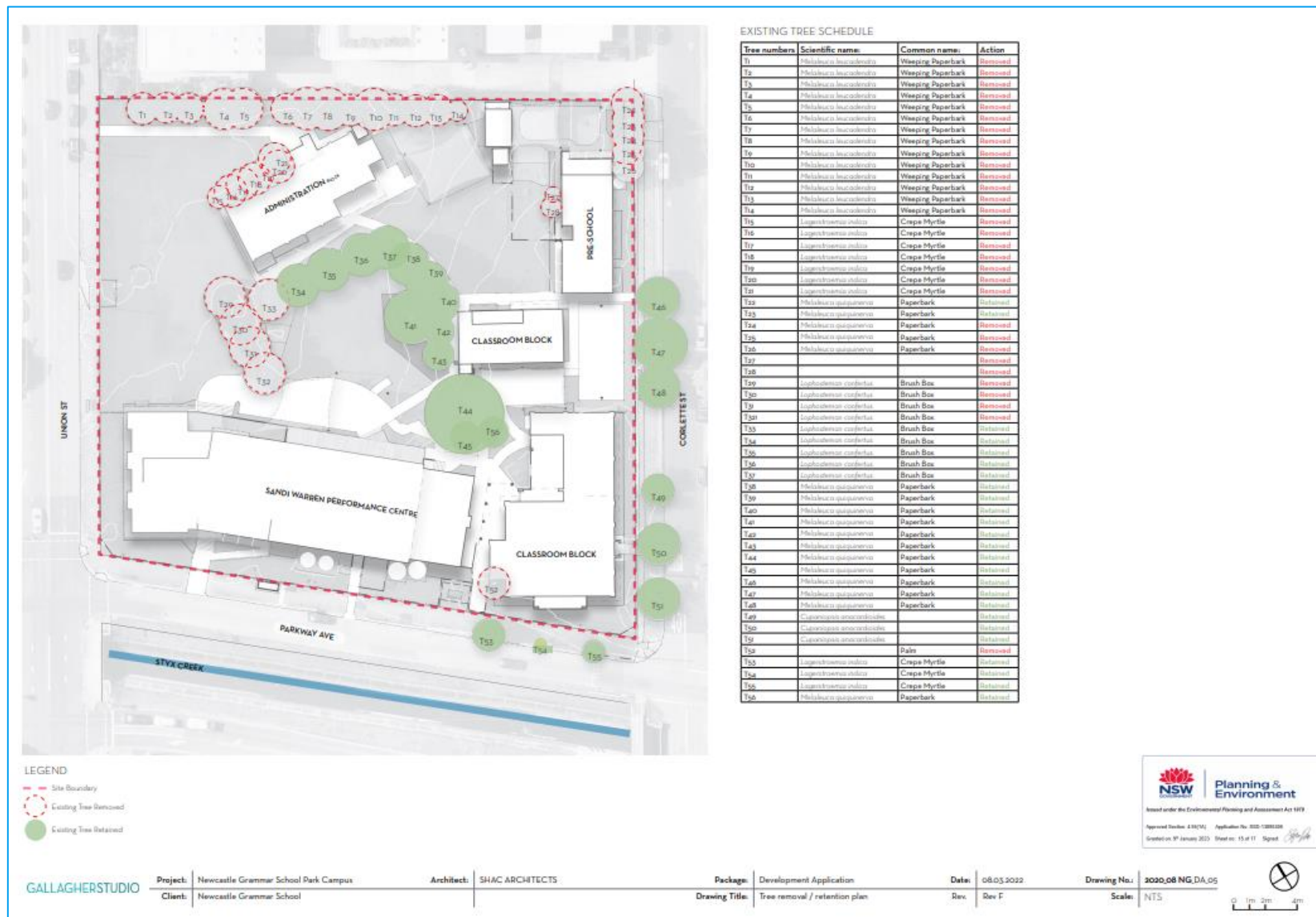


Figure 3-2: Landscape Plan (Drawing No. 2020_08 NG_DA_05) by SHAC Architects

3.7 EMP, Sub-plans and Post Approval Documents

The Project is managed under the *Environmental Management Plan* by CPG and APP Group dated June 2024 (the EMP). The most recent revision of the 2024 EMP including sub-plans (version 6 dated 05/06/24) received an endorsement from DPHI on 25/06/24. As discussed in **Section 2.2.4**, evaluation of post-approval documents is determined on the basis of whether there are 1) any non-compliances resulting from the implementation of the document; and 2) whether there are any opportunities for improvement in accordance with the IAPAR 2020.

The findings of this Audit included one non-compliance and one opportunity for improvement with respect to the EMP (refer to **Section 4**). The Audit identified that the CEMP prepared for construction is not considered to have been prepared in accordance with the *Environmental Management Plan Guideline: Guideline for Infrastructure Projects* (DPIE (now 'DPHI') April 2020) (the Guideline). Specifically, the EMP did not include:

- a timing of activities outside of construction phases; a consolidated summary of consent conditions applicable to the EMP and where they have been addressed
- a description of the triggers identified by the Guideline that would trigger a review of the EMP.

The Auditors also noted that the EMP did not reference the Arborist Report prepared by Abacus Tree Services within the main EMP nor any appended sub-plans which has been identified as an observation for improvement within this Audit.

As such, the Auditors consider that the EMP is generally adequate for the management of environment matters under SSD-13895306, however, improvements can be made.

3.8 Environmental Performance

The environmental performance of the Project is of a generally high standard. Sediment and erosion controls were suitably installed at the time of site inspection including the establishment of a hard stand access road, sediment fencing/coir logs and truck wash grid. Evidence of construction hours being adhered to was observed by the Auditors for the management of noise and vibration. A designated waste storage area for locating skip bins was also observed by the Auditors at the time of site inspection.

Further, the Site was observed to have a high standard of traffic management and controls in place. It was advised to the Auditors at the time of the site inspection that the traffic controller placed on the Corlette Street site entrance was available for the redirection of traffic to allow nearby residents to enter and leave their dwellings unimpeded by construction traffic associated with the Site. It was also advised that this traffic controller was available to engage with community, residents and school parents if required due to always being situated at the Corlette Street entrance, which receives a high amount of pedestrian traffic. The Auditors consider this to be a good strategy for community and traffic management associated with the development.

3.9 Actual versus Predicted Environmental Impacts

The Auditors have not identified inconsistencies between actual environmental impacts and the predicted environmental impacts.

3.10 Complaints

No complaints, as defined under SSD-13895306 and requiring notification of DPHI, have occurred during the Audit Period.

3.11 Incidents

No incidents, as defined under SSD-13895306 and requiring notification of DPHI, have occurred during the Audit Period.

3.12 Site Inspection and Interviews

The Auditors carried out a site inspection on 30 October 2024 accompanied by Project personnel referred to in **Section 2.2.5**. The majority of documents and records were provided electronically and reviewed off-site.

3.13 Key Strengths

The Auditors consider the Stage 1 construction management by CPG to be of a generally high standard in relation to site management, community engagement, environmental performance, traffic management and record keeping.

Environmental management systems and post-approval documents could be improved so that the requirements of SSD-13895306 development consent and the approved plans are well understood and able to be implemented.

4. Recommendations and Opportunities

Non-compliance Recommendations

A summary of non-compliance recommendations identified as part of this Audit is provided as **Table 4-1** with further details provided in the Independent Audit Table presented as **Appendix 1**.

Table 4-1: Non-compliance recommendations

NC#	Condition(s)	Recommendation
NC1	E15, C2	<p>The EMP is to be revised in accordance with Section 3.0 of the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> (DPIE (now 'DPHI') April 2020). This will allow the future construction activities (as part of subsequent stages) to be undertaken in accordance with a management plan compliant with the guideline. Updates to the EMP should include:</p> <ul style="list-style-type: none"> • Table 2 of the EMP (or where appropriate) which lists the timing of activities for the current construction phase should be expanded to include the expected timeframes for the Project's operational phase and the future construction activities (as part of subsequent Project stages). • A consolidated list of all relevant consent conditions that relate to the requirements of the entire EMP should be included in the EMP. • The EMP should include a list of triggers that prompt a review of the EMP in accordance with the Guideline which states an EMP should be reviewed and, where necessary, revised following: an incident (as defined by the conditions of consent); any non-compliance with the conditions of consent or other legal requirement; any non-conformance with any other environmental requirement; audit findings (internal, external and/or independent); project modifications approved by the consent or approval authority; and, changes to legislative requirement.

4.1 Opportunities for improvement

A summary of additional continuous improvement recommendations identified as part of this Audit is provided in **Table 4-2** with further details provided in the Independent Audit Table presented as **Appendix 1**.

Table 4-2: Continual improvement recommendations

Condition(s)	Recommendation
F19	The EMP is to be updated to incorporate the requirements of tree protection measures described in the Arborist Report dated 2021.

5. Conclusion

The Auditors assessed the development to be generally compliant with the conditions of approval in SSD-13895306. One non-compliance finding has been made in relation SSD-13895306 with regards to the adequacy of the Environmental Management Plan in place, however, the Auditors note that environmental performance was of a high-standard and no complaints or incidents have been recorded for the Audit Period. One opportunity for improvement was identified where the environmental management plan could be further improved.

Appendix 1

Audit Table for SSD-13895306

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #																								
PART A – ADMINISTRATIVE CONDITIONS																													
DETERMINATION OF FUTURE APPLICATIONS																													
A1.	In accordance with Section 4.22(4) of the EP&A Act all development under the Concept Proposal must be the subject of future development application(s), other than the development of Stage 1 that is subject to the conditions of consent in Schedule 3.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 subject to the conditions of consent in Schedule 3.	Compliant																									
A2.	The determination of future application(s) is to be not inconsistent with the terms of development consent SSD 1389506 as described in Schedule 1 and subject to the conditions in Parts A and B, Schedule 2.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	No additional applications or modifications to SSD-13895306 were sought by the Applicant during the Audit Period.	Not triggered																									
TERMS OF CONSENT																													
A3.	<p>The development may only be carried out if:</p> <p>(a) the plans are in compliance with the conditions of this consent</p> <p>(b) the plans are in accordance with all written directions of the Planning Secretary</p> <p>(c) the plans are generally in accordance with the EIS and Response to Submissions</p> <p>(d) the plans are in accordance with approved plans in the table below:</p> <p>Architectural Masterplan prepared by SHAC Project No. 4293</p> <table border="1"> <thead> <tr> <th>Dwg No.</th> <th>Rev</th> <th>Name of Plan</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>MP1.01</td> <td>D</td> <td>Proposed Masterplan</td> <td>07.10.21</td> </tr> <tr> <td>MP1.02</td> <td>E</td> <td>Masterplan – Ground Floor</td> <td>07.10.21</td> </tr> <tr> <td>MP1.03</td> <td>D</td> <td>Masterplan – First Floor</td> <td>07.10.21</td> </tr> <tr> <td>MP1.04</td> <td>D</td> <td>Masterplan – Second Floor</td> <td>07.10.21</td> </tr> <tr> <td>MP1.05</td> <td>B</td> <td>Masterplan – Roof</td> <td>07.10.21</td> </tr> </tbody> </table>	Dwg No.	Rev	Name of Plan	Date	MP1.01	D	Proposed Masterplan	07.10.21	MP1.02	E	Masterplan – Ground Floor	07.10.21	MP1.03	D	Masterplan – First Floor	07.10.21	MP1.04	D	Masterplan – Second Floor	07.10.21	MP1.05	B	Masterplan – Roof	07.10.21	<ul style="list-style-type: none"> Site inspection 30/10/24 This Audit Table NSW Government Major Projects Portal for SSD-13895306 Architectural Masterplan Set 4293 MP1.01- MP1.09 by SHAC dated 07/10/21 Landscape Plan Set by Gallagher Studio dated 08/03/2022 	<p>The requirements of this condition have been met during the Audit Period as follows:</p> <p>(a) Plans are considered to be in compliance as they form part of the development consent granted for SSD-13895306 on 09/01/23. The Auditors are not aware of any modifications to SSD-13895306.</p> <p>(b) Plans are considered to be in accordance with all written directions of the Planning Secretary. Two warning letters were issued by the DPHI during the Audit Period (dated 30/08/24 and 24/09/24). The first warning letter dated 30/08/24 was concerning Condition E1 of SSD-13895306 and was in regard to construction commencing prior to the date notified by the Applicant. This matter was</p>	Compliant	
Dwg No.	Rev	Name of Plan	Date																										
MP1.01	D	Proposed Masterplan	07.10.21																										
MP1.02	E	Masterplan – Ground Floor	07.10.21																										
MP1.03	D	Masterplan – First Floor	07.10.21																										
MP1.04	D	Masterplan – Second Floor	07.10.21																										
MP1.05	B	Masterplan – Roof	07.10.21																										

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)				Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	MP1.06	D	Masterplan – Blocking & Stacking	07.10.21	<ul style="list-style-type: none"> Response to submissions Redevelopment Masterplan and Stage 1 Refurbishment and Buildings Newcastle Grammar School, Park Campus by SLR Consulting Australia Pty Ltd dated April 2022 Newcastle Grammar School Park Campus – SSD13895306 Independent Environmental Audit #1 – Amended for RFI 68492218_2 by EMM Consulting Pty Ltd dated June 2024 (IEA #1) Newcastle Grammar School Park Campus – SSD13895306 Independent Environmental Audit #2 by EMM Consulting Pty Ltd 	<p>dealt with in IEA#1 and IEA#2 and falls outside of the Audit Period.</p> <p>The second warning letter dated 24/09/24 was concerning Condition F19 of SSD-13895306 by failing to implement tree protection during construction activities at the time of inspection by a DPHI officer on 15/01/24. This matter falls outside of the Audit Period, however, at the time of site inspection, the Auditors noted tree protection available on all trees within the Tree Protection Zone.</p> <p>(c) Plans are generally in accordance with the Environmental Impact Statement and Response to Submissions</p> <p>(d) Plans are considered to be in accordance with the Architectural Masterplan Set 4293 MP1.01-MP1.09 and Landscape Plan Set.</p>		
	MP1.07	A	Masterplan – Stage 01 Ground Floor	07.10.21				
	MP1.08	A	Masterplan – Stage 01 First Floor	07.10.21				
	MP1.09	A	Masterplan – Stage 01 Second Floor	07.10.21				
Updated Landscape Plan prepared by GallagherStudio								
	Dwg No.	Rev	Name of Plan	Date				
	2020_08 NG_DA_07	F	Landscape Plan	08.03.2022				
	2020_08 NG	F	Union Street Building Rooftop Basketball Court	08.03.2022				
	2020_08 NG_DA_02	F	Section AA	08.03.2022				
	2020_08 NG_DA_03	F	Section BB	08.03.2022				
	2020_08 NG_DA_04	F	Indicative Precedents	08.03.2022				
	2020_08 NG_DA_05	F	Tree Removal / Retention Plan	08.03.2022				
	2020_08 NG_DA_06	F	Indicative Planting	08.03.2022				
	202008_LA301	A	Materials & Fisheries Plan 01	09.06.2022				

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
		<p>dated July 2024 (IEA #2)</p> <ul style="list-style-type: none"> Letter correspondence Subject: <i>Warning Letter – Breach of Section 4.21(1) of the Environmental Planning and Assessment Act 1979</i> by DPHI dated 30/08/2024 Letter correspondence Subject: <i>Warning Letter – Breach of Section 4.21(1) of the Environmental Planning and Assessment Act 1979</i> by DPHI dated 24/09/2024 			
A4.	<p>Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:</p> <p>(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;</p> <p>(b) any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and</p>	<ul style="list-style-type: none"> Letter correspondence Subject: <i>Warning Letter – Breach of Section 4.21(1) of the Environmental Planning and Assessment Act</i> 	<p>Noted. The Department of Planning, Housing and Infrastructure (DPHI) issued two warning letters to the Applicant during the Audit Period.</p>	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	(c) the implementation of any actions or measures contained in any such document referred to in (a) above.	<p>1979 by DPHI dated 30/08/2024</p> <ul style="list-style-type: none"> Letter correspondence <i>Subject: Warning Letter – Breach of Section 4.21(1) of the Environmental Planning and Assessment Act</i> <p>1979 by DPHI dated 24/09/2024</p>			
A5.	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition C2(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition C2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		Noted. No inconsistencies, ambiguities or conflicts between the documents listed in condition C2(c) and the conditions of this consent or the directions of the Planning Secretary were identified during this Audit.	Not triggered	
LIMITS OF CONSENT					
A6.	This consent lapses five years after the date of consent unless work is physically commenced within the meaning of Section 4.53 of the EP&A Act.	<ul style="list-style-type: none"> IEA#1 IEA#2 	Works physically commenced on 14 September 2023, in accordance with the requirements of this condition to be less than five years following the date of consent which is dated 09 January 2023.	Compliant	
A7.	This approval does not allow any components of the concept proposal to be carried out without further approval or consent being obtained from the relevant consent authority (other than the development of Stage 1 that is subject to the conditions of consent in Schedule 3).	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 subject to the conditions of consent in Schedule 3.	Compliant	
STAFF AND STUDENT NUMBERS					

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #															
A8.	<p>The maximum student and staff population at the school onsite at any one time must not exceed the total student and staff numbers provided in the table below, for each relevant stage.</p> <p>Notwithstanding, the maximum student population may be exceeded by a maximum of 10 additional students from time to time, to allow for unanticipated fluctuations on a temporary basis. The staff numbers on site may be exceeded in the event that it is needed to support students with disabilities or changes in legislation regarding staffing ratios.</p> <table border="1"> <thead> <tr> <th>Stage</th> <th>Maximum Students</th> <th>Maximum Staff</th> </tr> </thead> <tbody> <tr> <td>Prior to the completion of Stage 1</td> <td>256</td> <td>35</td> </tr> <tr> <td>At the completion of Stage 1</td> <td>480</td> <td>50</td> </tr> <tr> <td>At the completion of Stage 2</td> <td>640</td> <td>60</td> </tr> <tr> <td>At the completion of Stage 3</td> <td>640</td> <td>60</td> </tr> </tbody> </table>	Stage	Maximum Students	Maximum Staff	Prior to the completion of Stage 1	256	35	At the completion of Stage 1	480	50	At the completion of Stage 2	640	60	At the completion of Stage 3	640	60	<ul style="list-style-type: none"> Site inspection 30/10/24 Email correspondence (David Frazer, NGS on 09/12/24) 	<p>Email correspondence from David Frazer of Newcastle Grammar School was viewed by the Auditors. The email included evidence that the maximum number of student and staff numbers for the current stage identified as 'prior to the completion of Stage 1' was adhered to as per the requirements of this condition. The email correspondence demonstrated that during the Audit Period, a maximum number of 238 students and 35 full-time equivalent staff were reported for the Park Campus as shown in a screen clip of the school's system for recording staff and student numbers.</p>	Compliant	
Stage	Maximum Students	Maximum Staff																		
Prior to the completion of Stage 1	256	35																		
At the completion of Stage 1	480	50																		
At the completion of Stage 2	640	60																		
At the completion of Stage 3	640	60																		
PART B – CONDITIONS TO BE SATISFIED IN FUTURE DEVELOPMENT APPLICATIONS																				
BUILD DESIGN																				
B1.	<p>All future development applications relating to the concept development will include:</p> <p>(a) detailed plans, elevations and sections;</p> <p>(b) a design statement demonstrating the design quality of the proposed development having regard to the existing buildings on site, and the character of surrounding development;</p> <p>(c) a Crime Prevention Through Environmental Design (CTPED) assessment, which details measures to maximise the safety of students, staff and public; and</p> <p>(d) an Urban Design Report including artist's perspectives and photomontages.</p>	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	<p>At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/ or submitted by the Applicant during the Audit Period.</p>	Not triggered																

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
B2.	All future built form must be contained wholly within the approved envelopes, illustrated in the approved plans referenced at Schedule 2 Condition A3.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been sought by the Applicant during the Audit Period.	Not triggered	
TRAFFIC AND PARKING					
B3.	Any future development application, proposing the student and staff numbers nominated for Stage 2 or Stage 3 described in Schedule 2 Condition A8, will provide parking for a minimum of 37 vehicles, 2 motorcycles and a total of 70 bicycles across the whole site.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
B4.	Any future development application, proposing the student and staff numbers nominated for Stage 2 or Stage 3 described in Schedule 2 Condition A8, will include traffic modelling for the signalised intersection of Union Street and Parkway Avenue. The modelling is required to demonstrate that there would be sufficient intersection capacity to support the increase in student numbers.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/ or submitted by the Applicant during the Audit Period.	Not triggered	
LANDSCAPING					
B5.	Any future development application will include detailed landscape plans identifying any vegetation to be removed or relocated, and the location of any replacement plantings and/or additional landscaping.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
ECOLOGICAL SUSTAINABLE DEVELOPMENT					

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
B7.	Where relevant, the future development applications for new built form must demonstrate how the principles of Ecologically Sustainable Development have been incorporated into the design, construction, and on-going operation of the building.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
DISABILITY ACCESS					
B8.	All future development applications for any new built form will be accompanied by a Disability Access Review to demonstrate an appropriate degree of accessibility in accordance with the <i>Disability (Access to Premises – buildings) standards 2010</i> (the Premises Standards).	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
NOISE AND VIBRATION					
B9.	All future development applications for demolition and/or any new built form will be accompanied by a Noise and Vibration Impact Assessment that identifies and provides a quantitative assessment of the main noise generating sources and activities at all stages of construction, and any noise sources during operation. Details are to be provided outlining any mitigation measures to ensure the amenity of adjoining sensitive receivers are protected throughout the construction and operational periods.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
CONTAMINATION					
B10.	All future development applications for demolition and/or any new built form will be accompanied by a Detailed Site Investigation Report, including an assessment of potential site contamination.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
B11.	Should the investigations required by condition B10 identify that remediation works are required, that a RAP will be prepared by a suitably qualified consultant.		Refer to response to Condition B10.	Not triggered	
FLOODING					
B12.	All future development applications for demolition and/or any new built form will be accompanied by a contemporary flood assessment to assess the impacts of the development, including any changes to flood risk on-site or off-site, and detail design solutions and operational procedures to mitigate flood risk. The flood assessment must take into consideration any current flood policy or guide.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
B13.	All future development applications for demolition and/or any new built form will include a revised flood emergency response plan (FERP) prepared in consultation with a suitably qualified flood and emergency consultant. The FERP submitted with future applications must take into consideration any learnings from the implementation of the Stage 1 FERP.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
CONSTRUCTION TRAFFIC AND PEDESTRIAN MANAGEMENT PLAN					
B14.	Due to ongoing school operations and limited on-site parking, all future development applications for demolition and/or any new built form must be accompanied by a preliminary Construction Traffic and Pedestrian Management Plan (CTPMP) detailing vehicle routes, number of trucks, hours of operation, access arrangements and traffic control measures.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
GEOTECHNICAL					
B15.	Where relevant all future development application for any new built form must be accompanied by a detailed Geotechnical Report. The report must consider any required dewatering of the site and describe any potential environmental impacts resulting from works required to achieve a stable landform.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
		Passfield, APP, on 30/10/24)			
WASTE					
B16.	Where relevant, all future development applications must be accompanied by a Waste Management Plan to address storage, collection, and management of waste and recycling generated by the development.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
UTILITIES					
B17.	Where relevant, all future development applications must address the existing capacity and augmentation requirements of the development on the provision of utilities, including staging of infrastructure through the preparation of an Infrastructure Management Plan in consultation with relevant agencies and service providers.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
Public Space					
B18.	All future development applications that propose an increase in student numbers must demonstrate that National Park has sufficient capacity for school activities.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	At the time of Audit, all development has been limited to Stage 1 works only. No development applications relating to concept development have been prepared and/or submitted by the Applicant during the Audit Period.	Not triggered	
SCHEDULE 3 CONDITIONS OF CONSENT FOR STAGE 1					
PART C – ADMINISTRATIVE CONDITIONS FOR STAGE 1					
OBLIGATIONS TO MINIMISE HARM TO THE ENVIRONMENT					
C1.	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be	<ul style="list-style-type: none"> This Audit Table 	All required Management plans are in place as per the conditions of approval. Works	Compliant	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #												
	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.	<ul style="list-style-type: none"> Site inspection 30/10/24 Environmental Management Plan by Core Project Group and APP Group and dated 05/06/2024 (the '2024 EMP') Aboriginal Cultural Heritage Management Sub-Plan by Heritage Now Pty Ltd dated 01/11/2023 (the '2023 ACHMSP') Complaints register Incident register 	<p>undertaken at the time of this audit were considered to be in accordance with these plans and performance measures.</p> <p>The Auditors have no reason to believe that development has caused material harm to the environment based on the lack of complaints and incidents during the Audit Period.</p>														
C2.	<p>The development may only be carried out:</p> <p>(a) in compliance with the conditions of this consent;</p> <p>(b) in accordance with all written directions of the Planning Secretary;</p> <p>(c) generally in accordance with the EIS, Request for Information Response (RFI), and Response to Submissions;</p> <p>(d) in accordance with the approved plans in the table below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="4">Stage 01 Architectural prepared by SHAC Project No. 4293</th> </tr> <tr> <th>Dwg No.</th> <th>Rev</th> <th>Name of Plan</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>2.01</td> <td>E</td> <td>Site Plan – Demolition</td> <td>11.03.22</td> </tr> </tbody> </table>	Stage 01 Architectural prepared by SHAC Project No. 4293				Dwg No.	Rev	Name of Plan	Date	2.01	E	Site Plan – Demolition	11.03.22	<ul style="list-style-type: none"> This Audit Table Site inspection 30/10/24 Letter correspondence Subject: <i>Warning Letter – Breach of Section 4.21(1) of the Environmental Planning and Assessment Act</i> 	<p>The requirements of this condition have generally been met during the Audit Period as follows:</p> <p>(a) The Auditors consider the development to have been carried out generally in accordance with the conditions of consent. However, as non-compliances with SSD-13895306 were identified as noted in this table (refer to NC1) the requirements of this condition is therefore considered non-compliant.</p>	Non-compliant	Refer to NC1
Stage 01 Architectural prepared by SHAC Project No. 4293																	
Dwg No.	Rev	Name of Plan	Date														
2.01	E	Site Plan – Demolition	11.03.22														

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)			Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
2.02	P	Site Plan – Proposed	11.03.22	<p>1979 by DPHI dated 30/08/2024</p> <ul style="list-style-type: none"> Letter correspondence Subject: <i>Warning Letter – Breach of Section 4.21(1) of the Environmental Planning and Assessment Act 1979</i> by DPHI dated 24/09/2024 	<p>Recommendation: Refer to recommendation provided in NC1.</p> <p>(b) Plans are considered to be in accordance with all written directions of the Planning Secretary. Two warning letters were issued by the DPHI during the Audit Period (dated 30/08/24 and 24/09/24). The first warning letter dated 30/08/24 was concerning Condition E1 of SSD-13895306 and was in regard to construction commencing prior to the date notified by the Applicant. This matter was dealt with in IEA#1 and IEA#2 and falls outside of the Audit Period. The second warning letter dated 24/09/24 was concerning Condition F19 of SSD-13895306 by failing to implement tree protection during construction activities at the time of inspection by a DPHI officer on 15/01/24. This matter falls outside of the Audit Period, however, at the time of site inspection, the Auditors noted tree protection available on all trees within the Tree Protection Zone.</p> <p>(c) Plans are generally in accordance with the Environmental Impact Statement and Response to Submissions</p> <p>(d) Plans are considered to be in accordance with the Stage 01 Architectural prepared by SHAC Project No. 4293, Landscape Plan prepared by GallagherStudio, Finishes Schedule prepared by SHAC, and</p>		
2.10	A	Play space Analysis – Stage 01	11.03.22				
SK0.6	C	Staging Diagram	27.08.21				
2.11	O	Block B Ground Floor Plan	11.03.22				
2.12	M	Block B First Floor Plan	15.10.21				
2.13	G	Block B Elevations – South & East	15.10.21				
2.14	G	Block B Elevations – North & West	15.10.21				
2.15	F	Block B Sections 01	15.10.21				
2.16	E	Block B Sections 02	15.10.21				
2.17	A	Demolition Plan – Ground Floor	16.11.20				
2.18	A	Demolition Plan – First Floor	16.11.20				
2.19	E	Stage 02 Ground Floor Plan	29.03.21				
2.110	A	Stage 02 First Floor Plan	29.03.21				
2.21	Q	Ground Floor Plan	11.03.22				
2.22	P	First Floor Plan	15.10.21				
2.23	P	Second Floor Plan	15.10.21				
2.24	O	Rooftop Play	15.10.21				
2.25	E	Roof Plan	15.10.21				
2.26	E	Elevations – Site	11.03.22				
2.27	K	Elevations – West	11.03.22				
2.28	L	Elevations – North & South	11.03.22				
2.29	L	Elevations – East	11.03.22				
2.30	H	Sections 01	15.10.21				
2.31	H	Sections 02	15.10.21				

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #																																												
	<p>2.32 D Signage 15.10.21</p> <p>Landscape Plan prepared by GallagherStudio</p> <table border="1"> <thead> <tr> <th>Dwg No.</th> <th>Rev</th> <th>Name of Plan</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>2020_08</td> <td>F</td> <td>Landscape Plan</td> <td>08.03.22</td> </tr> <tr> <td>NG_DA_01_</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Finishes Schedule prepared by SHAC</p> <table border="1"> <thead> <tr> <th>Dwg No.</th> <th>Rev</th> <th>Name of plan</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Finishes Schedule</td> <td>A</td> <td>4293 NGS Park Campus Stage 1 – Finishes Schedule</td> <td>-</td> </tr> </tbody> </table> <p>Stormwater Management Plan prepared by Lindsay Dynan</p> <table border="1"> <thead> <tr> <th>Dwg No.</th> <th>Rev</th> <th>Name of Plan</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>16194-LD-DR-C-0000</td> <td>P02</td> <td>Cover Sheet & Drawing List</td> <td>13/10/2021</td> </tr> <tr> <td>16194-LD-DR-C-0010</td> <td>P02</td> <td>Erosion & Sediment Control Plan</td> <td>13/10/2021</td> </tr> <tr> <td>16194-LD-DR-C-0011</td> <td>P02</td> <td>Erosion & Sediment Control Plan</td> <td>13/10/2021</td> </tr> <tr> <td>16194-LD-DR-C-0020</td> <td>P03</td> <td>Stormwater Drainage Plan</td> <td>30/10/2021</td> </tr> <tr> <td>16194-LD-DR-C-0025</td> <td>P02</td> <td>Civil Details</td> <td>13/10/2021</td> </tr> </tbody> </table>	Dwg No.	Rev	Name of Plan	Date	2020_08	F	Landscape Plan	08.03.22	NG_DA_01_				Dwg No.	Rev	Name of plan	Date	Finishes Schedule	A	4293 NGS Park Campus Stage 1 – Finishes Schedule	-	Dwg No.	Rev	Name of Plan	Date	16194-LD-DR-C-0000	P02	Cover Sheet & Drawing List	13/10/2021	16194-LD-DR-C-0010	P02	Erosion & Sediment Control Plan	13/10/2021	16194-LD-DR-C-0011	P02	Erosion & Sediment Control Plan	13/10/2021	16194-LD-DR-C-0020	P03	Stormwater Drainage Plan	30/10/2021	16194-LD-DR-C-0025	P02	Civil Details	13/10/2021		Stormwater Management Plan prepared by Lindsay Dynan.		
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C3.	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Application 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;	<ul style="list-style-type: none"> Letter correspondence <i>Subject: Warning Letter – Breach of Section 4.21(1) of the Environmental</i> 	Noted. The Department of Planning, Housing and Infrastructure (DPHI) issued two warning letters to the Applicant during the Audit Period.	Not triggered																																													

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	(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.	<i>Planning and Assessment Act 1979</i> by DPHI dated 30/08/2024 <ul style="list-style-type: none"> Letter correspondence <i>Subject: Warning Letter – Breach of Section 4.21(1) of the Environmental Planning and Assessment Act 1979</i> by DPHI dated 24/09/2024 			
C4.	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition C2(c) or Error! Reference source not found (sic).. In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition C2(c) and Error! Reference source not found (sic)., the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.		Noted. No inconsistencies, ambiguities or conflicts between the documents listed in condition C2(c) and the conditions of this consent or the directions of the Planning Secretary were identified during this Audit.	Not triggered	
Limits of Consent					
C5.	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.	<ul style="list-style-type: none"> IEA #1 IEA #2 	Works physically commenced on 14 September 2023, in accordance with the requirements of this condition to be less than five years following the date of consent which is dated 09 January 2023.	Compliant	
Prescribed Conditions					
C6.	The Applicant must comply with all relevant prescribed conditions of development consent under part 6, Division 8A of the EP&A Regulation 2000.	<ul style="list-style-type: none"> This Audit Table Site inspection 30/10/24 IEA#1 	The Auditors note that the 'EP&A Regulation 2000' cited in this condition was repealed by Section 10(2) of the <i>Subordinate Legislation Act 1989</i> No 146 with effect from 01/03/22.	Compliant	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
		<ul style="list-style-type: none"> IEA #2 	<p>For the purposes of completing the audit, the Auditors have reviewed the same prescribed conditions that were audited in IEA#1 and IEA#2 which included:</p> <ul style="list-style-type: none"> Condition 98 – Compliance with Building Code of Australia and insurance requirements under the <i>Home Building Act 1989</i>. This condition is considered to be met for the Audit Period as construction certificates are being progressively issued by the private certifier (NewCert Pty Ltd). 98A – Erection of signs. This condition is considered to be met for the Audit Period as all signage included name, address and number of principal certifier, the name of the principal contractor (CPG) and a sign that stated unauthorised entry to the work site is prohibited were observed at time of site inspection. 		
Planning Secretary as Moderator					
C7.	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary’s resolution of the matter must be binding on the parties.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	The Auditors are not aware of any disputes between the Applicant and any public authorities during the Audit Period. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Evidence of Consultation					

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
C8.	<p>Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <p>(a) consult with the relevant party prior to submitting the subject document for information or approval; and</p> <p>(b) provide details of the consultation undertaken including:</p> <p>(i) the outcome of that consultation, matters resolved and unresolved; and</p> <p>(ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p>	<ul style="list-style-type: none"> This Audit Table Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	<p>Site personnel correspondence confirmed that no consultation occurred during the Audit Period. Therefore, this requirement was not triggered during the Audit Period.</p>	Not triggered	
Staging					
C9.	<p>Stage 1 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).</p>	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	<p>Site personnel correspondence confirmed Stage 1 works are not being completed in stages. Therefore, this condition has not been triggered during the Audit Period.</p>	Not triggered	
C10.	<p>A Staging Report prepared in accordance with condition C9 must:</p> <p>(a) if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish;</p> <p>(b) if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant);</p>		<p>Refer to response to Condition C9.</p>	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	(c) specify how compliance with conditions will be achieved across and between each of the stages of the project; and (d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.				
C11.	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.		Refer to response to Condition C9.	Not triggered	
C12.	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 including independent auditing requirements.		Refer to response to Condition C9.	Not triggered	
Staging, Combining and Updating Strategies, Plans or Programs					
C13.	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	<ul style="list-style-type: none"> NSW Government Major Projects Portal for SSD-13895306 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	No new plans, updates to existing plans or consolidation of existing plans have been prepared by the Applicant during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	measures or amendments to improve the environmental performance of the development).				
C14.	Any strategy, plan or program prepared in accordance with condition C13, where previously approved by the Planning Secretary under this consent, will be submitted to the satisfaction of the Planning Secretary.		Refer to response to Condition C13.	Not triggered	
C15.	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.		Refer to response to Condition C13.	Not triggered	
C16.	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.		Refer to response to Condition C13.	Not triggered	
Structural Adequacy					
C17.	<p>All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA and any additional requirements of Subsidence Advisory NSW where the building or structure is located on land within a declared Mine Subsidence District.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • <i>Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development.</i> • <i>Under section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of Subsidence Advisory NSW's approval before carrying out certain development in a Mine Subsidence District.</i> 	<ul style="list-style-type: none"> • Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) • IEA #2 	<p>No new buildings or structures or any alterations or additions to existing buildings and structures have been completed during the Audit Period.</p> <p>Further, IEA#2 documented compliance with this condition for the previous Audit Period stating "SANSW approval received on 18/12/2023 for the final mine grouting works Approval".</p>	Not triggered	
External Walls and Cladding					
C18.	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	<ul style="list-style-type: none"> • Site personnel correspondence (Jennifer 	<p>No new external walls erected during the Audit Period.</p> <p>Further, IEA#2 documented compliance with this condition for the previous Audit Period</p>	Not triggered	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
		Passfield, APP, on 30/10/24) <ul style="list-style-type: none"> IEA #2 	stating "CC1 issued for construction at the time of the audit on 5/1/24. External wall cladding and finishes were provided to the certifier prior to this certificate as part of this process. DPFI were notified as required".		
Applicability of Guidelines					
C19.	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.		Noted.	Not triggered	
C20.	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.		Noted.	Not triggered	
Monitoring and Environmental Audits					
C21.	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, site audit report and independent auditing. <i>Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i>	<ul style="list-style-type: none"> This Audit 2024 EMP Newcastle Grammar School Construction Noise and Vibration Management Plan by RCA Australia Pty Ltd dated 12/02/2024 (the '2024 CNVMP') Complaints register 	This Audit has been completed in accordance with the requirements of this condition and Condition F37 through to Condition F42 which stipulates the requirement for an Independent Environmental Audit. Monitoring required under this consent by way of the 2024 EMP includes noise and vibration monitoring in accordance with the sub-plan the 2024 CNVMP. However, in accordance with the 2024 CNVMP, vibration monitoring is only required at the start of a new phase of construction and noise monitoring is only required upon receiving a complaint. As there was no commencement of a new phase of construction or receipt of a noise related	Compliant	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
			complaint during the Audit Period, no monitoring was undertaken for the Audit Period.		
Access to Information					
C22.	<p>At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <p>(a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <ul style="list-style-type: none"> (i) the documents referred to in condition C2 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 <p>(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.</p>	<ul style="list-style-type: none"> • NGS Park Campus website • NSW Government Major Projects Portal for SSD-13895306 • 2024 EMP 	<p>The requirements under this condition have been met during the Audit Period as follows:</p> <p>(a) The information and documents listed under this condition were or were not listed in the NGS Park Campus website as follows:</p> <ul style="list-style-type: none"> (i) Documents listed in C2 of this consent is available as a link to the Major Projects Portal for SSD-13895306; (ii) All current and statutory approvals for the development are available as a link to the Major Projects Portal for SSD-13895306; (iii) The 2024 EMP and 2023 ACHMSP are available as a link to download; (iv) Review of the 2024 EMP inclusive of sub-plans indicates that there are no reporting arrangements prescribed for the Applicant that relate to the requirements of this condition. (v) No environmental monitoring was required during the Audit Period. Therefore, this sub-requirement was not triggered. (vi) A summary of the current stage and progress of the development is provided as a table under the subheading 'logistics'; 	Compliant	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
			<p>(vii) Contact details are listed es as 'Enquiries or comments: parkbuild@ngs.nsw.edu.au';</p> <p>(viii) A complaints register is included as a link to download for each month inclusive of September 2023 to October 2024;</p> <p>(ix) Audit Reports are available for both IEA#1 and IEA#2 as a link to download;</p> <p>(x) The Auditors are not aware of any additional matters required by the Planning Secretary.</p> <p>(b) As operation of Stage 1 has not commenced, this sub-requirement is not triggered for the Audit Period.</p>		
Compliance					
C23.	The Applicant must ensure that all 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.	<ul style="list-style-type: none"> Site inspection 30/10/2024 Site Induction Form dated 06/11/2024 	An example site induction record was viewed by the Auditors. The site induction includes a summary of the health, safety and environmental management of the site and included a short quiz to ensure inductees were competent in the induction material. The Auditors were required to undertake an induction prior to the site inspection.	Compliant	
Incident Notification, Reporting and Response					
C24.	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.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) Incidents register 	Site personnel correspondence confirmed that no incidents occurred during the Audit Period that required notification to the Planning Secretary. This was further confirmed during review of Incidents register for the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
C25.	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 12.		Refer to response to Condition C24.	Not triggered	
Non-Compliance Notification					
C26.	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.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	Site personnel correspondence confirmed that no non-compliances occurred during the Audit Period that required notification to the Planning Secretary.	Not triggered	
C27.	The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance		Refer to response to Condition C26.	Not triggered	
C28.	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance		Refer to response to Condition C26.	Not triggered	
Revision of Strategies, Plans and Programs					
C29.	Within three months of: <ul style="list-style-type: none"> (a) the submission of a compliance report under condition C32; (b) the submission of an incident report under condition C25¹; (c) the submission of an Independent Audit under condition F37; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under condition C3 which requires a review, 	<ul style="list-style-type: none"> Letter correspondence subject: <i>Newcastle Grammar School – Park Campus (SSD-13895306) Revised Aborist Report, Conditions C29</i> 	The requirements under this condition have been met during the Audit Period as follows: <ul style="list-style-type: none"> (a) the requirement to submit a compliance report under condition C32 has not been triggered; (b) the requirement to submit an incident report under condition C25; (c) the submission of IEA#2 did not trigger a review of any strategies, plans and programs; 	Not triggered	

¹The Auditors assume the wording of consent condition C28(b) is intended to refer to Condition 'C25' and not 'C252'.

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	<p>and C30 by DPHI dated 17/05/24</p> <ul style="list-style-type: none"> IEA#2 	<p>(d) no modification applications were sought by the Applicant during the Audit Period;</p> <p>(e) no directions from the Planning Secretary triggered a review of any strategies, plans and programs;</p> <p>Therefore, this requirement was not triggered for the Audit Period.</p>		
C30.	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and/or information (where relevant) within six weeks of the review.</p> <p><i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i></p>	<ul style="list-style-type: none"> Email correspondence Subject: <i>RE: Newcastle Grammar School sSD-13895306 Condition C30 Revised Arborist Report</i> dated 08/05/24 Letter correspondence 	<p>The Applicant undertook a revision of the Arborist Report dated 21 June 2021, prepared by Abacus Tree Services to include Appendix 4 'Tree Pruning Specification' as advised by the project Arborist to improve the environmental performance of the development.</p> <p>The Applicant submitted the revised Arborist Report to the satisfaction of the Certifier (NewCert) and of the DPHI as evidenced by email and letter correspondence.</p>	Compliant	
Compliance Reporting					
C31.	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).		The reporting requirements of the <i>Compliance Reporting Post Approval Requirements (2020)</i> guide relates to operational-phase reporting. The Audit Period included construction activities only and therefore, this requirement is not triggered.	Not triggered	
C32.	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.		Refer to response to Condition C31.	Not triggered	
C33.	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.		Refer to response to Condition C31.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
C34.	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.		Refer to response to Condition C31.	Not triggered	
Part D – Prior to the Issue of a Construction Certification for Stage 1					
External Walls and Cladding					
D1.	Prior to the issue of any 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.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	No construction certificates were issued during the Audit Period relating to external walls and cladding, and therefore, this requirement was not triggered.	Not triggered	
Storm Water Management System					
D2.	Prior to the issue of any construction certificate, the Applicant must design an operational stormwater management system for the development and submit it to the Certifier for approval. The system must: <ol style="list-style-type: none"> be designed by a suitably qualified and experienced person(s); direct roof water to the proposed water tank with a minimum capacity of 25,000 litres and being reticulated to any new toilet cisterns and cold water washing machine taps, with a mains water top up being installed to maintain between 10% and 15% of the tank capacity. Alternatively, an electronically activated mechanical valve device is to be installed to switch any new toilet cisterns and laundry taps to mains water when the tank falls below 10% capacity. The water tank and plumbing are to be designed in accordance with the Plumbing Code of Australia (National Construction Code Volume 3). 	<ul style="list-style-type: none"> NL221250 Construction Certificate by Northrop Consulting Engineers Pty Ltd dated 28/11/2023 	Review of the construction certificate issued by Northrop Consulting Engineers Pty Ltd for the detailed design of the civil engineering package indicates the requirements of Condition D2 were satisfied for the Audit Period.	Compliant	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<p>(c) be designed and managed in accordance with the requirements of Section 7.06 'Stormwater' of the Newcastle Development Control Plan 2012, the associated Technical Manual and the latest issue of AS 3500.3 as applicable, as indicated on the stormwater management concept plan prepared by Lindsay Dynan Consulting Engineers (Drg. No. 16194-LD-DR-C-0020, Revision P03, dated 30/03/2022).</p> <p>(d) be in accordance with applicable Australian Standards; and</p> <p>(e) ensure that the system capacity has been designed in accordance with <i>Australian Rainfall and Runoff</i> (Engineers Australia, 2016) and <i>Managing Urban Stormwater: Council Handbook</i> (EPA, 1997) guidelines.</p>				
Operational Noise – Design of Mechanical Plant and Equipment					
D3.	<p>The Applicant must, prior to the issue of any construction certificate of mechanical plant and equipment:</p> <p>(a) an assessment of mechanical plant and equipment must be undertaken by a suitably qualified person and must demonstrate compliance with the project noise trigger levels as recommended in Table 5 of the Noise Impact Assessment dated 12 October 2021 and prepared by SLR consulting Australia.</p>	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	No construction certificates were issued during the Audit Period relating to mechanical plant and equipment, and therefore, this requirement was not triggered during the Audit Period.	Not triggered	
Geotechnical Matters					
D4.	<p>Prior to the issue of any construction certificate, the Applicant must appoint a suitably qualified geotechnical consultant to oversee the excavation and construction works on the site.</p>	<ul style="list-style-type: none"> IEA #2 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	The first construction certificate was issued on 05/01/24 which occurred in the previous Audit Period. This condition was previously assessed, and the Auditors understand that Tetra Tech Coffey Pty Ltd is the appointed suitably qualified consultant for overseeing construction works on the site	Compliant	
D5.	<p>Evidence must be provided to the Certifier that the recommendations of the Geotechnical Assessment prepared by Coffey a Tetra Tech Company and dated 19 February 2021 have been implemented. This includes (but is not limited to):</p> <p>(a) Site excavation;</p>	<ul style="list-style-type: none"> IEA #2 NL221250 Construction Certificate by Northrop 	This condition was previously assessed and therefore, not triggered during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	(b) Site preparation; (c) Foundation design; and (d) Pavement design.	Consulting Engineers Pty Ltd dated 07/12/2023			
Car Parking					
D6.	Prior to the issue of a construction certificate for the driveway/kiss and ride facility, evidence must be submitted to the Certifier that the driveway/kiss and ride facility complies with the following requirements: (a) all exit movements onto Union Street will be restricted to left out only by signage; and (b) a minimum of 7 drop off spaces with a cue length for a further 3 cars are provided in accordance with the current version of AS 2890.1	<ul style="list-style-type: none"> IEA #2 	<p>This condition was previously assessed and therefore, not triggered during the Audit Period.</p> <p>The Auditors note that at the time of Site Inspection, construction of the driveway/kiss and ride facility was ongoing.</p>	Not triggered	
Bicycle Parking and End-of-Trip Facilities					
D7.	Prior to the issue of a 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) the provision of a minimum 53 bicycle parking spaces outlined in plans listed in condition C2; (b) compliance of the layout, design and security of bicycle facilities with the minimum requirements of the latest version of AS 2890.3:2015 <i>Parking facilities - Bicycle parking</i> , and; (c) the provision of end-of-trip facilities for staff.	<ul style="list-style-type: none"> IEA #2 	<p>This condition was previously assessed and therefore, not triggered during the Audit Period.</p>	Not triggered	
Part E – Prior to Commencement of Construction for Stage 1					
Notifications of Commencement					
E1.	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.	<ul style="list-style-type: none"> IEA #1 	<p>Demolition and construction works commenced on 14 September 2023.</p> <p>This condition was previously assessed and therefore, not triggered during the Audit Period.</p>	Not triggered	
E2.	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.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer 	<p>Site personnel correspondence confirmed Stage 1 works are not being completed in stages and as such, this condition was not triggered during the Audit Period.</p>	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
		Passfield, APP, on 30/10/24)			
Certification Drawings					
E3.	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
E4.	Certification is required from a qualified structural engineer that the proposed Union Street Building is capable of remaining safe, serviceable and any damage from mine subsidence shall be limited to 'very slight' damage in accordance with AS2870 (Damage Classification), and readily repairable if subjected to the subsidence parameters provided in Section 6 of the submitted Tetra Tech Coffey, reference: 754-NTLGE282007-01-AI, dated 30 July 2021.	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed and therefore not triggered during the Audit Period.	Not triggered	
E5.	Certification is required from a qualified structural engineer that the Union Street Building can withstand the hydraulic forces of the probable maximum flood (PMF) conditions (flood depth of 2.2 m, flood velocity of 1.8 m/s and velocity-depth product of 1.4 as recommended in Part 5.1.2 of the Newcastle Grammar School Flood Impact Assessment, prepared by Torrent Consulting, Dated 25 March 2022.	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed and therefore not triggered during the Audit Period.	Not triggered	
Subsidence Advisory NSW (SA NSW)					
E6.	The Applicant must obtain SA NSW approval under section 22 of the Coal Mine Subsidence <i>Compensation Act 2017</i> prior to commencement of construction.	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Pre-Construction Dilapidation Report – Protection of Public Interest					
E7.	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;	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<p>(b) prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non-residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected;</p> <p>(c) submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and</p> <p>(d) provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested.</p>				
Pre-construction survey- Adjoining Properties					
E8.	Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of all adjoining residential buildings that are likely to be impacted by the development, including but not limited to impacts from vibration and settlement.	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
E9.	Where the offer for a pre-construction survey is accepted (as required by condition E8), 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	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
E10.	<p>Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by condition E9, the Applicant must:</p> <p>(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;</p> <p>(b) submit a copy of the Pre-Construction Survey Report to the Certifier; and</p> <p>(c) provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.</p>	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Community Communication Strategy					
E11.	No later than two weeks before the commencement of construction, a Community Communication Strategy must be submitted to the Planning Secretary for information. The Community Communication Strategy must provide mechanisms to facilitate communication between the	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<p>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> <ul style="list-style-type: none"> (a) identify people to be consulted during the design and construction phases; (b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; (c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; (d) set out procedures and mechanisms: <ul style="list-style-type: none"> (i) through which the community can discuss or provide feedback to the Applicant; (ii) through which the Applicant will respond to enquiries or feedback from the community; and (iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation. 				
Demolition					
E12.	<p>Prior to the commencement of construction, demolition work plans required by <i>AS 2601-2001 The demolition of structures</i> (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier and Planning Secretary.</p>	<ul style="list-style-type: none"> • IEA #1 	<p>This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	
Ecologically Sustainable Development					

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
E13.	<p>Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either:</p> <p>(a) registering for a minimum 4-star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifier; or</p> <p>(b) seeking approval from the Planning Secretary for an alternative certification process.</p>	<ul style="list-style-type: none"> IEA #1 	<p>This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	
Outdoor Lighting					
E14.	<p>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 <i>AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements</i> and <i>AS 4282-2019 Control of the obtrusive effects of outdoor lighting</i>.</p>	<ul style="list-style-type: none"> IEA #2 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	<p>Site personnel correspondence and review of IEA#2 confirmed that evidence was submitted to the Certifier prior to the Audit Period confirming that outdoor lighting has been designed to comply with AS 1158.3.1:2005 as the design certificate was provided to the certifier, NewCert Pty Ltd, on 28/11/2023 and NewCert Pty Ltd confirmed Condition E14 had been satisfied on 29/11/2023.</p> <p>As such, this condition was not triggered during the Audit Period.</p>	Not triggered	
Environmental Management Plan Requirements					
E15.	<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 (DPIE April 2020).</p> <p><i>Note: The Environmental Management Plan Guideline is available on the Planning Portal at:</i> https://www.planningportal.nsw.gov.au/majorprojects/assessment/post-approval</p> <p><i>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</i></p>	<ul style="list-style-type: none"> 2024 EMP 2023 ACHMSP Letter correspondence Subject: Newcastle Grammar School – Park Campus (SSD-13895306) Revised Construction 	<p>The most recent revision of the 2024 EMP including sub-plans (version 6 dated 05/06/24) received an endorsement from DPPI on 25/06/24.</p> <p>Section 3.0 of the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> (DPIE April 2020) describes the minimum content recommended for an EMP. The minimum content under Section 3.0 of the</p>	Non-compliant	NC1

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
		<p><i>Environmental Management Plan and Specific Sub-Plans, Conditions, C30 and E16</i> by DPHI dated 25/06/24</p> <ul style="list-style-type: none"> • NSW Government Major Projects Portal for SSD-13895306 • Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE, 2020). 	<p>guideline that were not identified in the 2024 EMP included the following:</p> <ul style="list-style-type: none"> • Timing of activities (Section 3.3.4) which states if the EMP covers more than one phase (for example, demolition, construction, operation) the sequence of these phases should be included. <p>Table 2 lists timing of activities for the current construction phase however this does not include the previously completed demolition phase or list the expected timeframes for the operation phase in accordance with the Guideline. Further, the timing of activities for the future construction activities (as part of subsequent stages) has not been included.</p> <ul style="list-style-type: none"> • Legal and compliance requirements (Section 3.5.3) which describes that conditions of consent should be included with a reference to where they have been addressed in the EMP. <p>A description of some of the conditions of consent applicable to the EMP and where they have been addressed was included for the Aboriginal Cultural Heritage Management Sub-Plan, Community Communication Strategy and the Construction Management Plan, however a consolidated list of all relevant consent conditions that relate to the requirements of the entire EMP under the consent (including this condition E15) was not provided.</p>		

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
			<ul style="list-style-type: none"> EMP review and revision process (Section 3.5.17) which states an EMP should be reviewed and, where necessary, revised following: an incident (as defined by the conditions of consent); any non-compliance with the conditions of consent or other legal requirement; any non-conformance with any other environmental requirement; audit findings (internal, external and/or independent); project modifications approved by the consent or approval authority; and, changes to legislative requirement. <p>It is noted that the bottom of each page of the EMP notes "Review date: 05/06/2025", indicating that a review was scheduled for the EMP. However the EMP does not include a section that notes the triggers for review from the Guideline.</p> <p>Recommendation: The Auditors recommend that the 2024 EMP be further revised in accordance with Section 3.0 of the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> (DPIE April 2020). This will allow the future construction activities (as part of subsequent stages) to be undertaken in accordance with a management plan compliant with the guideline.</p>		
Construction Environmental Management Plan					
E16.	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<p>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> <ul style="list-style-type: none"> (i) hours of work; (ii) 24-hour contact details of site manager; (iii) management of dust and odour to protect the amenity of the neighbourhood; (iv) stormwater control and discharge; groundwater management plan including measures to prevent groundwater contamination; (v) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting; (vi) community consultation and complaints handling as set out in the Community Communication Strategy required by condition E11; (vii) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; <p>(b) Construction Traffic and Pedestrian Management Sub-Plan (see condition E18);</p> <p>(c) Construction Noise and Vibration Management Sub-Plan (see condition E19);</p> <p>(d) Construction Soil and Water Management Sub-Plan (see condition E20);</p> <p>(e) Aboriginal Cultural Heritage Management Sub-Plan (see condition E21);</p> <p>(f) Construction Flood Emergency Management Sub-Plan (see condition E22); and</p> <p>(g) an unexpected finds protocol for contamination and associated communications procedure.</p>		<p>September 2023. Therefore, this condition was not triggered during the Audit Period.</p>		
E17.	<p>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.</p>	<ul style="list-style-type: none"> • IEA #1 	<p>This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.</p>	<p>Not triggered</p>	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
E18.	<p>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"> (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council and TfNSW; (c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; and (d) detail heavy vehicle routes, access and parking arrangements. 	<ul style="list-style-type: none"> • IEA #1 	<p>This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	
E19.	<p>The Construction Noise and Vibration Management Sub-Plan (CNVMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced acoustic consultant; (b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); (c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; (d) include strategies that have been developed with the community for managing high noise generating works; (e) describe the community consultation undertaken to develop the strategies in condition (d) above; (f) include a complaints management system that would be implemented for the duration of the construction; and (g) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the management measures in accordance with condition E155. 	<ul style="list-style-type: none"> • IEA #1 	<p>This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
E20.	<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> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'; (c) include an Acid Sulfate Soils Management Plan, including measures for the management, handling, treatment and disposal of acid sulfate soils, including monitoring of water quality at acid sulfate soils treatment areas; (d) 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); (e) detail any off-Site flows from the Site; (f) detail any requirements for offsite disposal of soil and the importation of fill. (g) measures to minimise any groundwater ingress; (h) detail any required dewatering of the Site; and (i) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to, 1 in 5-year ARI and 1 in 100-year ARI. 	<ul style="list-style-type: none"> • IEA #1 	<p>This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	
E21.	<p>The Aboriginal Cultural Heritage Management Sub-Plan (ACHMSP) must address, but not be limited to, the following</p> <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced expert in consultation with the Registered Aboriginal Parties; (b) be submitted to the satisfaction of the Planning Secretary prior to construction of any part of the development; (c) details of an archaeological test and salvage excavation program to occur post-project approval but implemented before natural soil layers are disturbed; 	<ul style="list-style-type: none"> • IEA #1 	<p>This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	(d) protocols for unexpected finds and human remains; (e) on-site inductions and interpretation as described in recommendation 2 of the Aboriginal Cultural Heritage Assessment Report prepared by Heritage Now dated 6 October 2021; and (f) management of archaeological resources.				
E22.	The Construction Flood Emergency Management Sub-Plan (FEMSP) must address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced person(s); (b) address the provisions of the Floodplain Risk Management Guidelines (EHG); (c) include details of: (i) the flood emergency responses the construction phases of the development; (ii) predicted flood levels; (iii) flood warning time and flood notification; (iv) assembly points and evacuation routes; (v) evacuation and refuge protocols; and (vi) awareness training for employees and contractors, and students.	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
E23.	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.	<ul style="list-style-type: none"> Driver Code of Conduct by NGS dated 11/09/23 Site Personnel Correspondence (Joshua Smith, CPG, on 18/12/24) Subcontractor Information Package #SIP-31 by CPG dated 21/06/24) 	The Driver Code of Conduct was viewed by the Auditors and is considered to satisfy the requirements of this condition. Site personnel correspondence confirmed that the Driver Code of Conduct is communicated to workers through Subcontractor Information Packages sent out to all trades prior to starting on site, through Daily Briefings uploaded to Sign-on Site (the sites productivity, date and safety platform), via the induction presentation where those relevant subcontractors are required to acknowledge the code of conduct and via the site notice board. The Auditors viewed an example of the subcontractor information package, a daily briefing record and viewed the	Compliant	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
		<ul style="list-style-type: none"> Daily briefing example for the date 10/10/24 Site inspection (30/1024) 	notice board at the time of site inspection to confirm this.		
Soil and Water					
E24.	Prior to the commencement of construction, the applicant must install erosion and sediment controls and other soil and water management measures in accordance with the CSWMSP.	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period. At the time of site inspection, the implementation of erosion and sediment controls was observed.	Not triggered	
Flood Management					
E25.	Prior to the commencement of construction, the Applicant must prepare and implement for the duration of construction: (a) flood warning and notification procedures for construction workers on site; and (b) evacuation and refuge protocols.	<ul style="list-style-type: none"> CPG10170 Emergency Evacuation record dated 05/09/2024 Construction Flood Emergency Plan by CPG dated 16/10/23 	Evidence for the implementation of the flood warning procedure was viewed as an example record for an emergency evacuation dated 05/09/2024. This record demonstrated compliance with the Construction Flood Emergency Plan.	Compliant	
E26.	Prior to the commencement of construction, the Certifier must be satisfied that all floor levels would be constructed to a height no lower than the flood planning level of 3.55m AHD plus 500mm of freeboard	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
E27.	Prior to the commencement of construction, the Certifier must be satisfied that any structures below the flood planning level of 3.55m AHD plus 500mm of freeboard would be constructed from flood compatible building components	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Construction Worker Transportation Strategy					
E28.	Prior to the commencement of 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.	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Site Contamination					
E29.	Prior to the commencement of construction, the Applicant must demonstrate to the satisfaction of the Planning Secretary that: <ul style="list-style-type: none"> (a) an NSW EPA-accredited Site Auditor be engaged to provide advice throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed. (b) the final material used for improving mine void stability and the geotechnical characteristics of the site would be long term stable and non-polluting or is subject to a resource recovery order or resource recovery exemption made under clauses 91 and 92 of the Protection of the Environment Operations (Waste) Regulation 2014. (c) the adopted remediation strategy would not result in the pollution of land or waters, or cause harm to the environment. (d) that any relevant approvals or authorisations required under the Protection of the Environment Operations Act 1997 and any other relevant legislation have been obtained. 	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Development Contributions					
E30.	Prior to commencement of construction for any part of the approved development, development contributions must be paid in accordance	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14	Not triggered	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	with the City of Newcastle Section 7.12 Development Contributions Plan.		September 2023. Therefore, this condition was not triggered during the Audit Period.		
Landscaping					
E31.	Prior to the commencement of construction, the Applicant must prepare a revised Landscape Plan to manage the revegetation and landscaping works on-site. The plan must: (a) Provide only three street trees in Corlette Street to provide sufficient spacing as per City of Newcastle's Street Tree Selection Manual 2016. Cupaniopsis anarcardioides (Tuckeroo) trees must be used for street trees instead of the originally proposed Melaleuca quinquenervia.	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Hunter Water					
E32.	Prior to the commencement of construction for any part of the approved development, a Section 50 Certificate under the Hunter Water Act 1991 must be obtained from Hunter Water for the proposed development.	<ul style="list-style-type: none"> IEA #1 	This condition was previously assessed as construction works commenced on 14 September 2023. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Road Works					
E33.	A separate application must be lodged, and consent obtained from Newcastle City Council for all works within the road reserve pursuant to Section 138 of the Roads Act 1993 (NSW), or other satisfactory arrangements confirmed in writing, from Council before the issue of any Construction Certificate.	<ul style="list-style-type: none"> IEA #2 	This condition was previously assessed as approval from Council for the Section 138 application was received on 20/12/2023. Therefore, this condition was not triggered during the Audit Period. At the time of site inspection, works were ongoing.	Not triggered	
Part F – During Construction for Stage 1					
Site Notice					
F1.	A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purposes of informing the public of project details and must satisfy the following requirements:	<ul style="list-style-type: none"> Site inspection 30/10/2024 	Site notices were observed by the Auditors to be displayed along the site fenceline for the Union and Corlette Street entrances. The sub-requirements of this condition were met during the Audit Period as follows:	Compliant	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<p>(a) minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size;</p> <p>(b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period;</p> <p>(c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and</p> <p>(d) the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted.</p>		<p>(a) Site notices observed were considered to be a minimum page layout size of A1;</p> <p>(b) Site notices were considered to be of durable and weatherproof material;</p> <p>(c) The details required to be displayed were observed at the site inspection;</p> <p>(d) The site notice was displayed at eye level on the perimeter hoardings/fencing and included that unauthorised entry to the site is not permitted.</p>		
Operation of Plant and Equipment					
F2.	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.	<ul style="list-style-type: none"> Inspection record titled <i>Inspection: CPG0255 Plant Safety Verification Report V7 #79</i> by CPG dated 30/05/2024 	Evidence of proper and efficient maintenance and operation of construction plant and equipment was viewed as an example inspection record for a 250 tonne slew wheeler crane. The inspection record included but was not limited to the verification of plant registration, guards/safety devices, certification, warning devices, operator ticket/licence , SWMS/JSAs required, service records, noise suppression devices, and working load limits.	Compliant	
Demolition					
F3.	Demolition work must comply with the demolition work plans required by Australian Standard AS 2601-2001 The demolition of structures and endorsed by a suitably qualified person as required by condition E12.	<ul style="list-style-type: none"> IEA #1 IEA #2 Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	No demolition works were undertaken during the Audit Period. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
Construction Hours					
F4.	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 6pm, Mondays to Fridays inclusive; and (b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays.	<ul style="list-style-type: none"> Daily site briefing records dated 16/10/24 and 23/10/24 	Evidence of construction being limited to the hours specified in Condition F4 was viewed as example records of Daily Site Briefings. Both daily site briefing records described that construction hours are to be adhered to.	Compliant	
F5.	Construction activities may be undertaken outside of the hours in condition F4 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 the works are inaudible at the nearest sensitive receivers; or (d) where a variation is approved in advance in writing by the Planning Secretary or his nominee if appropriate justification is provided for the works.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) Newcastle Grammar School Construction Noise and Vibration Management Plan by RCA Australia Pty Ltd dated 12/02/2024 (the '2024 CNVMP') 	Site personnel correspondence confirmed that no works were required outside of the hours listed in Condition F4 during the Audit Period. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
F6.	Notification of such construction activities as referenced in condition F5 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.		Refer to response to Condition F5.	Not triggered	
F7.	Unless otherwise approved in the Construction Noise and Vibration Management Sub-Plan (Condition E19) through the use of alternative low-noise construction methods, continuous noise or vibration resulting from 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.	<ul style="list-style-type: none"> Site personnel correspondence (Joshua Smith, 18/12/24) 	Site personnel correspondence confirmed that no rock breaking, rock hammering, sheet piling, pile driving, or similar activities were undertaken during the Audit Period. Therefore, this condition was not triggered during the Audit Period.	Compliant	
Implementation of Management Plans					

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
F8.	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	<ul style="list-style-type: none"> This Audit Table 2024 EMP (inclusive of sub-plans) Complaints register Incidents register 	<p>The Applicant is generally carrying out the development in accordance with the 2024 EMP inclusive of sub-plans as:</p> <ul style="list-style-type: none"> they have been developed in accordance with the conditions of consent; and there have been no complaints or incidents identified for the Audit Period resulting from the implementation of the 2024 EMP. 	Compliant	
Construction Traffic					
F9.	All construction vehicles are to be contained wholly within the site, except if located in a City of Newcastle Council, approved on-street work zone and vehicles must enter the site or an approved on-street work zone before stopping.	<ul style="list-style-type: none"> Site inspection 30/10/2024 	At time of site inspection, all construction vehicles were observed to be wholly contained within the site, with the exception of the Section 138 works occurring within Union Street with Council approval (refer to Condition E33).	Compliant	
Hoarding Requirements					
F10.	The following hoarding requirements shall 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.	<ul style="list-style-type: none"> Site inspection 30/10/24 Site personnel correspondence (Joshua Smith. CPG, on 30/10/24) Photograph provided by site personnel (Joshua Smith, CPG, on 30/10/24) 	<p>The requirements of this condition have been met during the Audit Period as follows:</p> <p>(a) At the time of site inspections, the Auditors observed no third-party advertising displayed on hoarding/fencing;</p> <p>(b) Site personnel correspondence confirmed that the site hoarding/fencing has been graffitied and provided a photo of graffiti event. The Auditors confirmed that no graffiti was evident at time of site inspection.</p>	Compliant	
No Obstruction of Public Way					
F11.	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.	<ul style="list-style-type: none"> Site inspection 30/10/24 	At the time of site inspection, the Auditors did not observe any materials, vehicles, refuse, skips or the likes obstructing the public way.	Compliant	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
Construction Noise Limits					
F12.	The development must be constructed to achieve the construction noise management levels detailed in <i>the Interim Construction Noise Guideline</i> (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan	<ul style="list-style-type: none"> 2024 CNVMP Site inspection 30/10/24 Daily site briefing records dated 16/10/24 and 23/10/24 Complaints register 	<p>The 2024 CNVMP lists the mitigation measures to be adopted for the project including: noise and vibration letterbox drops; use of quieter and less noise/vibration emitting construction methods; use of non-beeper reverse alarms; dedicated loading/unloading areas to be shielded; additional noise minimising fittings to equipment; environmental noise induction; and complaint management.</p> <p>The Auditors viewed two example daily site briefings which included reference to construction hours and the requirements to adhere to all noise restrictions. The Auditors also viewed an example pre-start equipment checklist that included a check of whether "Appropriate noise suppression device (eg/muffler) is fitted & operational".</p> <p>For the reasons above in addition to the lack of any noise complaints from nearby residents during the Audit Period, this condition is considered compliant.</p>	Compliant	
F13.	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition F4.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	Site personnel correspondence confirmed that no works were required outside of the hours listed in Condition F4 during the Audit Period. Therefore, this condition was not triggered during the Audit Period.	Compliant	
F14.	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.	<ul style="list-style-type: none"> Site inspection 30/10/24 	At time of site inspection, use of non-beeper reserve alarms were observed.	Compliant	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
Vibration Criteria					
F15.	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).	<ul style="list-style-type: none"> Complaints register Site personnel correspondence (Joshua Smith, on CPG, 18/12/24) 	<p>Site personnel correspondence confirmed that no vibratory compactors, or other vibration-intensive works occurred during the Audit Period.</p> <p>Further, as no vibration-related complaints were received during the Audit Period, the Auditors have no reason to believe the human exposure criteria were exceeded for the Audit Period.</p>	Compliant	
F16.	Vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition F15.		Refer to response to Condition F15.	Compliant	
F17.	The limits in conditions F15 and F16 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition E199 of this consent.		Refer to response to Condition F15.	Compliant	
Trees Approved for Removal					
F18.	Tree removal must be limited to trees numbered 1-33 and 52 as identified in the Arborist Report, prepared by Abacus Tree Services and dated 21 June 2021.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	<p>Site personnel correspondence confirmed that no trees were removed during the Audit Period. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	
Tree Protection					
F19.	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 trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the Arborist Report, prepared by Abacus Tree Services and dated 21 June 2021; and	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) Site inspection 30/10/24 Arborist Report by Abacus Tree 	<p>The requirements of this condition were met during the Audit Period as follows:</p> <ul style="list-style-type: none"> Site personnel correspondence confirmed that no trees were removed or trimmed during the Audit Period. Therefore, this sub-requirement was not triggered during the Audit Period. At time of site inspection, all trees located within the work zone were suitably 	Compliant	

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	<p>(c) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.</p>	<p>Services dated 21/06/21</p> <ul style="list-style-type: none"> Letter correspondence Subject: <i>Warning Letter – Breach of Section 4.21(1) of the Environmental Planning and Assessment Act 1979</i> by DPHI dated 24/09/2024 	<p>protected in a designated Tree Protection Zone</p> <ul style="list-style-type: none"> Site personnel correspondence confirmed that no access was required to the Tree Protection Zone during the Audit Period. Therefore, this sub-requirement was not triggered during the Audit Period. <p>The Auditors note that the Applicant received a warning letter from DPHI in relation to this condition on 24/09/24. The warning letter was in response to an inspection undertaken by a DPHI officer on 15/01/24 whereby it was observed by the DPHI officer that the Applicant had failed to implement tree protection during construction activities at the time of inspection. This matter falls outside of the Audit Period, however, at the time of audit site inspection, the Auditors noted tree protection available on all trees within the Tree Protection Zone.</p> <p>Observation: the 2024 EMP does not reference the Arborist Report dated 2021 nor reference requirements for tree protection. It is recommended the 2024 EMP be updated to clearly detail the requirements of tree protection measures in accordance with the Arborist Report dated 2021.</p>		
Air Quality					
F20.	<p>The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.</p>	<ul style="list-style-type: none"> Site inspection 30/10/24 Complaints register 	<p>At the time of site inspection, it was confirmed that dust management measures included the internal access road being hard stand and a sprinkler system available for dust suppression.</p>	Compliant	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
			For the reasons above in addition to the lack of any dust complaints from nearby residents during the Audit Period, this condition is considered compliant.		
F21.	<p>During the construction period, the Applicant must ensure that:</p> <ul style="list-style-type: none"> (a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (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. 	<ul style="list-style-type: none"> • Site inspection 30/10/24 • Site personnel correspondence (Joshua Smith, CPG, on 18/12/24) 	<p>The requirements of this condition have been met during the Audit Period as follows:</p> <ul style="list-style-type: none"> (a) Refer to response to condition F20. (b) Site personnel correspondence confirmed that all truck loads are covered prior to leaving the site. (c) Site personnel correspondence confirmed that traffic controllers and construction workers regularly sweep near access points to promptly remove debris. These actions are also initiated through regular Health, Safety, and Environment Checklist's, which prompts management to inspect both the site access road and public roads periodically. (d) As per response to (c). The Auditors note that the adjacent streets were all observed to be clean at time of site inspection. (e) The access road was stabilised at the start of construction via application of a tack coat to minimise dust generation from construction traffic. At the time of site inspection, earthworks were completed, and land was vegetated or hardstand. <p>No truck movements were observed by the Auditors at the time of site inspection due to Section 138 works being completed on Union Street.</p>	Compliant	
Erosion and Sediment Control					

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
F22.	All erosion and sediment control measures must be effectively implemented and maintained in accordance with the CSWMSP.	<ul style="list-style-type: none"> Site inspection 30/10/24 2023 CSWMSP 	The Auditors observed implementation of erosion and sediment controls consistent with the 2023 CSWMP at time of site inspection. Controls included (but not limited to): perimeter coir logs, silt fence, and the hard stand access road.	Compliant	
Imported Fill					
F23.	The Applicant must: <ul style="list-style-type: none"> (a) ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Certifier upon request. 	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	Site personnel correspondence confirmed that no material was brought onto the site during the Audit Period. Therefore, this requirement was not triggered.	Not triggered	
Disposal of Seepage and Stormwater					
F24.	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.		The site was connected to the stormwater system for the duration of the Audit Period. Therefore, this requirement was not triggered.	Not triggered	
Emergency Management					
F25.	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.	<ul style="list-style-type: none"> Site inspection 30/10/24 	The site induction included the location of assembly points and evacuation routes. An emergency evacuation plan was observed by the Auditors at the site noticeboard in the construction site at time of site inspection.	Compliant	
Aboriginal Cultural Heritage					
F26.	Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by Heritage Now dated 06/10/2021 and the approved ACHMSP under condition E21.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	Works are considered to be undertaken in accordance with the 2023 ACHMSP for the Audit Period. Site personnel confirmed that no unexpected finds have been encountered for the Audit Period.	Compliant	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
		<ul style="list-style-type: none"> 2023 ACHMSP 			
Waste and Storage Processing					
F27.	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.	<ul style="list-style-type: none"> Site inspection 30/10/24 2024 EMP inclusive of the Waste Management Plan by SLR Consulting Pty Ltd dated October 2021 (the '2021 WMP') 	The designated waste storage area was viewed at time of site inspection. The Auditors note that no wastes were observed outside of the designated waste storage area of the site.	Compliant	
F28.	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	<ul style="list-style-type: none"> 2024 EMP inclusive of 2021 WMP Resource Recovery Report by Central Waste Station Pty Ltd for the months: <ul style="list-style-type: none"> May 2024 June 2024 July 2024 August 2024 September 2024 October 2024 	Construction waste generation at the site can include metals, concrete, masonry/tiles, timber, glazing, plasterboard and other (plastics, paints, paper, cardboard). Waste collection is engaged both through private and City of Newcastle for general wastes. Review of the monthly Resource Recovery Reports by Central Waste Station Pty Ltd for the months May 2024 through to October 2024 indicates that scrap metal, cardboard, timber, green waste, concrete bricks were sent to resource recovery facilities for the Audit Period.	Compliant	
F29.	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.	<ul style="list-style-type: none"> 2024 EMP inclusive of 2021 WMP Resource Recovery Report by Central Waste 	Review of the monthly Resource Recovery Reports by Central Waste Station Pty Ltd for the months May 2024 through to October 2024 indicates that concrete bricks resource recovery facilities for the Audit Period.	Compliant	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
		Station Pty Ltd for the months: May 2024 June 2024 July 2024 August 2024 September 2024 <ul style="list-style-type: none"> • October 2024 • Site personnel correspondence (Joshua Smith, CPG, on 18/12/24) 	Site personnel correspondence confirmed that excess concrete gets returned via the concrete agitator truck and not disposed onsite. When a concrete pump is required on-site and must 'wash-out' the site has a concrete collection tray to collect the washout water and concrete waste which is then disposed of through Central Waste Station waste collection.		
F30.	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.	<ul style="list-style-type: none"> • 2024 EMP inclusive of 2021 WMP • Resource Recovery Report by Central Waste Station Pty Ltd for the months: May 2024 June 2024 July 2024 August 2024 September 2024 October 2024 	The monthly waste records include a breakdown of the total waste amount received, the total amount of waste that was able to be recovered, and the total amount of waste that was unable not be recovered/recycled.	Compliant	
F31.	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.	<ul style="list-style-type: none"> • 2024 EMP inclusive of 2021 WMP • Site personnel correspondence (Jennifer 	Site personnel correspondence confirmed that no hazardous materials were encountered that required disposal during the Audit Period. Therefore, this requirement was not triggered.	Not triggered	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
		Passfield, APP, on 30/10/24)			
Outdoor Lighting					
F32.	The Applicant must ensure that all external lighting is constructed and maintained in accordance with <i>AS 4282-2019 Control of the obtrusive effects of outdoor lighting</i> .	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	No outdoor lighting has been installed during the Audit Period. Therefore, this requirement is not triggered.	Not triggered	
Floor Levels					
F33.	<p>Certification is to be prepared by a Registered Surveyor and submitted to the Certifier confirming that:</p> <p>(a) On completion of ground floor construction, confirming that the floor levels are in accordance with the approved levels.</p> <p>(b) On completion of each subsequent floor level, confirming that the floor levels are in accordance with the approved levels.</p>	<ul style="list-style-type: none"> Email correspondence subject <i>NGS Park Campus SSD 13895306 F33 Second Level</i> from Joshua Smith of CPG dated 02/07/24 Email correspondence subject <i>NGS Park Campus SSD 13895306 F33 Roof Level</i> from Joshua Smith of CPG dated 13/08/24 	Review of email correspondence from site personnel confirmed that certification from a registered surveyor was provided to the Certifier for floor level 2 (L02) and floor level 3 (L03) during the Audit Period.	Compliant	
Site Contamination					
F34.	Remediation of the site must be carried out in accordance with the Remediation Action Plan prepared by Tetra Tech Coffey and dated 13 October 2021 and any variations to the Remedial Action Plan approved by an NSW EPA-accredited Site Auditor or the unexpected find protocol	<ul style="list-style-type: none"> Remediation Action Plan (RAP) Newcastle Grammar School 	Works are considered to be carried out in accordance with the Remediation Action Plan prepared by Tetra Tech Coffey and dated 13 October 2021.	Compliant	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	prepared in accordance with condition Error! Reference source not found (sic)..	– Park Campus: 127 Union Street, Cooks Hill NSW by Tera Tech Coffey dated 13/10/21			
F35.	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)		Refer to response to Condition C9.	Not triggered	
F36.	The Applicant must ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site that would result in significant contamination.		Noted. The Auditors are not aware of any activities undertaken during the Audit Period that would result in a change of risk in relation to any pre-existing contamination on the site that would result in a significant contamination.	Not triggered	
Independent Environmental Audit					
F37.	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	<ul style="list-style-type: none"> IEA #1 IEA #2 This Audit table 	This Audit (IEA#3) has been undertaken in accordance with the requirements of this condition in addition to the Independent Audit Post Approval Requirements (2020).	Compliant	
F38.	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.	<ul style="list-style-type: none"> Letter correspondence subject <i>Newcastle Grammar School – Park Campus – IEA Auditor Proposal</i> from DPHI dated 10/10/24 	The Audit team proposed to undertake this Audit (IEA#3) received endorsement from DPHI on the 10 October 2024.	Compliant	
F39.	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (2020), upon giving at least 4 week’s notice (or timing) to the applicant of the date or timing upon which the audit must be commenced.		Noted. The Auditors are not aware of any directions from the Planning Secretary of this nature.	Not triggered	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
F40.	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must:</p> <p>(a) review and respond to each Independent Audit Report prepared under condition F37 of this consent;</p> <p>(b) submit the response to the Planning Secretary and the Certifier; and</p> <p>(c) make each Independent Audit Report and response to it publicly available within 60 days of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.</p>	<ul style="list-style-type: none"> This Audit table IEA #2 NSW Government Major Projects Portal for SSD-13895306 Email correspondence subject: <i>FW: Newcastle Grammar School – Park Campus – Post Approval Document Received – (SSD-13895306-PA-25)</i> from DPHI and dated 04/07/24. 	<p>The requirements under this condition were met during the Audit Period for the previous IEA (IEA#2) as follows:</p> <p>(a) The audit findings associated with IEA#2 did not include any non-compliances, observations or recommendations.</p> <p>(b) As per point (a) above, as the findings of IEA#2 did not include any non-compliances, observations or recommendations, the Applicant did not submit a response to IEA#2.</p> <p>(c) The Auditors were able to access IEA#2 on the Major Projects Planning Portal. Evidence of submission to the Planning Secretary was viewed by the Auditors as the copy of the email correspondence receipt documenting the submission of IEA#2 to DPHI via the Major Projects Planning Portal.</p>	Compliant	
F41.	<p>Independent Audit Reports and the Applicant’s response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.</p>	<ul style="list-style-type: none"> Site inspection 30/10/24 Email correspondence subject: <i>FW: Newcastle Grammar School – Park Campus – Post Approval Document Received – (SSD-13895306-PA-25)</i> from DPHI and dated 04/07/24. 	<p>The previous IEA (IEA#2) was submitted to the Planning Portal within the required timing specified in this condition as evidenced by email correspondence receipt documenting the submission of IEA#2 to DPHI via the Major Projects Planning Portal.</p> <p>IEA#2 did not include any non-compliances, observations or recommendations to trigger an Applicant response to audit findings.</p> <p>For this audit (IEA#3), The site inspection occurred on the 30 October 2024 and under the requirements of this condition, the Independent Audit Reports and the Applicant’s response to</p>	Compliant	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
			audit findings must be submitted to the Planning Secretary by the 30 December 2024.		
F42.	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.		Noted. The Auditors are not aware of any requests from the Planning Secretary for the ongoing independent operational audits to be ceased.	Not triggered	
Part G – Prior to the issue of occupation certification/ commencement of Operation for Stage 1					
Notification of Occupation					
G1	At least one month before the issue of the occupation certificate, the date of commencement of the operation of the development must be notified to the Planning Secretary in writing. If the operation of the development is to be staged, the Planning Secretary must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	<ul style="list-style-type: none"> Site personnel correspondence (Jennifer Passfield, APP, on 30/10/24) 	<p>No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.</p> <p>Site personnel correspondence advised the anticipated timing for issuing of the occupation certificate will be December 2024.</p>	Not triggered	
External Walls and Cladding					
G2	Prior to the issue of the occupation certificate, the Applicant must provide the Certifier with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
G3	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.		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Post-Construction Dilapidation Report – Protection of Public Infrastructure					
G4.	Prior to the issue of an occupation certificate, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must:		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<p>(a) ascertain whether the construction works created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition E7 of this consent;</p> <p>(b) have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads).</p> <p>(c) be submitted to the Certifier;</p> <p>(d) be forwarded to Council for information; and</p> <p>(e) be provided to the Planning Secretary when requested.</p>				
Repair of Public Infrastructure					
G5.	<p>Unless the Applicant and the relevant public authority agree otherwise, the Applicant must:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the construction works; and/or</p> <p>(b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development; and/or</p> <p>(c) pay compensation for the damage as agreed with the owner of the public infrastructure.</p> <p><i>Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions of this consent.</i></p>		<p>Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	
Road Damage					
G6.	<p>Prior to the issue of an occupation certificate, the cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Subject Site as a result of construction works associated with the approved development must be met in full by the Applicant.</p>		<p>No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	
Post-Construction Survey – Adjoining Properties					
G7.	<p>Where a pre-construction survey has been undertaken in accordance with condition E8, prior to the commencement of operation the</p>		<p>Operations did not commence during the Audit Period as all works were limited to construction.</p>	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<p>Applicant must engage a suitably qualified and experienced expert to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must:</p> <ul style="list-style-type: none"> (a) document the results of the post-construction survey and compare it with the pre-construction survey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition E9; (b) be provided to the owner of the relevant buildings surveyed; (c) be provided to the Certifier; and (d) be provided to the Planning Secretary when requested. 		Therefore, this condition was not triggered during the Audit Period.		
G8.	<p>Where the Post-Construction Survey Report determines that damage to the identified property occurred as a result of the construction works, the Applicant shall repair, or meet the full costs associated with repairing the damaged buildings, within an agreed timeline between the owner of the identified property and the Planning Secretary. Alternatively, the Applicant may pay compensation for the damage as agreed with the property owner.</p>		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Works as Executed Plans					
G9.	<p>Prior to the issue of the occupation certificate, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifier.</p>		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Operational Transport, and Pedestrian Management Plan (OTPMP)					
G10.	<p>Prior to the issue of the occupation certificate for Stage 1, an OTPMP must be prepared by a suitably qualified person, in consultation with Council, and submitted to the satisfaction of the Certifier, with a copy submitted to Council for information. The OTPMP must address the following:</p> <ul style="list-style-type: none"> (a) detailed pedestrian analysis including the identification of safe route options to identify the need for management measures such as staggered school start and finish times to ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish; 		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<p>(b) the location and operational management procedures of the drop-off and pick-up parking, including staff management/traffic controller arrangements;</p> <p>(c) the location and operational management procedures for the drop-off and pick-up of students by buses and coaches including staff management/traffic controller arrangements;</p> <p>(d) closure of the drop-off and pick-up driveway outside of the drop-off and pick-up times.</p> <p>(e) delivery and services vehicle and bus access and management arrangements;</p> <p>(f) potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing drop-off and pick-up zones;</p> <p>(g) a monitoring and review program.</p>				
Mechanical Ventilation					
G11.	<p>Prior to the issue of the occupation certificate, the Applicant must provide evidence to the satisfaction of the Certifier that the installation and performance of the mechanical ventilation systems complies with:</p> <p>(a) <i>AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings</i> and other relevant codes; and</p> <p>(b) any dispensation granted by Fire and Rescue NSW.</p>		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Operational Noise – Design of Mechanical Plant and Equipment					
G12.	<p>Prior to the issue of an occupation certificate, the Applicant must submit evidence to the Certifier that the noise mitigation recommendations in the assessment undertaken under condition D3 have been incorporated into the design of mechanical plant and equipment to ensure the development will not exceed the project noise trigger levels as identified in the Noise Impact Assessment dated 12 October 2021 and prepared by SLR consulting.</p>		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
Service Vehicles and Bicycle parking Arrangements					
G13.	<p>Prior to the issue of an occupation certificate or other timeframe agreed in writing by the Planning Secretary, evidence must be submitted to the satisfaction of the Planning Secretary that demonstrates that:</p> <ul style="list-style-type: none"> (a) bicycle parking facilities comply with condition D8; (b) appropriate pedestrian and cyclist advisory signs are to be provided; (c) all works/regulatory signposting associated with the proposed developments have been undertaken at no cost to the relevant roads authority; (d) the bicycle parking spaces are located in easy to access, well-lit areas that incorporate passive surveillance; and (e) end-of-trip facilities for staff are provided. 		<p>No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	
Fire Safety Certification					
G14.	<p>Prior to the issue of an occupation certificate, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety Certificate must be submitted to the relevant authority and Council. The Fire Safety Certificate must be prominently displayed in the building.</p>		<p>No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	
Structural Inspection Certificate					
G15.	<p>Prior to the issue of an occupation certificate of the relevant parts of any new or refurbished buildings, a Structural Inspection Certificate or a Compliance Certificate must be submitted to the satisfaction of the Certifier. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the approval authority and the Council after:</p> <ul style="list-style-type: none"> (a) the site has been periodically inspected and the Certifier is satisfied that the structural works is deemed to comply with the final design drawings; and (b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s. 		<p>No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.</p>	Not triggered	
Stormwater Quality Management Plan					

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
G16.	<p>Prior to the issue of the occupation certificate, an Operation and Maintenance Plan (OMP) is to be submitted to the satisfaction of the Certifier along with evidence of compliance with the OMP. The OMP must ensure the proposed stormwater quality measures remain effective and contain the following:</p> <ul style="list-style-type: none"> (a) maintenance schedule of all stormwater quality treatment devices; (b) record and reporting details; (c) relevant contact information; and (d) Work Health and Safety requirements. 		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Warm Water Systems and Cooling Systems					
G17.	<p>The installation of warm water systems and water cooling systems (as defined under the <i>Public Health Act 2010</i>) must comply with the <i>Public Health Act 2010</i>, <i>Public Health Regulation 2012</i> and Part 1 (or Part 3 if a Performance-based water cooling system) of <i>AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance</i> and the NSW Health Code of Practice for the Control of Legionnaires' Disease.</p>		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Outdoor Lighting					
G18.	<p>Prior to the issue of the occupation certificate, the Applicant must submit evidence from a suitably qualified practitioner to the Certifier that demonstrates that installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers and:</p> <ul style="list-style-type: none"> (a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and (b) has been mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. 		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

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Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
Signage					
G19.	Prior to the issue of an occupation certificate, way-finding signage and signage identifying the location of the kiss and ride facility must be installed.		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
G20.	Prior to the issue of an occupation certificate, bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas.		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
G21.	Prior to the issue of an occupation certificate a 'Left Turn Only' (R2-1A) sign must be installed within the site adjacent the exit driveway.		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Site Contamination					
G22.	<p>Prior to the occupation certificate, the Applicant must submit a Validation Report for the development to the Certifier. The Validation Report must:</p> <ul style="list-style-type: none"> (a) be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme; (b) be prepared in accordance with the relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997; (c) include, but not be limited to: <ul style="list-style-type: none"> (i) comment on the extent and nature of the remediation undertaken; (ii) if material is to remain in-situ and capped, describe the location, nature and extent of any remaining contamination on site as well as any ongoing management requirements; 		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<ul style="list-style-type: none"> (iii) sampling and analysis plan and sampling methodology undertaken as part of the remediation; (iv) if treated material is to remain on the subject site, results of sampling of treated material, compared with the treatment criteria in the most updated RAP; (v) results of any validation sampling, compared to relevant guidelines/criteria; (vi) comment on the suitability of the area for the intended land use; and <p>(d) be submitted to the Planning Secretary for information.</p>				
G23.	Prior to issue of an occupation certificate, the Applicant must obtain confirmation from the Certifier in writing that the requirements of condition G22 have been met.		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
G24.	Where changes are made to the Remediation Action Plan prepared by Tetra Tech Coffey and dated 13 October 2021 under condition F34, prior to the commencement of operation, the Applicant must submit a Section A1 Site Audit Statement or a Section A2 Site Audit Statement accompanied by an Environmental Management Plan prepared by a NSW EPA accredited Site Auditor. The Section A1 or A2 Site Audit Statement must verify the relevant part of the site is suitable for the intended land use and be provided, along with any Environmental Management Plan to the Planning Secretary and the Certifier.		The Auditors are not aware of any changes made to the Remedial Action Plan prepared by Tetra Tech Coffey and dated 13 October 2021 under condition F34. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Landscaping					
G25.	Prior to the issue of an occupation certificate, landscaping of the site must be completed in accordance with landscape plans approved under condition E31.		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Operational Flood Emergency Management Plan					
G26.	Prior the commencement of the operation, a revised Flood Emergency Management Plan must be submitted to the satisfaction of Planning Secretary that		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<p>(a) has been prepared by a suitably qualified and experienced person(s);</p> <p>(b) incorporates the following changes:</p> <ul style="list-style-type: none"> (i) Update sections 2.2.1 and 2.2. to reflect the flood levels and hydraulic hazard in the 1% AEP flood in post-development condition as modelled in the Flood Impact Assessment, prepared by Torrent Consulting, dated 25 March 2022. (ii) Update the timeline analysis in Section 3.3 and Appendix D to account for the potential 5-minute lag between trigger levels being reached and Early Warning Network (EWN) issuing a Flood Warning. (iii) Note that the school must subscribe to both EWN and the BoM services and ensure both are available and set up to deliver notifications on the devices of the Chief Warden and all other Wardens. The triggers should be monitored twice daily during normal operations. (iv) Modify the plan so that during normal operation the Chief Warden or delegate must twice daily monitor the BoM and EWN for triggers of the Alert Modes, once in the morning before school operational hours and once more in the evening. (v) Modify the emergency response on an Amber Alert including: <ul style="list-style-type: none"> ▪ Do not rely entirely on a message from EWN to move to a red alert, as this might not be sent or received due to technical issues. Add a visual back-up trigger (i.e. the sight of ankle deep flooding in Union Street). ▪ The school must communicate to all parents and carers that local roads around the site may flood, and that driving or walking through floodwaters of any depth is a severe risk to life; ▪ Note that evacuation of the site via bus or by any other means, as this may expose students or staff to a higher risk; 				

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<ul style="list-style-type: none"> ▪ Remove evacuation of vulnerable site occupants as it is considered a safer option to shelter in place; and ▪ Remove the closure of kiss and ride area. (vi) Modify the emergency response on a Red Alert including: <ul style="list-style-type: none"> ▪ All school children and staff within Block B must evacuate vertically to the upper levels of that building; and ▪ Require that any children and staff that have not already evacuated from Block A (Sandy Warren Performance Centre) to the Union Street Building under an amber alert, evacuate to the first floor of Block B as there is more available time. 				
Part H – Post Occupation					
Staff and student numbers					
H1.	Upon the issuance of the final occupation certificate for the Stage 1 development, the number of students permitted at the school onsite at any one time must not exceed 480. Notwithstanding, the maximum student population may exceed 480 by up to a maximum 10 additional students from time to time, to allow for unanticipated fluctuations on a temporary basis.		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
H2.	Upon the issuance of the final occupation certificate for this development the number of full-time equivalent staff at the school onsite at any one time must not exceed 50.		No occupation certificate was issued during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Operation of Plant and Equipment					
H3.	All plant and equipment used on site must be maintained in a proper and efficient condition operated in a proper and efficient manner.		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Warm Water Systems and Cooling Systems					
H4.	The operation and maintenance of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must		Operations did not commence during the Audit Period as all works were limited to construction.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 2 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires’ Disease.		Therefore, this condition was not triggered during the Audit Period.		
Community Communication Strategy					
H5.	The Community Communication Strategy, as approved by the Planning Secretary, must be implemented for a minimum of 12 months following the completion of construction		Construction was not completed during the Audit Period. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Operational Noise Limits					
H6.	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in the Noise Impact Assessment dated 12 October 2021 and prepared by SLR consulting.		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Unobstructed Driveways and Parking Areas					
H7.	All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Green Travel Plan					
H8.	The Green Travel Plan approved under this consent must be updated annually and implemented unless otherwise agreed by the Planning Secretary.		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Ecologically Sustainable Development					
H9.	Unless otherwise agreed by the Planning Secretary, within six months of commencement of operation, Green Star certification must be obtained demonstrating the development achieves a minimum 4 star Green Star Design & As Built rating. If required to be obtained, evidence of the certification must be provided to the Certifier and the		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	Planning Secretary. If an alternative certification process has been agreed to by the Planning Secretary under condition E1313, evidence of compliance of implementation must be provided to the Planning Secretary and Certifier.				
Outdoor lighting					
H10.	Notwithstanding condition F3218, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Landscaping					
H11.	Letterboxes, landscaping and any other obstructions to visibility are to be kept clear of or limited in height to 1.2m in the 2 metre by 2.5 metre splay within the property boundary each side of the access road – kiss and ride exit driveway in accordance with <i>AS/NZS 2890.1:2004 - Parking facilities - Off-street car parking</i>		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
Signage					
H12.	All signage approved under this consent must be continuously maintained in a structurally sound and tidy manner by the Applicant for the duration of the development.		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
H13.	The illumination of signage and LED screen/s must be switched off between 6pm and 7am, unless otherwise agreed by the Planning Secretary.		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
H14.	The lighting to be used in connection with approved signage including the LED screen must comply with the latest version of <i>AS 4282-2019 - Control of the obtrusive effects of outdoor lighting</i> .		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	
H15.	The LED sign must not: (a) dazzle or distract drivers due to colouring of the digital content;		Operations did not commence during the Audit Period as all works were limited to construction. Therefore, this condition was not triggered during the Audit Period.	Not triggered	

TABLE A1: COMPLIANCE WITH CONDITIONS OF DEVELOPMENT APPROVAL SSD-13895306

Con.	Compliance Requirement (SSD-13895306)	Evidence Collected	Audit Findings and Recommendations	Compliance Status	NC #
	<ul style="list-style-type: none"> (b) be able to be mistaken for a traffic signal because the digital content has, for example, red, amber, or green circles, octagons, crosses or triangles; (c) be able to be mistaken as an instruction to drivers; (d) display advertising or messages which contain fully animated or video/movie style advertising or images; (e) display advertising material unrelated to the school; (f) be used for any live television, satellite, internet or similar broadcast; (g) emit sound; and (h) must have a default setting that will display an entirely black display area when no content is being displayed or if a malfunction occur. 				

Appendix 2 Audit Team Endorsement

NSW Planning ref: SSD-13895306-PA-28

David Frazer
Head of Finance and Business Services
Newcastle Grammar School Limited
Awabakal Country
60 Newcomen Street
The Hill NSW 2300
10/10/2024

Sent via the Major Projects Portal only

Subject: Newcastle Grammar School - Park Campus - IEA - Auditor Proposal

Dear Mr Frazer

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Environmental Audit of the Newcastle Grammar School - Park Campus, submitted as required by Schedule 3, Condition F38 of SSD-13895306 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 2 October 2024.

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

In accordance with Schedule 3, Condition F38 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements (2020)*, as nominee of the Planning Secretary, I endorse the following independent audit team:

- Victoria Sedwick – Lead Auditor
- Shaun Taylor – Assistant Auditor
- Charyssa Lawrence – Assistant Auditor

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

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

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Should you wish to discuss the matter further, please contact Joel Fleming, (Senior Compliance Officer) on 02 6575 3416 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary

Appendix 3 Site Inspection Photos



Photo 1: Stage 1 Union Street Building



Photo 2: Union Street Site Entrance/Exit



Photo 3: Union Street Site Entrance/Exit looking from within Site



Photo 4: Waste Storage Area



Photo 5: Internal Access Road looking towards Corlette Street



Photo 6: Stage 1 Union Street Building looking towards Union Street



Photo 7: Site fencing looking towards Union Street



Photo 8: Site fencing looking towards Union Street



Photo 9: Tree Protection Zone (1)



Photo 10: Tree Protection Zone (2) showing tree hoarding



Photo 11: Ground Floor Construction



Photo 12: First Floor Construction

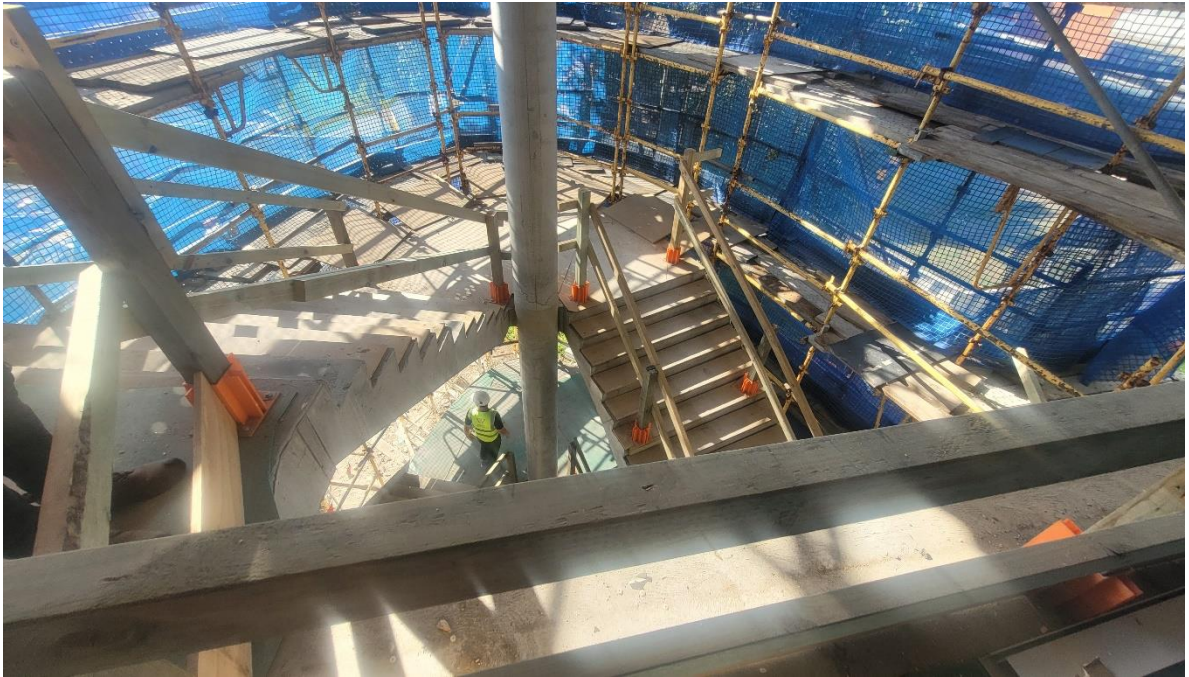


Photo 11: Staircase Construction



Photo 12: Classroom Construction



Photo 13: Internal Staircase Construction (1)



Photo 12: Internal Staircase Construction (2)



Photo 14: Top floor Construction

Appendix 4 Auditor Declaration of Independence

Independent Audit Report Declaration Form

Project Name	Newcastle Grammar School Park Campus Alterations and Additions
Consent Number	SSD-13895306
Description of Project	Newcastle Grammar School Park Campus redevelopment including alterations and additions
Project Address	127 Union Street, Cooks Hill, NSW
Proponent	Newcastle Grammar School
Title of Audit	Newcastle Grammar School Park Campus Independent Environmental Audit 3
Date	20 January 2025

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

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

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor	Victoria Sedwick
Signature	
Qualification	Exemplar Global Lead Auditor Accreditation No. 13180
Company	Ramboll Australia Pty Ltd
Company Address	The Arc, 45a Watt Street, Newcastle NSW 2300 Level 3/100 Pacific Hwy, North Sydney NSW 2060 41 St Georges Terrace, Perth Western Australia 6000

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- 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.

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

Name of Auditor	Shaun Taylor
Signature	
Qualification	B App Sc (Env Ass & Mgt) (Hons)
Company	Ramboll Australia Pty Ltd
Company Address	The Arc, 45a Watt Street, Newcastle NSW 2300 Level 3/100 Pacific Hwy, North Sydney NSW 2060 41 St Georges Terrace, Perth Western Australia 6000

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- 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.

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

Name of Auditor	Charyssa Lawrence
Signature	<i>C. Lawrence</i>
Qualification	B Sc (Earth Science) (Hons)
Company	Ramboll Australia Pty Ltd
Company Address	The Arc, 45a Watt Street, Newcastle NSW 2300 Level 3/100 Pacific Hwy, North Sydney NSW 2060 41 St Georges Terrace, Perth Western Australia 6000