



# INDEPENDENT ENVIRONMENTAL AUDIT REPORT

Cranbrook School, 5 Victoria Road, Bellevue Hill NSW

Cranbrook School c/o EPM Projects Pty Ltd



22 September 2020

19256 R3 Rev1



# Quality Management

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This report was prepared in accordance with the scope of services set out in the contract between Zoic Environmental Pty Ltd, ABN 23 154 745 525, and the client.

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## Executive Summary

Zoic Environmental Pty Ltd (Zoic) was engaged by the Cranbrook School (Client) to conduct an Independent Environmental Audit (IEA) of the development site, located on part 5 Victoria Road, Bellevue Hill NSW 2023 ('the site'). EPM Projects Pty Ltd, engaged by Cranbrook School, is the Project Manager and Richard Crookes Constructions Pty Ltd (RCC) the appointed civil /building contractor.

The boundary of the site covered by this IEA is provided in Appendix A.

The development site, which occupies an area of approximately 15,000m<sup>2</sup>, includes the demolition of existing structures and the construction of new school building and sporting facilities.

The purpose of the Independent Environment Audit is to provide an independent and objective assessment of the environmental performance and compliance of the construction phase to consent conditions for the approved development at Cranbrook School.

The overall objective of the current Audit is to confirm compliance with Independent Environmental Audit Conditions D31 to D36 of the NSW Department of Planning and Environment (DP&E) State Significant Development Approval (SSD 8812) ('SSD Approval') issued on 13 September 2019.

This audit is the second Construction Audit conducted within 6 months of construction commencing. This report is a revised report for the second Audit, and addresses DPIE review comments (received on 9 September 2020) related to reviewing items previously identified (by Zoic and report on 21 July 2020) as not-triggered.

A total of 119 items were assessed as part of SSD consent conditions. A summary of the findings is provided as follows:

- Number of compliances = 100 items
- Number of non-compliances = 0 items
- Number of non-triggered = 19 items

A total of 118 items were assessed as part reviewing compliance to the construction and environmental management plans. A summary of the findings is provided as follows:

- Number of compliances = 96 items
- Number of non-compliances = 0 items
- Number of non-triggered = 22 items

The findings of this initial IEA are presented in this document. There were no non-compliances identified. Based on the above, it is concluded that environmental performance and management, during the construction phase audited, is acceptable at the Site.



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## Glossary

Term	Description
Audit	Systematic, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled (ISO 19011:2018). For the purpose of this report, Audit refers to an Independent Environmental Audit in accordance with the NSW Government (June 2018) Independent Audit Post Approval Requirements
Audit criteria	Set of requirements used as a reference against which objective evidence is compared.
Audit evidence	Records, statements of fact or other information which are relevant to the audit criteria and verifiable.
Audit findings	Results of the evaluation of the collected audit evidence against audit criteria.
Audit conclusion	Outcome of an Audit after consideration of the Audit objectives and all audit findings.
Auditee	Organisation being audited.
Audit Program	Audit Schedule and Audit Table as defined in NSW Government (June 2018) prepared by Zoic prior to the commencement of the Audit.
Auditor	Person(s) who conduct(s) the Audit, as defined in this report. Lead Auditor and Auditor in Training
Audit Team	One or more persons conducting the Audit, supported if needed by technical experts.
Authorised Reporting Officer	A director, executive, employee or office of the proponent who is authorised by the proponent to submit formal reporting on the proponent's behalf.
Competence	Ability to apply knowledge and skills to achieve intended results.
Compliant	The Auditor has obtained sufficient evidence to demonstrate that the specific item being audited has been satisfied to the objective of the Audit.
CSSI	Critical State Significant Infrastructure
DoEE	The Commonwealth Department of the Environment and energy administering the EPBC Act, and includes the Minister for the DoEE
DP&E	NSW Department of Planning and Environment
DPIE	NSW Department of Planning, Industry and Environment (previously DP&E)
EIS	Environmental Impact Statement
Environmental Representative (ER)	A suitably qualified and experienced person independent of project design and construction personnel employed for the duration of Construction, who will be the principal point of advice in relation to all questions and complaints concerning environmental performance.
EP&A Act	NSW Environmental Planning and Assessment Act 1979
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
EPL	NSW Environment Protection Licence under the Protection of the Environment Operations Act 1997
Federal CoA	Federal DoEE Condition of Approval
Incident	An occurrence or set of circumstances that causes, or threatens to cause material harm and which may or may not be or cause a non-compliance.
Minister	Minister of DPIE or delegate.
NSW CoA	NSW DPIE Condition of Approval



Term	Description
Non-compliant	The Auditor has not obtained sufficient evidence to demonstrate that the specific item being audited has been satisfied to the objective of the Audit.
Not triggered	The specific item has not been activated at the time of the Audit and therefore, the Audit was not completed for the item.
Planning Secretary	The Planning secretary under the EP&A Act or nominee.
PoEO Act	NSW Protection of the Environment Operations Act 1997
Post approval document	A document required by conditions of consent, including Environmental Management Plans and Sub-plans.
Predicted impact	Predicted impacts described in the Environmental Impact Assessment documents that comprise the approved project (if available).
Project	As per definition in Section 1
Proponent	The person or entity that is referred to as the proponent in an approval or the applicant in a consent or any other person carrying out any part of the development to which the approval or consent applies.
Risk	Effect of uncertainty.
Site	As per definition in Section 1
State significant projects	Means any of the following in accordance with the EP&A Act: <ul style="list-style-type: none"><li>• State significant development projects</li><li>• State significant infrastructure projects, including critical State significant infrastructure projects</li><li>• Transitional Part 3A projects</li><li>• Part 4 projects for which the Minister is the consent authority</li></ul>



# 1 Introduction

Zoic Environmental Pty Ltd (Zoic) was engaged by the Cranbrook School (Client) to conduct an Independent Environmental Audit (IEA) of the development site, located on part 5 Victoria Road, Bellevue Hill NSW 2023 ('the site'). EPM Projects Pty Ltd, engaged by Cranbrook School, is the Project Manager and Richard Crookes Constructions Pty Ltd (RCC) is the appointed civil /building contractor.

The boundary of the site covered by this IEA is provided in Appendix A, and which occupies an area of approximately 15,000m<sup>2</sup>.

## 1.1 Background

The development site is located within the northern portion of the Senior School Campus of Cranbrook School and is referred to as the 'Cranbrook School redevelopment project'.

The proposed development includes:

- Demolition of the existing War Memorial Hall and Mansfield buildings to facilitate the construction of the New Centenary Building;
- Excavation of Hordern Oval to facilitate the construction of a subsurface car park and aquatic/fitness centre;
- New access driveway to the proposed car park;
- Use of the internal driveway between Victoria Road and Rose Bay Avenue ('the Kiss and Drop zone');
- Construction of a new Hordern Oval Groundsman's facility;
- Reinstatement of the Hordern Oval as a playing field; and
- Landscaping and general site improvements.

## 1.2 Purpose and Objective of Audit

The purpose of the Independent Environment Audit is to provide an independent and objective assessment of the environmental performance and compliance of the construction phase of the approved development at Cranbrook School. This audit is the second Construction Audit completed within 6 months of the initial Construction Audit. Zoic previously prepared an Audit report for the second Construction Audit on 21 July 2020. This revised report addresses DPIE feedback received on 9 September 2020 (provided in Appendix C).

The initial construction phase audit was conducted by Zoic on 5 February 2020 and reported on 26 February 2020 (Ref: 19256 R2).

The Construction of the project is anticipated to be 25 months, which commenced in late December 2019 with completion targeted by the end of 2021.

The overall objective of the Audit is to confirm compliance with Independent Environmental Audit Conditions D31 to D36 of the NSW Department of Planning and Environment (DP&E) State Significant Development Approval (SSD 8812) ('SSD Approval') issued on 13 September 2019, which states:





D31	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.
D32	Prior to commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Principal Certifying Authority.
D33	<p>Table 1 of the Independent Audit Post Approval Requirements (Department 2018) is amended so that the frequency of audits required in the construction phase is:</p> <ol style="list-style-type: none"><li>An initial construction Independent Audit must be undertaken within eight weeks of the notified commencement date of construction; and</li><li>A subsequent Independent Audit of construction must be undertaken no later than six months from the date of the initial construction Independent Audit.</li></ol> <p>In all other respects Table 1 remains the same. The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least 4 weeks' notice to the applicant of the date upon which the audit must be commenced.</p>
D34	<p>Independent Audits of the development must be carried out in accordance with:</p> <ol style="list-style-type: none"><li>the Independent Audit Program submitted to the Department and the Principal Certifying Authority under condition D32 of this consent; and</li><li>the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).</li></ol>
D35	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must:</p> <ol style="list-style-type: none"><li>review and respond to each Independent Audit Report prepared under condition D34 of this consent;</li><li>submit the response to the Department and the Principal Certifying Authority; and</li><li>make each Independent Audit Report and response to it publicly available within 60 days after submission to the Department and notify the Department and the Principal Certifying Authority in writing at least seven days before this is done.</li></ol>
D36	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.

This Independent Environment Audit was conducted in accordance with the requirements of the NSW Government (June 2018) Independent Audit Post Approval Requirements.

The Auditor notes that a more recent guideline (NSW Government (May 2020) Independent Audit Post Approval Requirements) has been issued, which supersedes the NSW Government (2018) guideline. Key changes to the guideline are associated with:

1. Changes in the frequency of Audit
2. Approval of the Audit team by the Department
3. Assessment of the environmental management system associated with the project is no longer required
4. The type of evidence required in evidence-based evaluation
5. Details required for the Audit findings
6. Timing and format of submission of the final IEA report to DPIE
7. Review of the IEA report by DPIE



We note that Items 2, 4 and 5 are addressed within our IEA and the update of the guideline does not affect the report. We have informed EPM on the updated guideline and are waiting for confirmation from EPM on whether the project will adopt the NSW Government (June 2018) or the NSW Government (May 2020). At the time of this IEA, the NSW Government (June 2018) which is being applied and is consistent with the SSD consent conditions. Based on telephone discussion with DPIE and the NSW Government (May 2020) Post-Approval Requirements for State-Significant Projects Fact Sheet, this is considered to be appropriate.

### 1.3 Audit Team

The Audit team comprised the following Zoic personnel:

**Table 1.1. Audit Team**

Name	Role
Rebeka Hall	Lead Environmental Auditor <ul style="list-style-type: none"><li>• Exemplar Global AU (ISO 19011:2018) (No. 7090575-5136510)</li><li>• NSW EPA Accredited Site Auditor (under Contaminated Land Management Act) (No. 0802)</li><li>• Certified Environmental Practitioner (General) EIANZ (No. 889)</li><li>• Certified Environmental Practitioner (Site Contamination Specialist) EIANZ (No. SC40913)</li><li>• BEnvSci (Hons) (Geology)</li></ul>
Dr Cheryl Halim	Auditor /Auditor Technical Specialist <ul style="list-style-type: none"><li>• BE (Chemical)</li><li>• PhD (Chemical Engineering)</li></ul>
Jack Braithwaite	Auditor Assistant <ul style="list-style-type: none"><li>• BSc (Environmental) (Hons)</li></ul>

It is noted that although Kylie Lloyd and Peter Moore were approved as Alternate Lead Auditor and Audit support for the project, they were not involved in the current Audit.

A declaration form indicating independence from the Project, is provided in Appendix B.

### 1.4 Environmental Representative

Richard Crookes Constructions Pty Ltd (RCC) was engaged to as the Principal Contractor for the project to complete civil and main works construction.

Mr David Sommerville (Senior Project Engineer) from RCC was the appointed Environmental Representative, who assisted Zoic during this Audit process. Project assistance was also provided by Ms Lara Saleh (RCC-Building Cadet).

### 1.5 Audit Scope

#### 1.5.1 Audit Scope (Physical and Temporal Boundaries)

The physical and temporal boundaries of the current IEA are as follows:

- Physical boundary: The development site is approximately 15,000m<sup>2</sup> and located within Lot 1 DP663630; Lots 9 – 18 DP9005; and Lots A – C DP186768. The boundary of this Audit is shown in the site plan included in Appendix A. The site fronts New South Head Road to the north and west, and Rose Bay Avenue to the east.



- Temporal boundary of the current audit is the review of environmental performance information between 6 February 2020 to 30 June 2020.

### 1.5.2 Audit Criteria (Audit Works)

The Audit criteria are identified by the conditions for SSD 8812 and the requirements outlined in the NSW Government (June 2018) Independent Audit Post Approval Requirements. These include:

- An assessment of compliance with the Conditions of Consent and other relevant approvals and licences, including SSD Approval Conditions
- An assessment of environmental performance of the construction site, including:
  - Assessment of actual impacts compared to predicted impacts documented in the Environmental Impact Statement (EIS) and Return to Submission (RTS) documents and Submitted Reports
  - Assessment of any incidents, non-compliances and complaints that have occurred on the project.
  - Assessment of any feedback received by DPIE, other agencies and stakeholders (as appropriate)
  - Assessment of performance for the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the Audit scope.
- A high-level assessment of the adequacy of the Project's construction environmental management plan (CEMP) and sub plans and their implementation.

## 1.6 Audit Period

This Audit comprises the second IEA for the site and covers a review period review of 5 February 2020 and up to the time of second Site Audit (30 June 2020).



## 2 Audit Methodology

### 2.1 Auditor Endorsement by DPIE

The Environmental Audit team was approved by DPIE approval in a letter dated 14 November 2019, attached in Appendix C, to meet Condition D31 of the SSD Approval.

### 2.2 Development of Audit Scope – Independent Audit Program

The Zoic (26 November 2019) Independent Environmental Audit Program Cranbrook School, 5 Victoria Road, Bellevue Hill NSW (Ref: 19256 R1) ('Audit Program') was prepared in accordance with AS/NZS ISO 19011:2018 Guidelines for Auditing Management Systems and the NSW Government (June 2018) guidelines. The Audit program provides the Audit scope, as listed in Section 1.4.

### 2.3 Site Audit Process

The Audit comprised:

1. Opening meeting
2. Compliance to Audit Program
3. Review of evidence of consultation with key stakeholders
4. Closing meeting
5. Issue of Draft Independent Environment Audit report
6. Review of additional information (if any)
7. Finalisation of Independent Environment Audit report

#### 2.3.1 Opening Meeting

The opening meeting was conducted on 30 June 2020. The agenda for the meeting and the record of attendees is provided in Appendix D.

#### 2.3.2 Sources of Information to Assess Compliance to Audit Program

Source of information reviewed to assess compliance to audit program included:

- Review of project records, documentation and reports
- Interviews with key project and construction project personnel (available during site inspection)
- Site walkover and inspection for implementation of environmental controls
- Review of complaints registers for the project

#### 2.3.3 Closing Meeting

The closing meeting was held two days after the Site Audit on 2 July 2020. It was agreed that the closing meeting could be conducted via email correspondence from Zoic, which provided an overview of key findings and timing for the Audit Report. The closing meeting email provided preliminary findings of the Audit, which identified potential non-compliances and opportunities



for improvement. Zoic identified additional records that were required to complete the audit process.

#### 2.3.4 Issue of Independent Environment Audit Report

The Draft Independent Environmental Audit Report was issued on 13 July 2020.

#### 2.3.5 Finalisation of Independent Environment Audit Report

The Draft IEA Report was reviewed by EPM, which reported no comment to add. The Final IEA report was issued on 21 July 2020.

#### 2.3.6 Revision of Independent Environmental Audit Report

This report is a revised version of the finalised report issued on 21 July 2020. It addresses comments received on DPIE (9 September 2020) to reassess items originated identified as 'not triggered'. Additional enquiries were made with key stakeholders to close out these items as tabulated in Appendix F.

### 2.4 Interviews

Interviews with construction project personnel were conducted on 30 June 2020. The following personnel were interviewed:

- David Sommerville – RCC Senior Project Engineer (Environmental Representative for this Project)
- Andrew Gulliford – RCC Site Manager for the Project
- Lara Saleh – RCC Building Cadet

### 2.5 Site Inspection

The Site Audit was conducted by Rebeka Hall, Cheryl Halim, and Jack Braithwaite on 30 June 2020, accompanied by David Sommerville (RCC), Andrew Gulliford (RCC), and Lara Saleh (RCC). The site inspection comprised a walkover of the construction footprint, the site perimeter, and local public road network.

### 2.6 Consultation

Evidence of consultation with the relevant agencies was reviewed by considering the EIS, RTS and other documents provided by RCC.

As part of the Audit Method, EPM and Cranbrook School were asked to provide feedback, if any, on the environmental performance of the construction activities. In an email provided to Zoic from Michael Nasiry of EPM dated 2 July 2020, it was stated that EPM and Cranbrook did not have any major concerns regarding the environmental measures being implemented by RCC. There were some minor items observed related to sediment control, dust, and road cleanliness identified in EPM's regular site visits, which were however rectified when flagged.

EPM state that RCC have been receptive to feedback from EPM and Cranbrook and have proactively addressed any concerns raised.

As part of future Audits, additional consultation with required parties will be completed including DPIE, and other relevant agencies identified at the commencement of the next Construction Audit.



## 2.7 Compliance Status Descriptors

The findings of the Audit have been divided into the following categories:

**Table 2.1. Compliance Evaluation**

Assessment	Criteria
Compliant	Sufficient verifiable evidence is available to demonstrate that all elements of the requirement have met
Non-Compliant	One or more specific elements of the conditions or requirements have not been met
Not-Triggered	A requirement has an activation of timing trigger that has not been met at the time of the audit, therefore compliance is not relevant. Items not considered for Independent Environment Audit have also been recorded as "Non-Triggered."



## 3 Audit Findings

### 3.1 Evidence of Consultation

The Urbis (May 2018) Environmental Impact Statement SSD8812 Cranbrook School ('EIS') stated that the following entities were consulted during the preparation of the EIS:

- Woollahra Municipal Council
- Government Architect NSW (GANSW)
- Transport for New South Wales (TfNSW)
- Roads and Maritime Services (RMS)
- Service providers
- Local community including school community, special interest groups and affected landowners

The Urbis (14 February 2019) Cranbrook School – Final Response to Submissions – SSD17\_18812 ('RTS') indicated that submissions were received from the following agencies:

- Office of Environment and Heritage (OEH)
- TfNSW
- RMS
- Sydney Water
- GANSW
- Woollahra Municipal Council

The items raised during consultation were addressed by EPM in the preparation of documents for the Return to Submission (by Urbis) or added into the condition of consent issued by DPIE.

The Auditor considers that there has been adequate consultation with relevant agencies.

At the request of DPIE, additional consultation will be conducted by the Auditor to relevant stakeholders in the subsequent Audit.

### 3.2 Agency Notices, Orders, Penalty Notices or Prosecutions During Audit Period

The Auditor is unaware of any agency notices, orders, penalty notices or prosecutions during Audit period.

### 3.3 Audit Process

#### 3.3.1 Documents Audited

The following documents were reviewed:

**Table 3.1. Audited Documents**

SSD Reference	Document Details
Environmental Impact Statement and	Urbis (May 2018) Environmental Impact Statement SSD8812 Cranbrook School and relevant subplans.



SSD Reference	Document Details
Response to Submission	Urbis (14 February 2019) Cranbrook School – Final Response to Submissions – SSD17_18812 and relevant subplans.
SSD 8812 Development Consent	SSD 8812 dated 13 September 2019
C5	Douglas Partners (March 2019) Unexpected Finds Protocol Cranbrook School Victoria Road, Bellevue Hill.
C12 Construction Environmental Management Plan	Richard Crooks Constructions (12 November 2019) Cranbrook Stage 2 Redevelopment Project 5 Victoria Avenue, Bellevue Hill Construction Environmental Management Plan (CEMP) and relevant subplans, including: <ol style="list-style-type: none"> <li>1. PTC (13 November 2019) Construction Traffic Management Plan Cranbrook School, Bellevue Hill.</li> <li>2. Acoustic Logic (1 November 2019) Cranbrook School Redevelopment Construction Noise and Vibration Management Plan.</li> <li>3. RCC (21 October 2019) Cranbrook School Stage 2 Redevelopment 5 Victoria Avenue, Bellevue Hill Construction Waste Management Plan.</li> <li>4. SCP (30 October 2019) Construction Soil and Water Management Plan Cranbrook School, Bellevue Hill.</li> <li>5. SCP (25 October 2019) Flood Emergency Response Plan.</li> <li>6. Unexpected Finds Protocol for Contamination</li> <li>7. Unexpected Finds Protocol for Aboriginal &amp; Non-Aboriginal Heritage</li> <li>8. Douglas Partners (30 October 2019) Insitu Waste Classification &amp; ENM Assessment Hordern Oval Cranbrook School, Bellevue Hill.</li> <li>9. Douglas Partners (16 July 2018) Groundwater Monitoring Results Cranbrook School, Bellevue Hill.</li> </ol>
C13 Construction Traffic Management Plan	PTC (13 November 2019) Construction Traffic Management Plan Cranbrook School, Bellevue Hill.
C14 Construction Noise and Vibration Management Plan	Acoustic Logic (1 November 2019) Cranbrook School Redevelopment Construction Noise and Vibration Management Plan.
C15 Construction Soil and Water Management Plan	SCP (30 October 2019) Construction Soil and Water Management Plan Cranbrook School, Bellevue Hill.
C21 Construction Worker Transportation Strategy	RCC (2 December 2019) Cranbrook School Stage 2 Redevelopment 5 Victoria Avenue, Bellevue Hill.

Other supporting documents reviewed are provided in the completed Audit Table in Appendix F.

### 3.3.2 Summary of Previous Audit or Compliance Review Findings

Zoic Environmental completed an initial Independent Environmental Audit within the first two months of construction on 5 February 2020. The findings of the Audit are summarised below.

#### Past non-compliance with SSD conditions

A total of 119 items were assessed as part of SSD consent conditions. A summary of the findings is provided as follows:

- Number of compliances = 54 items
- Number of non-compliances = 1 item
- Number of non-triggered = 64 items

The following non-compliance with SSD conditions identified during the first IEA and subsequent action were identified:





**Table 3.2. Details of Non-Compliance with SSD Conditions Implementation**

<b>Zoic Item No.</b>	<b>SSD Condition</b>	<b>Auditor's Findings in IEA1</b>	<b>Actions Taken</b>
Z108	D29	<p>Whilst no waste classification is available for asbestos waste, the Auditor notes that this material was previously classified as general solid waste and the material was disposed of as asbestos waste due to unexpected find. This is considered appropriate; however, any further unexpected finds should be appropriately waste classified.</p> <p>Material classified as ENM by Douglas Partners (DP) (comprising topsoil and fill across the site) was reclassified as VENM by ECS. Given the conflicting information and the absence of photographs in both reports, the Auditor is unable to assess if this material was appropriately classified, noting that DP borehole logs indicated the presence of fill in many of the investigation locations. However, in our professional opinion, the fill and reworked material at the site should have been disposed of as ENM rather than VENM.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> <li>• Ensure appropriate waste classification of materials disposed offsite (in accordance with NSW EPA 2014 Waste Guidelines)</li> <li>• Consider engagement of a Certified Environmental Practitioner specialised in Site Contamination (CEnvP SC) should contamination be identified during construction works.</li> </ul>	<p>ECS (23 June 2020) 'Waste Classification Confirmation Cranbrook School Bellevue Hill' which states that 4 previous inspections occurred (10 and 27 Jan, 29 Feb, and 14 May 2020. Inspection of the underlying sand and sampling for total recoverable hydrocarbons, polycyclic aromatic hydrocarbons, and heavy metals indicated that the material was consistent with the VENM classification.</p> <p>On the Auditor's inspection on 30 June 2020, the excavated material was observed to be consistent with VENM, however some anthropogenic material (concrete etc.) was observed on the surface (from demolition of slab). RCC confirmed that the anthropogenic material was screened out prior to offsite disposal. This practice was also observed onsite.</p> <p>This item is considered to have been addressed.</p>

### Past Non-Compliances on Environmental Management Plans

A total of 118 items were assessed as part of assessment of review of management plans compliance. A summary of the findings is provided as follows:

- Number of compliances = 67 items
- Number of non-compliances = 7 item
- Number of non-triggered = 44 items

The following non-compliances with management plans in the first IEA and subsequent items were identified:

**Table 3.3. Details of Non-Compliance with Management Plan Implementation**

<b>Zoic Item No.</b>	<b>Element</b>	<b>Auditor's Findings</b>	<b>Actions Taken</b>
Z139	Waste classification	The Auditor identified potential waste misclassification, as discussed for Item Z108 in Section 3.5.2.	ECS (23 June 2020) 'Waste Classification Confirmation Cranbrook School Bellevue Hill' which states that 4 previous inspections occurred (10 and 27 Jan, 29 Feb, and 14 May 2020. Inspection of the underlying sand and sampling for total recoverable hydrocarbons,



Zoic Item No.	Element	Auditor's Findings	Actions Taken
			<p>polycyclic aromatic hydrocarbons, and heavy metals indicated that the material was consistent with the VENM classification.</p> <p>On the Auditor's inspection on 30 June 2020, the excavated material was observed to be consistent with VENM, however some anthropogenic material (concrete etc.) was observed on the surface (from demolition of slab). RCC confirmed that the anthropogenic material was screened out prior to offsite disposal. This practice was also observed onsite.</p> <p>This item is considered to have been addressed.</p>
Z141	Tree Protection Zones	<p>No signage was observed on tree protection zones (TPZ). Site induction does not cover work near tree protection zones. The Auditor recommends signage and updating induction to include awareness of TPZ.</p>	<p>On the Auditor's inspection on 30 June 2020, TPZ signage was placed in visible locations along TPZ fencing, which appeared to be constructed sufficiently to address the requirements.</p> <p>The Auditor has reviewed RCC site induction PowerPoint slide, which includes discussion on work around TPZ.</p> <p>This item is considered to have been addressed.</p>
Z144	Silt and Runoff Control	<p>The Auditor observed that silt fencing had been installed around the hoarding fence. During the site inspection part of the silt fencing had been damaged in an area where site workers were moving the hoarding.</p> <p>Sediment was observed within drainage guttering along Rose Bay Ave. Evidence of silt washing was observed from the adjoining footpath from unvegetated surfaces. Discussion onsite with site representative indicated that the sediment identified at the gutter may have arisen from sediment loaded runoff from the wheel wash area at the main gate.</p> <p>The Auditor recommends stabilisation of unvegetated ground along Rose Bay Avenue and sediment control to be conducted as per Landcom (2004).</p>	<p>On the Auditor's inspection on 30 June 2020, a fully operating cattle grid and wheel wash station has been installed at the main gate, minimising sedimentation onto public roads.</p> <p>Additionally, the unvegetated surface on Rose Bay Ave was observed to be mulched. No sediment was observed entering the stormwater drain.</p> <p>This item is considered to have been addressed.</p>
Z146	Site Induction	<p>Limited information was conveyed to Auditors who were signed in as visitors. The Auditor recommends visitor site induction to include awareness of appropriate site behaviour, risks and hazards at the site.</p>	<p>On the Auditor's inspection on 30 June 2020, visitor induction conducted to Zoic met requirements.</p> <p>This item is considered to have been addressed.</p>
Z172	Secondary Control for fuel/chemical storage and handling	<p>The Auditor observed:</p> <ul style="list-style-type: none"><li>• Spill kits located near site sheds, and not within work zones.</li><li>• Chemical and fuel storage/handling areas not bunded or not conducted on hardstand. Isolated surface staining associated with refuelling, observed around some generators.</li></ul>	<p>On the Auditor's inspection on 30 June 2020, chemical storage was observed to be placed within a bunded area, with a spill kit nearby.</p> <p>This item is considered to have been addressed.</p>



Zoic Item No.	Element	Auditor's Findings	Actions Taken
		<p>The Auditor recommends:</p> <ul style="list-style-type: none"> <li>Fuel decanting to be conducted within appropriately bunded areas or on hardstand. Spill kits should be located in areas where refuelling activities occur.</li> <li>Scrape and dispose of any oil stained soils.</li> </ul>	
Z210	Excavation Fencing	<p>Incomplete fencing around the north-western excavation was observed.</p> <p>The Auditor recommends that hazard marker to be placed around any major excavations or any benched areas.</p>	<p>On the Auditor's inspection on 30 June 2020, adequate fencing was noted around deep excavations.</p> <p>This item is considered to have been addressed.</p>
Z230	Equipment Maintenance	<p>RCC advised that vehicle maintenance is generally conducted offsite. A designated area will be constructed onsite to enable select equipment maintenance to occur.</p> <p>Future Audits will confirm that equipment maintenance is constructed in designated area that is impervious and bunded to prevent contamination to ground and waterways.</p>	<p>On the Auditor's inspection on 30 June 2020, RCC indicated that vehicle and equipment maintenance occurs onsite within a designated area. Information by RCC indicates that this area is lined with geotextile liner. RCC also provided site plan detailing a vehicle maintenance area and site photos demonstrating that the area is underlain by geotextile material and roadbase. The area is located within a bunded area.</p> <p>This item is considered to have been addressed.</p>

### 3.3.3 Site Inspection Observations and Interviews

Observations made during site inspection (including photographs) and interviews are recorded in Appendix E and F. A summary of the main findings is provided in Section 3.5.

### 3.3.4 CEMP, Sub-plans and Post Approval Documents

The Auditor considers that the RCC CEMP and sub-plans are generally appropriate for the works to be undertaken to address potential environmental impact.

## 3.4 Environmental Management System

The Auditor conducted a high-level review of the adequacy of the RCC environmental management system (EMS) being implemented for the project. The audit findings are summarised in Table 3.2.

**Table 3.4. Environmental Management System Components Evaluated**

EMS Component	Requirement	Auditor's Review
Legal requirements and third-party certification	Identification of applicable legislative requirements, standards, codes of practice, industry guidelines, third party certification with respect to the project scope.	Legislative requirements were listed in the CEMP.
Environmental policy	Availability of environmental policy for the project scope.	The Auditor has sighted RCC's Environmental Policy.



EMS Component	Requirement	Auditor's Review
Planning	Preparation of appropriate documentations as required by the development consent to address environmental risk.	The EMS during the construction phase comprised the implementation of the CEMP and associated subplans. Plans were prepared and submitted to relevant agencies to meet SSD conditions.
Implementation and operation	Implementation of environmental management plans during the project.	This was assessed as part of the compliance assessment with results documented in the Audit Table in Appendix F.
Checking and corrective action	Monitoring of the performance during the implementation of the environmental management plan and implementation of corrective actions when non-compliances are identified.	<p>The CEMP provides a mechanism for monitoring the implementation of the environmental management plans and any corrective actions.</p> <p>RCC implements monitoring of environmental performance, which is documented on a checklist, with performance reported twice a month. This was sighted by the Auditors. A Complaint Register was provided, with evidence that complaints were resolved within two days.</p>
Management review	Program to review the project EMS to demonstrate its continued application to the project.	<p>Section 1.4 of the CEMP provides a requirement for the Project Manager (EPM) to conduct regular audits of the Principal Contractor's (RCC) implementation of the CEMP.</p> <p>Based on the information provided by RCC, the CEMP will be reviewed in the near future to address the SSD requirement. This will be reviewed in the subsequent Audit.</p>

### 3.5 Assessment of Compliance for Current Audit

#### 3.5.1 Summary of Assessment of Compliance

Zoic issued a version of the IEA report on 21 July 2020, which provided the following assessment of compliance, which focused on items associated with environmental compliance of the project:

- A total of 119 items (including Appendix 1) were assessed as part of SSD consent conditions. A summary of the findings is provided as follows:
  - Number of compliances = 30 items
  - Number of non-compliances = 0 items
  - Number of non-triggered = 89 items
- A total of 118 items were assessed as part of assessment of review of management plans compliance. A summary of the findings is provided as follows:
  - Number of compliances = 62 items
  - Number of non-compliances = 0 items
  - Number of non-triggered = 56 items

Following DPIE feedback on the 21 July 2020 report, this Audit was revised to include all SSD conditions associated with the construction phase of the project (Conditions A to D). The updated compliance assessment is provided in Appendix F, with findings summarised as follows:



- A total of 119 items (including Appendix 1) were assessed as part of SSD consent conditions. A summary of the findings is provided as follows:
  - Number of compliances = 100 items
  - Number of non-compliances = 0 items
  - Number of non-triggered = 19 items
- A total of 118 items were assessed as part of assessment of review of management plans compliance. A summary of the findings is provided as follows:
  - Number of compliances = 96 items
  - Number of non-compliances = 0 items
  - Number of non-triggered = 22 items

It is noted that the updates to the assessment were related to items previously assessed as not relevant to Environmental Audit and assessed as being non-triggered.

### 3.5.2 Discussion of SSD Condition Non-Compliance

There were no non-compliances identified against the SSD conditions as part of the Audit Scope.

### 3.5.3 Performance of Environmental Management Plans for Current Audit

The assessment of suggested mitigation measures from the EIS and RTS versus actual impact is assessed in the Audit Table in Appendix F and is summarised in Table 3.3.

**Table 3.5. Environmental Impact Assessment**

Environmental Aspect	Requirement	Auditor's Review
Traffic and parking	Impact on key intersections as a result of traffic generation onsite are acceptable. Construction vehicles do not provide disruption to public roads.	<ul style="list-style-type: none"> <li>• Traffic access and flow and parking were observed to be adequate.</li> <li>• Traffic controllers were observed.</li> <li>• Traffic plan signage was observed on Rose Bay Avenue.</li> <li>• No major occurrence of soil/silt observed on public roads at the time of the site inspection (30 June 2020), noting a watercart was available onsite.</li> <li>• Five complaints were made on traffic issues related to concrete vehicle movement during school hours, trucks parking on Rose Bay Ave, truck transport route, out of hours truck travel, and use of a driveway for 3-point turns. All complaints were responded to within two days and resolved.</li> <li>• Barriers were placed to prevent pedestrian access in front of main construction gate.</li> <li>• No incidents reported to date.</li> </ul>
Noise and vibration	Working hours are within approved hours. There is no significant noise generation at the site boundary. Any incidents/complaints are addressed.	<ul style="list-style-type: none"> <li>• Sign in records were provided to confirm working hours were generally within approved hours.</li> <li>• During the site inspection, site activities did not appear to generate excessive noise. Elevated background noise observed along New South Head Road.</li> <li>• A handheld noise monitor is used by site personnel to log sound around the perimeter of the construction site. Whilst the levels recorded were above the allowable level, it is considered that this is likely due to the heavy traffic along New South Head Road.</li> </ul>



Environmental Aspect	Requirement	Auditor's Review
		<ul style="list-style-type: none"><li>• Continual vibration monitoring is conducted onsite. The monitor has a trigger that sends an SMS message to site managers when the adopted criteria are exceeded.</li><li>• There were five complaints made on noise and vibration issues related to vibration impact to dwellings, and out of hours works. All complaints were responded to within two days and any corrective action taken.</li><li>• No incidents reported to date.</li></ul>
Heritage	No unacceptable impacts to heritage items during demolition and development. Any identified heritage items are managed in accordance with relevant management plans.	<ul style="list-style-type: none"><li>• A letter by Unearthed Archaeology &amp; Heritage (20 November 2019) confirms that archaeological test excavations have been conducted in accordance with the Aboriginal Cultural Heritage Report. Excavations in the vicinity of the War Memorial / Mansfield Buildings and the proposed location of the Centenary Building do not require further archaeological investigation. The archaeological test investigations across Hordern Oval, Fitness Centre and Carpark are ongoing with a heritage consultant present during construction.</li><li>• Unearthed Archaeology &amp; Heritage (UAH) letter dated 9 April 2020 providing an update on areas that have been and are yet to be investigated.</li><li>• Based on information by RCC, no heritage items (Aboriginal or non-Aboriginal) were identified during the construction work.</li><li>• A heritage assessment/validation report is to be provided at the completion of excavation and will be reviewed in the next IEA.</li><li>• One incident was reported where excavation occurred in an area still under investigation by UAH arising from miscommunication. Some spot sieving of the stockpiled soil sourced from the excavation identified an Aboriginal artifact. Corrective action was implemented by RCC and the issue closed out. Further discussion of the incident is provided in Section 3.5.6.</li></ul>
Sediment, erosion and dust	Sediment and erosion controls are adequate to control erosion and do not enter stormwater system or surrounding streets. Dust are confined within the site. Any incidents/complaints are addressed.	<ul style="list-style-type: none"><li>• Observations during site inspection on 30 June 2020 indicated:<ul style="list-style-type: none"><li>- Sand-bags were placed around the downgradient perimeter.</li><li>- Mulching was observed along Rose Bay Ave outside the perimeter hoarding after removal of trees.</li><li>- Silt fencing was installed outside the hoarding fence.</li><li>- Drainage along Rose Bay Ave was observed to be generally free of silt and sediment and had sand-bags.</li><li>- Stockpiles of soil, construction and demolition waste were observed (and segregated) across the site. One main soil stockpile was present in the central portion of the site. A stockpile of concrete waste was observed near an excavator that was using a sieve bucket to remove any material that may have entered the stockpile.</li><li>- No dust or odour was observed at the time of site inspection on 30 June 2020. Dust mitigation measures (dust monitoring, water spray using water cannon, watercart and perimeter water spray) were in place.</li><li>- Geofabric was observed on site surfaces that were not in use to stabilise soils.</li><li>- A stabilised site access was observed with cattle grid and wheel wash. Wheel wash water drained back to the site and infiltrated the site surface.</li></ul></li><li>• No complaints registered to date regarding sediment runoff.</li><li>• No incident reported to date.</li></ul>



Environmental Aspect	Requirement	Auditor's Review
Waste	Waste classification is appropriate. Waste is transported to a site that is licensed to receive the waste.	<ul style="list-style-type: none"><li>• Material tracking for sand reuse was sighted.</li><li>• Dumped monthly waste summaries were provided for May and June 2020 indicating the type, volume, and destination of waste streams at the site.</li></ul>
Hazardous materials	Hazardous material survey conducted. Appropriately licensed contractors were engaged to remove hazardous materials. Appropriate signage and exclusion zones maintained.	<ul style="list-style-type: none"><li>• The majority of demolition was complete at the time of Audit. Some remaining retaining walls/slab in the southern portion of site.</li><li>• Hazardous material survey and asbestos removalist licence were sighted as part of the previous Audit.</li><li>• Clearance certificate provided after removal of asbestos from building(s) was observed as part of the previous Audit. A clearance certificate will be provided following complete slab removal.</li><li>• Next IEA will revisit clearance certificate after slab removal.</li></ul>
Trees	No damage to trees that were identified to be retained. Adherence to mitigation measures identified in Arboricultural Impact Statement	<ul style="list-style-type: none"><li>• An arborist had been appointed, which has prepared Botany (October 2019) Construction Impact Assessment and Management Plan Cranbrook Senior School.</li><li>• Observations during site inspection on 30 June 2020 indicated that tree protection zones were established with fencing. Established cover (grass, weeds, mulch) was observed around the trees. Site gradient prevents work around the trees on the south-eastern boundary. Appropriate signage of TPZs was observed.</li><li>• During the visitor site induction, the Auditors noted that TPZs were included as part of the induction.</li></ul>
Security	No unauthorised entry to the construction site	<ul style="list-style-type: none"><li>• Hoardings and signage were observed around construction sites which restricted access at the site.</li></ul>
Biodiversity	No adverse ecological impacts as a result of development	<ul style="list-style-type: none"><li>• See sediment control review above.</li><li>• No weed control or night lighting required onsite.</li></ul>
Wind impacts	No unacceptable impacts on the seating areas	<ul style="list-style-type: none"><li>• Not applicable at the time of Audit</li></ul>
Social impacts	Acceptable site personnel behaviour inside and external to the site	<ul style="list-style-type: none"><li>• Site induction and toolbox records were sighted.</li><li>• Auditor induction on 30 June 2020 (as visitors) was comprehensive, with information communicated regarding acceptable site behaviour, TPZs, risk and hazards onsite.</li></ul>
Chemicals	Chemicals are appropriately stored, with bunding where appropriate. No evidence of contaminants is observed as a result of chemical use.	<ul style="list-style-type: none"><li>• Observations during the site inspection on 30 June 2020 indicated:<ul style="list-style-type: none"><li>- Spill kits were observed available within the chemical storage area and strategically around the site near plant/equipment.</li><li>- A dedicated vehicle maintenance area with a geofabric layer underlying the area.</li><li>- Secondary bunding in areas where fuels/chemicals are stored or during refuelling of equipment.</li><li>- Self-bunded chemical cupboards and storage cages.</li></ul></li></ul>
Contamination	Any identified contaminated material is contained, appropriately assessed by suitably qualified environmental consultant, and remediated and/or managed.	<ul style="list-style-type: none"><li>• Based on interview with RCC, there were no unexpected finds related to contamination at the site to date.</li></ul>





Environmental Aspect	Requirement	Auditor's Review
	Records of unexpected finds and their management are provided.	
Water	Site surface water is managed. No potential discharge of contaminated water. Any incidents/complaints are addressed.	<ul style="list-style-type: none"><li>• The initial Zoic IEA (5 February 2020) reported that sediment was previously observed in Rose Bay Ave gutters which may have arisen from sediment loaded runoff from the wheel wash area at the main gate. At the time of the initial Zoic Site Audit (5 February 2020), construction of a new drainage and sump to direct water from the wheel wash area was observed and the following recommendations were made:<ul style="list-style-type: none"><li>- Sediment control to be conducted as per Landcom (2004).</li><li>- Implement measures to regularly inspect and unblock perimeter drains, in consultation with Council.</li></ul></li><li>• During the current site Audit conducted on 30 June 2020 the following was noted:<ul style="list-style-type: none"><li>- Site surface water was generally allowed to self- drain into the site.</li><li>- Water from site amenities was pumped into a tank located near site compound.</li><li>- The site access comprised a cattle grid and wash down bay. The wash down water was allowed to drain back to the site.</li><li>- Gutters and kerbside stormwater drains were observed to be clear of sediment loads and the roadways were clear of any tracked material.</li></ul></li><li>• No complaint registered regarding water issues.</li><li>• No incident reported to date.</li></ul>

### 3.5.4 Summary of Non-Compliances with Environmental Management Plans

No non-compliances were identified regarding procedures outlined in the EIS, RTS and CEMP.

### 3.5.5 Complaints and Management of Complaints

RCC provided a complaints register, which indicated 11 complaints had been received during the current Audit period. These were related to traffic movements, out of hours site use, vibration, and a car being sprayed with some concrete. At the time of the review (30 June 2020), all the issues had been resolved within two days of the complaint being lodged.

### 3.5.6 Incidents and Management of Incidents

One incident was reported for the current Audit Period, where excavation occurred in an area still under investigation by UAH due to miscommunication. This included some spot sieving of the stockpiled soil sourced from the excavation identified an Aboriginal artifact. Corrective action proposed and implemented by RCC included:

- All future correspondence between parties are supported with marked up drawing and concise written correspondence.
- A specific Aboriginal heritage induction is to be provided for all site workers current and future (as part of the site induction).
- Approval from archaeologists must be obtained prior to any excavation or ground disturbance being undertaken at the site and where excavation reaches natural soils, excavation will cease, and archaeological investigation must be undertaken.





- If natural soil profiles are encountered then a meeting will be held with relevant supervisors from RCC, UAH, and CF Group to discuss steps moving forward.
- A final close out certificate will be issued once Aboriginal archaeological investigations/or excavation to the final bulk levels have been reached and sufficient archaeological information has been obtained.ps moving forward.

An incident report was prepared by RCC on 15 April 2020 which outlined the incident and corrective actions. The incident report was provided to DPIE by EPM on 17 April 2020, which meets SSD condition A25 (Item Z25).



## 4 Strengths and Recommendations

### 4.1 Key Strengths of the Project Environmental Management and Performance

During the audit process, RCC demonstrated a high level of understanding of the environmental management requirements with exceptional record keeping. Where potential environmental issues were identified and flagged during the site inspection, RCC demonstrated positive behaviour in rectifying such issues and was open to discussion on suggested improvements.

Additionally, the Auditor observed significant improvement on the environmental performance during this Audit compared to the initial Audit, with all non-compliances identified during the initial Audit rectified by RCC.

### 4.2 Recommendations for Improvements

The Auditor makes the following recommendations:

- Any contaminated land work should be conducted by a Certified Environmental Practitioner specialised in Site Contamination.
- Review of environmental management strategies and plans are currently underway. RCC to submit a notification to DPIE and PCA notifying that a review is taking place. The updated documents must be provided to the Auditor with the changes highlighted. This will be subject of the next Audit.
- Asbestos clearance on removal of the slab is to be provided following completion of the slab removal.



## 5 Other Relevant Information

This report has been prepared for use by the Client who commissioned the works in accordance with the project brief only, as per the Audit scope provided in Section 1 only and has been based in part on information obtained from the Client and other parties. The findings of this report are based on the scope of work outlined in Section 1. The report has been prepared specifically for The Client for the purposes of the commission and use by any nominated third party in the agreement between Zoic and the Client. No warranties, express or implied, are offered to any third parties and no liability will be accepted for use or interpretation of this report by any third party (other than where specifically nominated in an agreement with the Client).

This report relates to only this project and was prepared based on the NSW Government (June 2018) Independent Audit Post Approval Requirements to satisfy approval conditions related to this Audit, as stated in the objectives and scope of work of this Audit. Subject to the scope of work, Zoic's assessment was limited strictly to identifying compliance to the conditions relevant to this Audit and does not include evaluation and opinion of any other issues. This report relates only to the objectives stated and does not relate to any other work conducted for the Client. The findings to this report were based on the observations made by the Auditor(s) during the scheduled Audits. Zoic cannot comment on compliances and non-compliances outside the scheduled Audits.

This report should not be reproduced without prior approval by the Client, or amended in any way without prior approval by Zoic.

All conclusions regarding the site are the professional opinions of the Zoic personnel involved with the project, subject to the qualifications made above. While normal assessments of data reliability have been made, Zoic assumes no responsibility or liability for errors in any data obtained from regulatory agencies, statements from sources outside of Zoic, or developments resulting from situations outside the scope of this project.

Zoic is not engaged in environmental assessment and reporting for the purpose of advertising sales promoting, or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity purposes. The Client acknowledges that this report is for its exclusive use.



## Appendix A Figures





DRAWING COLOUR CODED - PRINT ALL COPIES IN COLOUR

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Nominated Architect  
Ray Brown, NSWARB 6359

Do not scale drawings. Verify all dimensions on site

issue	amendment	date
1	ISSUED FOR 60% TENDER	10/08/2018
2	ISSUED FOR 80% TENDER	12/10/2018
3	TENDER ISSUE	15/02/2019

DESIGN DRAWINGS ARE BASED ON 3RD PARTY LIMITED SURVEY INFORMATION HILL & BLUME SURVEY DRAWING 41104016.1 14/05/10'. PRIOR TO CONSTRUCTION ALL SET-OUT DIMENSIONS AND SITE AND PROPERTY BOUNDARIES ARE TO BE VERIFIED ON SITE BY A REGISTERED SURVEYOR.

NOTIFY THE PROJECT ADMINISTRATOR IN WRITING OF COMPLIANCE TO THE DRAWINGS AND / OR ANY DISCREPANCIES.

THE CONTRACTOR IS TO VERIFY ALL DIMENSIONS, EXISTING LEVELS, EXISTING STRUCTURE, SERVICES, BUILDING FABRIC AND SITE FEATURES ON THE SITE PRIOR TO THE COMMENCEMENT OF ANY WORKS. WRITTEN CONFIRMATION OF THE COMPLIANCE BETWEEN THE DRAWINGS AND THE SITE IS TO BE PROVIDED TO THE CONTRACT ADMINISTRATOR. ANY DISCREPANCIES ARE TO BE REPORTED TO THE CONTRACT ADMINISTRATOR PRIOR TO THE COMMENCEMENT OF WORKS.

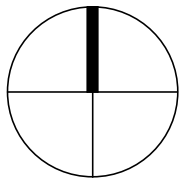
REDUCED LEVELS (RL) DATUM IS AUSTRALIAN HEIGHT DATUM (AHD) CO-ORDINATES ARE TO AUSTRALIAN MAP GRID (AMG).

client



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project

**CRANBROOK SCHOOL**  
STAGE 2 REDEVELOPMENT

drawing

**SITE SURVEY PLAN**

scale

As indicated@B1-SL

drawing no.

**CR-A00-011**

drawn

CV/LDC

issue

checked

CV/LDC

project no.

170013

**3**

FOR TENDER





## Appendix B Auditor Declaration



## Independent Audit Declaration Form


Project Name	Cranbrook School
Consent Number	8812
Description of Project	Construction and operation of the Cranbrook School
Project Address	5 Victoria Road, Bellevue Hill, NSW
Proponent	Cranbrook School c/o EPM Projects Pty Ltd
Title of Audit	Independent Environmental Audit of the Cranbrook School
Date	22 September 2020

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

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2018)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- 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;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

### Notes:

- 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 Lead Auditor	Rebeka Hall
Signature	
Qualifications	<ul style="list-style-type: none"><li>• Exemplar Global AU (ISO 19011:2018) (No. 7090575-5136510)</li><li>• NSW EPA Accredited Site Auditor (under Contaminated Land Management Act) (No. 0802)</li><li>• Certified Environmental Practitioner (General) EIANZ (No. 889)</li><li>• Certified Environmental Practitioner (Site Contamination Specialist) EIANZ (No. SC40913)</li><li>• BEnvSc (Hons) (Geology)</li></ul>
Name of Auditor/Technical Specialist	Cheryl Halim



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Signature

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Qualifications	<ul style="list-style-type: none"><li>• BE (Chemical)</li><li>• PhD (Chemical Engineering)</li></ul>
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Company	Zoic Environmental Pty Ltd
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Company Address	189 Kent St Sydney NSW 2000
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Name of Auditor/Technical Specialist	Jack Braithwaite
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Signature

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Qualifications	<ul style="list-style-type: none"><li>• BSc (Environmental)</li></ul>
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Company	Zoic Environmental Pty Ltd
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Company Address	189 Kent St Sydney NSW 2000
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## Appendix C Correspondence

## Cheryl Halim

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**From:** Michael Nasiry <mnasiry@epmprojects.com.au>  
**Sent:** Monday, October 28, 2019 3:36 PM  
**To:** Infrastructure.notifications@planning.nsw.gov.au; compliance@planning.nsw.gov.au  
**Cc:** Cranbrook Project Email; Todd Ewart; Matthew Alder; Cheryl Halim; Rebeka Hall; Natalie Cook  
**Subject:** SSD-8812 - Cranbrook School - Condition D31 - Request for Approval of Independent Auditor  
**Attachments:** 19256 L1 Notification 28Oct19.pdf

**Importance:** High

**Project:** Cranbrook School Redevelopment  
**Application No:** SSD-8812  
**Reason for Submission:** Request for Approval of Independent Auditor  
**Condition Number:** D31

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Hi,

We are the client side project managers assisting Cranbrook School in the delivery of their master plan redevelopment project. We will be progressively issuing all relevant documents to the Department of Planning, Infrastructure & Environment (DPIE) as required in the conditions of consent.

In order to satisfy Condition D31, Cranbrook has engaged **ZOIC Environmental Pty Ltd (ZOIC)** as the Independent Auditor for the project. Please refer to the attached letter prepared by ZOIC outlining their role and relevant experience on projects of a similar scale.

Can we please request your approval for the use of ZOIC on this project?

Yours sincerely,



**Michael Nasiry | Project Manager**

epm Projects Pty Ltd  
Level 2, 146 Arthur Street, North Sydney NSW 2060  
M: 0434 484 346 T: 61 2 9452 8300 F: 61 2 9452 8388  
W: [www.epmprojects.com.au](http://www.epmprojects.com.au)



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##-##-##

ZOIC Environmental Pty Ltd  
ABN 23 154 745 525  
Suite 1, Level 9  
189 Kent Street Sydney 2000  
Phone: +61 2 9251 8070  
[www.zoic.com.au](http://www.zoic.com.au)

19256 L1 Notification 28Oct19.docx

28 October 2019

Department of Planning and Environment  
c/o Michael Nasiry  
EPM Projects Pty Ltd  
Level 2, 146 Arthur Street  
North Sydney NSW 2060

Via email: [mnasiry@epmprojects.com.au](mailto:mnasiry@epmprojects.com.au)

Dear Sir/Madam,

**Re: Independent Environmental Audit, Cranbrook School, 5 Victoria Road, Bellevue Hill, NSW**

Zoic Environmental Pty Ltd (Zoic) has been engaged by the Cranbrook School to conduct an Independent Environmental Audit project for the Cranbrook School, 5 Victoria Road, Bellevue Hill, NSW ('the site'). The site is legally identified as Lot 1 DP663630, Lot 9 to 18 DP9005, Lot A to C DP186768.

The Independent Environmental Audit is conducted to meet Conditions D31 to D36 of State Significant Development (SSD) No. 8812, which state:

D31	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.
D32	Prior to commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Principal Certifying Authority.
D33	<p>Table 1 of the Independent Audit Post Approval Requirements (Department 2018) is amended so that the frequency of audits required in the construction phase is:</p> <ul style="list-style-type: none"><li>a. An initial construction Independent Audit must be undertaken within eight weeks of the notified commencement date of construction; and</li><li>b. A subsequent Independent Audit of construction must be undertaken no later than six months from the date of the initial construction Independent Audit.</li></ul> <p>In all other respects Table 1 remains the same. The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least 4 weeks' notice to the applicant of the date upon which the audit must be commenced.</p>
D34	<p>Independent Audits of the development must be carried out in accordance with:</p> <ul style="list-style-type: none"><li>a. the Independent Audit Program submitted to the Department and the Principal Certifying Authority under condition D32 of this consent; and</li><li>b. the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).</li></ul>
D35	In accordance with the specific requirements in the Independent Audit Post Approval



Requirements (Department 2018), the Applicant must:

- a. review and respond to each Independent Audit Report prepared under condition D34 of this consent;
- b. submit the response to the Department and the Principal Certifying Authority; and
- c. make each Independent Audit Report and response to it publicly available within 60 days after submission to the Department and notify the Department and the Principal Certifying Authority in writing at least seven days before this is done.

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D36	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.
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The Independent Environmental Audit will be conducted in accordance with the NSW Government Independent Audit Post Approval Requirement (June 2018).

The proposed audit team includes Rebeka Hall as Lead Auditor and Kylie Lloyd as Alternate Lead Auditor, supported by Peter Moore, Dr Cheryl Halim or Jack Braithwaite as Auditors. Qualifications are included as Attachment A to this letter.

The lead environmental auditor and auditor/technical specialists have completed a significant number of environmental site assessments, environmental management, and site audits on similar sites as identified in Attachment A.

Should you have any queries or wish to discuss any points, please do not hesitate to contact the undersigned.

Yours sincerely,

**Rebeka Hall**  
**Independent Environmental Auditor/ Exemplar Global AU (ISO 19011:2018) (No. 7090818-5136510)**  
**Zoic Environmental Pty Ltd**

Attachments:      Attachment A – Qualifications and Experience



## Attachment A. Qualifications and Experience

Name	Role
Rebeka Hall	Lead Environmental Auditor <ul style="list-style-type: none"><li>• Exemplar Global AU (ISO 19011:2018) (No. 7090575-5136510)</li><li>• NSW EPA Accredited Site Auditor (under Contaminated Land Management Act) (No. 0802)</li><li>• Certified Environmental Practitioner (General) EIANZ (No. 889)</li><li>• Certified Environmental Practitioner (Site Contamination Specialist) EIANZ (No. SC40913)</li><li>• BEnvSci (Hons) (Geology)</li></ul>
Kylie Lloyd	Alternate Lead Environmental Auditor <ul style="list-style-type: none"><li>• Exemplar Global AU (ISO 19011:2018) (No. 7090818-5136511)</li><li>• NSW EPA Accredited Site Auditor (under Contaminated Land Management Act) (No. 0302)</li><li>• Certified Environmental Practitioner (General) EIANZ (No. 895)</li><li>• Certified Environmental Practitioner (Site Contamination Specialist) EIANZ (No. SC40914)</li><li>• BSc (Biological Sciences)</li><li>• MPH (Environmental Health)</li><li>• MA Medical Sciences</li></ul>
Peter Moore	Auditor /Auditor Technical Specialist <ul style="list-style-type: none"><li>• Certified Environmental Practitioner (Site Contamination Specialist) EIANZ (No. SC41043)</li><li>• BE (Civil)</li><li>• Chartered Professional Engineer CP Eng</li></ul>
Dr Cheryl Halim	Auditor /Auditor Technical Specialist <ul style="list-style-type: none"><li>• BE (Chemical)</li><li>• PhD (Chemical Engineering)</li></ul>
Jack Braithwaite	Auditor /Auditor Technical Specialist <ul style="list-style-type: none"><li>• BSc (Environmental)</li></ul>



Experience on relevant sites are as follows:

- Specialist Site Audit of the Shore School, North Sydney
- Specialist Site Audit of the Fairvale High School, Fairfield West
- Specialist Site Audit of the Parramatta Public School and Arthur Phillip High School, Parramatta
- Specialist Site Audit of the Alexandria Park Preschool and School, Alexandria
- Specialist Site Audit of the Alex Avenue Public School
- Specialist Site Audit of the Jordan Springs Public School
- Specialist Site Audit of the Waitara Public School
- Specialist Site Audit of the Sydney University expansion
- Specialist Site Audit of Iglu Redfern 2 on 80-88 Regent St, Redfern NSW

Additional information can be provided, if required.

ZOIC Environmental Pty Ltd  
ABN 23 154 745 525  
Suite 1, Level 9  
189 Kent Street Sydney 2000  
Phone: +61 2 9251 8070  
[www.zoic.com.au](http://www.zoic.com.au)

5 November 2019

19256 L3 SOI 5Nov2019.docx

Department of Planning and Environment  
c/o Michael Nasiry  
EPM Projects Pty Ltd  
Level 2, 146 Arthur Street  
North Sydney NSW 2060

Via email: [mnasiry@epmprojects.com.au](mailto:mnasiry@epmprojects.com.au)

Dear Sir/Madam,

**Re: Statement of Independence**

Zoic Environmental Pty Ltd (ZOIC) has been engaged by the Cranbrook School to conduct an Independent Environmental Audit to meet Conditions D31 to D36 of State Significant Development (SSD) No. 8812. The proposed Audit team comprises Rebeka Hall, Kylie Lloyd, Peter Moore, Cheryl Halim and Jack Braithwaite who are all employees of ZOIC.

As required by Section 3.1.2 of the Independent Audit PAR (June 2018) the Lead Auditor and members of the Audit team confirm that we are acting independently in providing these services and that we:

1. Are not related to any proponent, owner, operator or other entity involved in the delivery of the project.
2. Have no any pecuniary interest in the project, proponent or related entities.
3. Have not provided services (not including independent reviews or auditing) to the project with the result that they audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;
4. Are not an Environmental Representative for the project;
5. Have not and will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.

Should you have any queries please do not hesitate to contact the undersigned.

Yours sincerely,



**Rebeka Hall**  
Lead Auditor  
NSW EPA Accredited Site Auditor (0802)  
Exemplar Global AU (ISO 19011:2018) (No. 7090818-5136510)  
Certified Environmental Practitioner (ELANZ)  
Zoic Environmental Pty Ltd



Contact: Laura Papoulias  
Phone: 02 8289 6879  
Email: [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Michael Nasiry  
Project Manager  
EPM Projects Pty Ltd  
Level 2, 146 Arthur Street  
NORTH SYDNEY NSW 2060

14 November 2019

Email: [mnasiry@epmprojects.com.au](mailto:mnasiry@epmprojects.com.au)

**Cranbrook School Redevelopment (SSD\_8812)  
2019 IEA Auditor Approval**

Dear Michael,

I refer to your email correspondence dated 28 October 2019, 31 October 2019, 6 November 2019 and 13 November 2019 seeking the agreement of the Planning Secretary of the Department of Planning, Industry and Environment (**Department**) of the suitability of Ms Rebeka Hall to undertake an independent environmental audit (**IEA**) of the Cranbrook School Redevelopment.

In accordance with Condition D31 of SSD 8812 and the *Independent Audit Post Approval Requirements* dated June 2018 (**Guideline**), the Department has reviewed your request and considers Ms Hall is suitably qualified and experienced to undertake the audit as the principal auditor and has approved Ms Kylie Lloyd as suitably qualified and experienced to undertake the audit as alternate principal auditor. Mr Peter Moore, Dr Cheryl Haim and Mr Jack Braithwaite are also approved to assist Ms Hall during the audit. Please note this approval is conditional upon Ms Hall, Ms Lloyd, Mr Moore, Dr Haim and Mr Braithwaite being independent from the project.

The IEA must be prepared, undertaken and finalised in accordance with the Guideline.

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

Yours sincerely,

Chris Mathieson  
**Team Leader – Compliance**  
as the Secretary's nominee



## Cheryl Halim

---

**From:** David Somerville <SomervilleD@richardcrookes.com.au>  
**Sent:** Monday, February 10, 2020 8:38 AM  
**To:** Cheryl Halim  
**Cc:** Rebeka Hall; Gregg Armstrong; Lara Saleh  
**Subject:** RE: 19256 Updated Audit Table

Hi Cheryl,

Richard Crookes can confirm the following;

Zoic No.	RCC Note
Z25, Z27, Z28, Z30	RCC confirm that there has been no incidents or non-compliance's on site to date.
Z31	RCC confirm that there has been no revisions to any Construction Plans to date
Z50, Z234	RCC confirm that there has been no unexpected contamination finds to date
Z105, Z106	RCC confirm that there has been no unexpected heritage finds to date
Z116, Z117, Z118, Z119	RCC confirm that there has been no incidents on site to date.
Z167	RCC confirm that no unexpected finds have been encountered to date.
Z173, Z175	RCC confirms that there has been zero near misses, injuries or incidents to date in regards to wet weather.
Z207	RCC confirms there has been zero incidents or non-compliances in regards to asbestos.

We will follow up in the coming days for other confirmation documents to help closing out the audit report.

Regards,

David Somerville, Senior Project Engineer

**RICHARD CROOKES**  
  
**CONSTRUCTIONS**

Direct 02 9902 4700 | Fax 02 9439 1114 | Mobile 0419 644 721  
Level 3, 4 Broadcast Way, Artarmon NSW 2064  
[www.richardcrookes.com.au](http://www.richardcrookes.com.au)



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**From:** Cheryl Halim <cheryl.halim@zoic.com.au>  
**Sent:** Thursday, 6 February 2020 6:26 AM  
**To:** David Somerville <SomervilleD@richardcrookes.com.au>  
**Subject:** 19256 Updated Audit Table

Hi David,

Please find attached the Audit Table. Please provide information in the yellow cells (this is as of yesterday. I will email you updated one once I review your emails)..

Thank you.

Kind regards,

**Dr Cheryl Halim**

Senior Environmental Engineer



**ZOIC Environmental Pty Ltd**

A: Suite 1, Level 9, 189 Kent Street, Sydney NSW 2000

P: 02 9251 8070

M: 0430 013 246

[www.zoic.com.au](http://www.zoic.com.au)

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## Cheryl Halim

---

**From:** Michael Nasiry <mnasiry@epmprojects.com.au>  
**Sent:** Friday, March 6, 2020 10:39 AM  
**To:** Cheryl Halim; Rebeka Hall  
**Cc:** Cranbrook Stage 2 Development Project (1806AB@projects.infopoint.com.au); Todd Ewart; Matthew Alder; Natalie Cook  
**Subject:** FW: Cranbrook School Redevelopment - Post Approval Document Received - (SSD-8812-PA-8)  
**Attachments:** ..datacontent\magertel\images\New\_DPIE\_Logo1561956956365.png

Hi Cheryl & Rebeka,

Please see below email below from DPI&E's major portal website acknowledging submission of the Independent Audit Report.

We have received RCC's response to your audit and will upload to the portal and issue a copy for ZOIC's information and reference.

Yours sincerely,



**Michael Nasiry**  
Project Manager

EPM Projects Pty Ltd  
Level 2, 146 Arthur Street, North Sydney NSW 2060  
M 0434 484 346  
T 61 2 9452 8300  
W [epmprojects.com.au](http://epmprojects.com.au)



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**From:** no-reply@majorprojects.planning.nsw.gov.au <no-reply@majorprojects.planning.nsw.gov.au>  
**Sent:** Friday, 6 March 2020 10:37 AM  
**To:** Michael Nasiry <mnasiry@epmprojects.com.au>  
**Cc:** Michael Nasiry <mnasiry@epmprojects.com.au>  
**Subject:** Cranbrook School Redevelopment - Post Approval Document Received - (SSD-8812-PA-8)

Dear Michael ,

Thank-you, your post approval document in relation to the Cranbrook School Redevelopment has been received by the Department.

You can view the details of the document in your profile.

To sign in to your account click [here](#) or visit the Major Projects Website.  
Please do not reply to this email.

Kind regards

Department of Planning, Industry and Environment



**Planning,  
Industry &  
Environment**

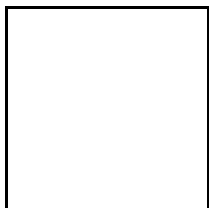
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## Cheryl Halim

---

**From:** Michael Nasiry <mnasiry@epmprojects.com.au>  
**Sent:** Thursday, July 2, 2020 12:56 PM  
**To:** Cheryl Halim; Natalie Cook  
**Cc:** Rebeka Hall; Jack Braithwaite; Cranbrook Stage 2 Development Project (1806AB@projects.infopoint.com.au); Todd Ewart; Matthew Alder  
**Subject:** RE: 19256 Second Audit for Cranbrook School

Hi Cheryl,

As discussed earlier, EPM and Cranbrook do not have any major concerns regarding the environmental measures being implemented by RCC. Some minor site observations have been made and notified to RCC regarding sediment control, dust and road cleanliness upon our regular site visits. RCC have been receptive to EPM and Cranbrook's feedback and have proactively addressed any concerns raised. All other construction phase feedback is included in Section D of the Compliance Audit Report Table – Construction 01 dated 19/06/20 prepared by EPM. I sent the Compliance Report to you via InfoPoint this morning.

Yours sincerely,



**Michael Nasiry**  
Project Manager

EPM Projects Pty Ltd  
Level 2, 146 Arthur Street, North Sydney NSW 2060  
**M** 0434 484 346  
**T** 61 2 9452 8300  
**W** [epmprojects.com.au](http://epmprojects.com.au)



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---

**From:** Cheryl Halim <cheryl.halim@zoic.com.au>  
**Sent:** Wednesday, 1 July 2020 8:17 AM  
**To:** Michael Nasiry <mnasiry@epmprojects.com.au>; Natalie Cook <ncook@cranbrook.nsw.edu.au>  
**Cc:** Rebeka Hall <rebeka.hall@zoic.com.au>; Jack Braithwaite <jack.braithwaite@zoic.com.au>; Cranbrook Stage 2 Development Project (1806AB@projects.infopoint.com.au) <1806AB@projects.infopoint.com.au>; Todd Ewart <tewart@epmprojects.com.au>; Matthew Alder <malder@epmprojects.com.au>  
**Subject:** RE: 19256 Second Audit for Cranbrook School

Hi Michael,

We are after a general feedback, so there is no template – basically if have any concerns with any environmental measures that Richard Crookes is performing during this Audit period.

Can you please provide that compliance audit, as that is part of the items we need to assess.

Thank you.

Kind regards,  
**Dr Cheryl Halim**  
Senior Environmental Engineer

**ZOIC Environmental Pty Ltd**

A: Suite 1, Level 9, 189 Kent Street, Sydney NSW 2000

P: 02 9251 8070

M: 0430 013 246

[www.zoic.com.au](http://www.zoic.com.au)

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**From:** Michael Nasiry <[mnasiry@epmprojects.com.au](mailto:mnasiry@epmprojects.com.au)>

**Sent:** Wednesday, July 1, 2020 8:01 AM

**To:** Cheryl Halim <[cheryl.halim@zoic.com.au](mailto:cheryl.halim@zoic.com.au)>; Natalie Cook <[ncook@cranbrook.nsw.edu.au](mailto:ncook@cranbrook.nsw.edu.au)>

**Cc:** Rebeka Hall <[rebeka.hall@zoic.com.au](mailto:rebeka.hall@zoic.com.au)>; Jack Braithwaite <[jack.braithwaite@zoic.com.au](mailto:jack.braithwaite@zoic.com.au)>; Cranbrook Stage 2 Development Project ([1806AB@projects.infopoint.com.au](mailto:1806AB@projects.infopoint.com.au)) <[1806AB@projects.infopoint.com.au](mailto:1806AB@projects.infopoint.com.au)>; Todd Ewart <[tewart@epmprojects.com.au](mailto:tewart@epmprojects.com.au)>; Matthew Alder <[malder@epmprojects.com.au](mailto:malder@epmprojects.com.au)>

**Subject:** RE: 19256 Second Audit for Cranbrook School

Hi Cheryl,

Thank you for your email.

Can you confirm if you are after a general response by email or whether there is a template that we can follow.

Also, I recently completed a Compliance Audit which generally covers all applicable conditions with comments and observations on environmental management. Would you like a copy of this document?

Yours sincerely,



**Michael Nasiry**  
Project Manager

EPM Projects Pty Ltd  
Level 2, 146 Arthur Street, North Sydney NSW 2060  
M 0434 484 346  
T 61 2 9452 8300  
W [epmprojects.com.au](http://epmprojects.com.au)



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**From:** Cheryl Halim <[cheryl.halim@zoic.com.au](mailto:cheryl.halim@zoic.com.au)>

**Sent:** Wednesday, 1 July 2020 7:39 AM

**To:** Michael Nasiry <[mnasiry@epmprojects.com.au](mailto:mnasiry@epmprojects.com.au)>; Natalie Cook <[ncook@cranbrook.nsw.edu.au](mailto:ncook@cranbrook.nsw.edu.au)>

**Cc:** Rebeka Hall <[rebeka.hall@zoic.com.au](mailto:rebeka.hall@zoic.com.au)>; Jack Braithwaite <[jack.braithwaite@zoic.com.au](mailto:jack.braithwaite@zoic.com.au)>

**Subject:** 19256 Second Audit for Cranbrook School

Good morning Michael and Natalie

Thank you for joining us for the opening meeting yesterday. We completed the site visit and currently updating the Audit Table on the outcomes of the site visit, as well as additional items provided by Richard Crookes.

As part of the Audit, we need to engage with you on whether you have any comments with the environmental practices onsite during this Audit period. We previously did this by conducting interview with Michael Prizac onsite, but we understand that he is no longer onsite.

Can you please provide your comments and/or concerns (if any) by next week for inclusion in the audit report?

Thank you.

Kind regards,  
**Dr Cheryl Halim**  
Senior Environmental Engineer



**ZOIC Environmental Pty Ltd**

A: Suite 1, Level 9, 189 Kent Street, Sydney NSW 2000

P: 02 9251 8070

M: 0430 013 246

[www.zoic.com.au](http://www.zoic.com.au)

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## Cheryl Halim

---

**From:** Hala Fua <Hala.Fua@planning.nsw.gov.au>  
**Sent:** Wednesday, September 9, 2020 1:36 PM  
**To:** mnasiry@epmprojects.com.au  
**Cc:** Gregg Armstrong; Rebeka Hall; Cheryl Halim  
**Subject:** DPIE Review of SSD 8812 IEA no. 2

Hi Michael,

I called your number today but you were unavailable to answer.

My call relates to Independent Environmental Audit (IEA) no. 2 dated 21 July 2020 prepared by Zoic Environmental Pty Ltd (reference 19256 R3) in accordance with Condition D34, Part D, Schedule 2 of Development Consent no. SSD 8812 (Consent) which authorises the alternations and additions to Cranbrook School situated at 5 Victoria Road, Bellevue Hill. You are listed as the primary contact.

Condition D34 relevantly states:

*"Independent Audits of the development must be carried out in accordance with:*

- (a) The Independent Audit Program submitted to the Department and the Principal Certifying Authority under condition D32 of this consent; and*
- (b) The requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018) [PAR 18]."*

My review of the IEA against the reporting requirement of Condition D34(b) revealed that:

1. The IEA is not in accordance with Section 3.2 of PAR 18 which requires the auditor to consult with the Department, and other agencies & stakeholders regarding their input about the audit scope. The IEA indicates that only EPM and Richard Crookes were asked to provide feedback, and that a desktop review of EIS, RTS & other documents was carried out. Please ensure that consultation with all required parties regarding scope development as per Section 3.2 of PAR 18 is undertaken for future IEA's.
2. The IEA is not in accordance with Section 3.8 of PAR 18. There are a number of consent conditions in the Audit Table to Appendix F of the IEA that have not been audited because they were determined as "Not Triggered". However, the Department considers that several of these "Not Triggered" conditions should have been assessed. The reason for the use of "Not Triggered" is listed in the "Evidence Collected/Observations" column as either "Note only", "Not relevant to Environmental Audit" or no comment is provided at all. I refer to the definition for "Not Triggered" which provides "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". Where a consent condition does not meet this definition, an audit of compliance must be undertaken. Therefore, the Department requests that IEA no. 2 be revised to comply with Section 3.8 by reviewing all "Not Triggered" conditions for the purpose of identifying whether "Not Triggered" is the appropriate compliance status descriptor. If it is determined that "Not Triggered" is not applicable to a particular condition, then please audit that requirement. The revised IEA must be resubmitted to the Department via the Major Projects Portal by COB 23 September 2020. If an extension of time is required to submit the revised IEA, then please contact me.

If you'd like to discuss this email further, please call me.

Regards,

**Hala Fua**  
**Senior Compliance Officer**

Planning & Assessment | Department of Planning, Industry and Environment  
**T** (02) 8837 6328 | **E** [hala.fua@planning.nsw.gov.au](mailto:hala.fua@planning.nsw.gov.au)  
Locked Bag 5022 | PARRAMATTA NSW 2124  
[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)





*The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

*If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).*

*The Department has recently upgraded the Major Projects Website to improve the timeliness and transparency of its post approval and compliance functions. As part of this upgrade, proponents are now requested to submit all post approval and compliance documents online, via the Major Projects Website. To do this, please refer to the instructions available [here](#).*



## Appendix D Record of Meeting and Agenda

ZOIC Environmental Pty Ltd  
 ABN 23 154 745 525  
 Suite 1, Level 9  
 189 Kent Street Sydney 2000  
 Phone: +61 2 9251 8070  
[www.zoic.com.au](http://www.zoic.com.au)

19256 L5 Opening Meeting Agenda Second Audit.docx

## Independent Environmental Audit – Opening Meeting Agenda

**Site:** Cranbrook School  
**SSD:** 8812  
**Date & Time:** 30 June 2020, 9:30am


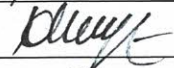

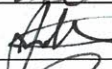
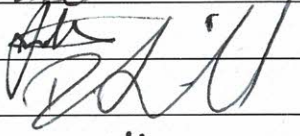
### Invitees:

Rebeka Hall (Zoic)	Cheryl Halim (Zoic)	Jack Braithwaite (Zoic)
Michael Nasiry (EPM)	Andrew Gulliford (Richard Crookes)	Todd Ewart (EPM)
Natalie Cook (Cranbrook School)	David Somerville (Richard Crookes)	Lara Saleh (Richard Crookes)
Gregg Armstrong (Richard Crookes)		

### AGENDA

1. Introductions
  - a. Purpose and Objective of Audit
  - b. Scope of Audit (boundary, activities, processes)
  - c. Criteria for Audit (SSD Conditions, CEMP commitments)
2. Audit Methodology
  - a. Re-cap initial Audits key findings
  - b. Timing – site based/desktop based
  - c. Evidence based (record and observation)
  - d. Recording of observations (notes, photographs, discussions)
  - e. Any site limitation, cultural, religious or social sensitivities
3. Reporting
  - a. Method (at time of observation, closing meeting (recap next day, formal report)
  - b. Grading – Compliant, Non-Compliant, Not Triggered, Recommendations
  - c. Post Audit opportunity to respond prior to Final Report
4. Close out meeting – Thu 2 July

Independent Environmental Audit – Opening Meeting Attendance Sheet

Date	Attendee & Company	Signature
30/6/20	Rebeka Hall-Zoic	
30/6/20	Cheryl Hakim-Zoic	
30/6/20	Jack Braithwaite-Zoic	
30/6/20	Andrew Culliford	
30/6/20	David Somerville	
30/6/20	Michael Nasiry - EPM	online
30/6/20	Natalie Cook - Cranbrook School	online

## Cheryl Halim

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**From:** Cheryl Halim  
**Sent:** Thursday, July 2, 2020 1:10 PM  
**To:** 'Michael Nasiry'; David Somerville; Cranbrook Stage 2 Development Project (1806AB@projects.infopoint.com.au); Todd Ewart; Matthew Alder; Lara Saleh; Gregg Armstrong; Natalie Cook; Andrew Gulliford  
**Cc:** Jack Braithwaite; Rebeka Hall  
**Subject:** 19256 Close out Meeting - Summary of Findings for Second IEA Cranbrook School Stage 2 Redevelopment  
**Attachments:** Appendix F. 19256 Audit Table.xlsx

Dear All,

Thank you to the representatives from Cranbrook School, EPM and Richard Crookes Constructions (RCC) for attending our Opening Meeting for the second Independent Environmental Audit (IEA) conducted on Tuesday 30 June 2020.

The IEA was to assess compliance to SSD conditions pertaining to the construction phase, and to assess environmental performance and compliance with the project's approved CEMP and subplans.

We thank RCC for accommodating our site visit and providing requested project records prior to the site visit which expedited the audit process.

This email serves as our Close Out meeting to the IEA, providing a summary of our findings and items to be closed out prior to Zoic issuing the draft IEA report.

### 1. Summary of IEA scope

During the site visit, Zoic observed and made record of environmental management and controls implemented during construction activities.

Interviews were conducted with key Richard Crookes Constructions (RCC) representatives regarding site practices to complete the Audit Table included in the project's Audit Program.

Relevant conditions/actions were assessed against the following criteria:

- Compliant
- Non-compliant
- Non-triggered

The current IEA revisited 8 non-compliances and areas for improvement raised in the Initial IEA (February 2020)

### 2. Findings - Identified Strengths

All items raised as non-compliances/areas for improvement in the initial Audit (February 2020) have been rectified and are now compliant.

RCC has a very organised system and robust record keeping, which greatly assisted the completion of the audit. During the site audit, RCC demonstrated a proactive approach to environmental management and is amenable to suggestions on improvement.

### 3. Findings - Potential non-compliances and opportunities for improvement

Zoic identified the following potential non-compliances / opportunities for improvements but seek further information from RCC prior to finalising our assessment:

- Item Z30: This condition requires the review of plans within 3 months of the Independent Audit. We understand this has not occurred yet. However, as the initial audit was only conducted within 1-2 months of construction works commencing, we are of the opinion that the requirements outlined in

each Plan may not have been required and therefore implemented. It was communicated to Zoic on 30 June 2020 that the review of plans is scheduled within the next month. RCC to confirm.

- Item Z108: Can RCC please provide material tracking for VENM disposal (e.g. truck register or material tracking).
- Item Z127: It is recommended that the safety barriers are placed at the main truck entrance to block pedestrian access in front of the main construction gate. During the inspection, a barrier was placed in parallel with the footpath still allowing access.
- Item Z140: please provide a clearance certificate (even partial if available) for the removal of the slab in the southern part of site. This should be provided by a Licensed Asbestos Assessor. As part of slab is yet to be removed we can reassess this requirement during the next Audit if there is no clearance available at this point in time.
- Item Z229: The Auditor's noted damage to kerb on Rose Bay Avenue, across from the main truck site access. Please clarify the cause of this incident. Record of this occurrence if associated with site activities should be provided to Zoic.
- Item Z230: RCC to confirm that the onsite vehicle maintenance area (located below the score board) is lined with geotextile to capture any potential impact. Please outline how any impacted water/fuel loss is contained so to not seep into the underlying natural sand.
- Item Z233: Can RCC please provide a sample of an environmental inspection conducted after rain.

The above are outlined in yellow in the attached table. We seek clarification from RCC to the items above by 10 July 2020 (if not earlier).

#### 4. Status of Review and Timing.

Our aim is to issue the Draft IEA Report by 13 July 2020.

RCC and EPM will have an opportunity to provide additional information and rectify any potential non-compliances by 16 July 2020.

After which we will issue our final report.

Thank you for your time.

Please don't hesitate to contact Rebeka or myself if you have any questions.

Sent on behalf of Rebeka Hall, Lead Auditor.

Kind regards,

**Dr Cheryl Halim**

Senior Environmental Engineer



#### **ZOIC Environmental Pty Ltd**

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## Appendix E Photographs



## Photograph Log

Client Name:


Cranbrook School

Site Location:

5 Victoria Road, Bellevue Hill  
NSW

Project Number:

19256

Zoic Ref.:  Z80, Z143, Z211	Date:  30/6/2/2020	
Description: Site notices observed on perimeter fencing		

Zoic Ref.:  Z92, Z136, Z143	Date:  30/6/2020	
Description:  Hoarding around the site boundary.		





## Photograph Log

Client Name:

Cranbrook School

Site Location:

5 Victoria Road, Bellevue Hill  
NSW

Project Number:

19256

Zoic Ref.:	Date:	
Z100, Z101, Z136, Z166	30/6/2020	
Description:		
Evidence of water cart.		
Geofabric placed in non-work area.		
Vehicle wash down bay and stabilised site entrance/exit.		



## Photograph Log

Client Name:

Cranbrook School

Site Location:

5 Victoria Road, Bellevue Hill  
NSW

Project Number:

19256

Zoic Ref.: Z107, Z138, Z165	Date: 30/6/2020	
Description:  Waste segregation and storage, stockpile construction. No cover was placed on stockpile as the stockpile was continuously transported for offsite disposal.		

Zoic Ref.:  Z109	Date:  30/6/2020	
Description:  Concrete stockpiled for offsite disposal.		



## Photograph Log

Client Name:


Cranbrook School

Site Location:

5 Victoria Road, Bellevue Hill  
NSW

Project Number:

19256

Zoic Ref.:	Date:	
Z126, Z228	30/6/2020	
Description:		
Traffic plan signage on Rose Bay Ave.		

Zoic Ref.:	Date:	
Z126, Z127	30/6/2020, 8 /7/2020	
<p>Description: Barrier at Rose Bay Ave and New South Head Road junction.</p> <p>Second photo (8/7/2020) was provided by RCC, which indicated pedestrian barriers installed at the main gate.</p> 		





## Photograph Log

Client Name:

Cranbrook School

Site Location:

5 Victoria Road, Bellevue Hill  
NSW

Project Number:

19256

Zoic Ref.:  Z141	Date:  30/6/2020	
Description:  Fencing and signage of tree protection zones.		



## Photograph Log

Client Name:


Cranbrook School

Site Location:

5 Victoria Road, Bellevue Hill  
NSW

Project Number:

19256

Zoic Ref.:	Date:	
Z144, Z172	30/6/2020	
Description:		
Mulching along northern boundary.		
Sausage bunds on kerbside inlets.		



## Photograph Log

Client Name:

Cranbrook School

Site Location:

5 Victoria Road, Bellevue Hill  
NSW

Project Number:

19256

Zoic Ref.:	Date:	
Z172	30/6/2020	
Description:		
Chemical storage placed on bunding. Spill located adjacent to yellow container.		

Zoic Ref.:	Date:	
Z210	30/6/2020	
Description:		
Fencing around excavation.		



## Appendix F Audit Table

						2nd Audit (Rev)				
Zoic No.	Document	SSD Condition / CEMP Section	Category	Item	Condition	Evidence Collected / Observations	Comments on Independent Audit Findings and Recommendations	Compliance Status		
								Compliant	Non-Compliant	Not Triggered
REVIEW OF SSD COMPLIANCE										
Part A Administrative Conditions										
Z1	SSD	A1	Admin	Obligation to Minimise Harm to the Environment	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development.	11/09/2020 Record sighted: - Richard Crookes Constructions (RCC) (12 Nov 2019), Construction Environmental Management Plan (CEMP) - Cranbrook Stage 2 Redevelopment Project 5 Victoria Avenue, Bellevue Hill and sub-plans have been adequately implemented (see Items Z158-Z237).				
Z2	SSD	A2	Admin	Terms of Consent	The development may only be carried out: a. in compliance with the conditions of this consent; b. in accordance with all written directions of the Planning Secretary; c. generally in accordance with the EIS and Response to Submissions; d. in accordance with the approved plans in the table below: (Refer to attached DP&E Conditions of Consent for Document List)	a. Conditions in this consent were met, as assessed during this audit. b and d. 17/09/20 Record sighted: RCC Memorandum 'Item A21 Access to Information' dated 21 November 2019 confirming the development may only be carried out with the conditions stated and the approved plans listed. c. Compliance assessed as part of this audit. No non-compliances identified.				
Z3	SSD	A3	Admin	Terms of Consent (continued)	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: a. the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and b. the implementation of any actions or measures contained in any such document referred to in (a) above.	This revised IEA report is in response to an E-mail from DPIE (9 September 2020) requesting an amendment of the IEA report to include items previously idnetified as non-triggered. RCC confirm in email dated 17/09/20 that, to the best of their knowledge, they have not been issued with any written direction from the Planning Secretary on the Cranbrook Redevelopment Project to date.				
Z4	SSD	A4	Admin	Terms of Consent (continued)	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	No inconsistencies, ambiguity or conflict in conditions and directions observed.				
Z5	SSD	A5	Admin	Limits of Consent	This consent lapses five years after the date of consent unless the works associated with the development have physically commenced.	Development commenced in December 2019, SSD was issued on 13 September 2019 therefore within 5 years of consent.				
Z6	SSD	A6	Admin	Prescribed Conditions	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	17/9/2020 Record sighted: ARUP letter dated 22 November 2019 'Cranbrook School - Centenary Building and the Aquatic Fitness Centre developments - Structural Design Certificate' stating that the prepared plans for the development in accordance with Australian Standards and the Building Code of Australia.				
Z7	SSD	A7	Admin	Planning Secretary as Moderator	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.	18/9/20: EPM advised that there have been no disputes between Cranbrook School and a public authority.				



Zoic No.	Document	SSD Condition / CEMP Section	Category	Item	Condition	Evidence Collected / Observations	Comments on Independent Audit Findings and Recommendations	Compliance Status		
								Compliant	Non-Compliant	Not Triggered
Z8	SSD	A8	Consultation	Evidence of Consultation	Where conditions of this consent require consultation with an identified party, the Applicant must: a. consult with the relevant party prior to submitting the subject document for information or approval; and b. provide details of the consultation undertaken including: c. the outcome of that consultation, matters resolved and unresolved; and d. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	a. Consultation conducted to meet Conditions C4, C13, C16, C30, D26. The following documents were prepared in consultation with the relevant agencies: - C4- Pre-Construction Dilapidation & Photographic Survey of RMS Infrastructure in Rose Bay Avenue and New South Head Road provided. Email submission for Council was sighted. RCC confirmed that Telstra have attended site and correspondence has occurred with Ausgrid. - C13 - CTMP (Appendix C of CEMP) has been approved by TfNSW on 10 December 2019 and by Woollahra Council in an email dated 26 November 2019. Evidence of consultation with RMS sighted. - C16 - Woollahra Municipal Council letter dated 2 December 2019 stating that the Construction Soil and Water Management Plan satisfies Condition C16 of this SSD. - C30 - RCC consulted with Woollahra Municipal Council between 26/11/19 – 16/12/19 and arranged for amended plans to Council's satisfaction. The amended plans were subsequently issued to the PCA prior to CCI. - D26 - No Aboriginal objects uncovered since last Audit.  b, c, d. Details of consultation discussed in the review of the above conditions.				
Z9	SSD	A9	Admin	Staging	The SSD may be constructed and operated in stages. Where staged construction or operation is proposed, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the Planning Secretary for information. 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.	30/06/2020 Record sighted: - RCC email correspondence confirming that no staging of the works is planned.				
Z10	SSD	A10	Admin	Staging (continued)	The Staging Report, prepared in accordance with Condition A9 must: a. if staged construction is proposed, set out how the construction of the whole of the SSD will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; b. if staged operation is proposed, set out how the operation of the whole of the SSD 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); c. specify how compliance with conditions will be achieved across and between each of the stages of the SSD; and d. set out mechanisms for managing any cumulative impacts arising from the proposed staging.	30/06/2020 Record sighted: - RCC email correspondence confirming that no staging of the works is planned.				
Z11	SSD	A11	Admin	Staging (continued)	The SSD must be staged in accordance with the Staging Report, as submitted to the Planning Secretary.	30/06/2020 Record sighted: - RCC email correspondence confirming that no staging of the works is planned.				
Z12	SSD	A12	Admin	Staging (continued)	Where staging is proposed, the terms of this approval 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	30/06/2020 Record sighted: - RCC email correspondence confirming that no staging of the works is planned.				

Zoic No.	Document	SSD Condition / CEMP Section	Category	Item	Condition	Evidence Collected / Observations	Comments on Independent Audit Findings and Recommendations	Compliance Status		
								Compliant	Non-Compliant	Not Triggered
Z13	SSD	A13	Admin	Staging, Combining and Updating Strategies, Plans or Programs	With the approval of the Planning Secretary, the Applicant may: a. prepare and submit any strategy, 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 or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); b. combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and c. update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	30/06/2020 Record sighted: - RCC email correspondence confirming that no staging of the works is planned.				
Z14	SSD	A14	Admin	Staging, Combining and Updating Strategies, Plans or Programs (continued)	If the Planning Secretary agrees, a strategy, 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.	30/06/2020 Record sighted: - RCC email correspondence confirming that no staging of the works is planned.				
Z15	SSD	A15	Admin	Staging, Combining and Updating Strategies, Plans or Programs (continued)	If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.	RCC confirmed in email dated 17/09/20 that they have not revised any strategies or plans on the Cranbrook Redevelopment project to date. Some plans (CTMP, CNVMP etc.) are currently under review however these reviews are not complete at the time of the RCC statement, or this Audit. To be re-evaluated at next audit.				
Z16	SSD	A16	Building	Structural Adequacy	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. Notes: • Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	17/09/20 Record sighted: ARUP (22 November 2019) 'Cranbrook School - Centenary Building and the Aquatic and Fitness Centre developments - Structural Design Certificate' stating that the prepared plans, specification and other drawings for th Project have been prepared in accordance with the relevant Australian Standards and Codes of Practice and The Building Code of Australia.				
Z17	SSD	A17	Building	External Walls and Cladding	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	Letter from Architectus (13 November 2019) Cranbrook School Stage 2 Redevelopment Flammability of Facades reviewed, which states that the proposed products and systems meet the requirements of conditions A17 and B4, subject to final product confirmation with the contractor and that the building was designed under BCA 2016 Amendment 1.				
Z18	SSD	A18	Admin	Applicability of Guidelines	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.	References in reports were reviewed at the date of the consent.				
Z19	SSD	A19	Admin	Applicability of Guidelines (continued)	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.	It is noted that the Planning Secretary has not requested compliance with an updated or revised guideline, protocol, standard or policy. It is also noted that the Independent Audit Post Approval Requirements were updated since the date of consent and the proponent has the option to implement the previous or the current guideline. At the time of the Second Audit, no decision had been made regarding this item. This does not affect the current Audit.				

Zoic No.	Document	SSD Condition / CEMP Section	Category	Item	Condition	Evidence Collected / Observations	Comments on Independent Audit Findings and Recommendations	Compliance Status		
								Compliant	Non-Compliant	Not Triggered
Z20	SSD	A20	Admin	Monitoring and Environmental Audits	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, noncompliance notification, compliance reporting and independent auditing. Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.	Noted, reviewed in relevant items and were considered to be compliant.				
Z21	SSD	A21	Admin	Access to Information	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: a. make the following information and documents (as they are obtained or approved) publicly available on its website: i. the documents referred to in condition A2 of this consent; ii. all current statutory approvals for the development; iii. all approved strategies, plans and programs required under the conditions of this consent; iv. regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent; v. a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; vi. a summary of the current stage and progress of the development; vii. contact details to enquire about the development or to make a complaint; viii. a complaints register, updated monthly; ix. audit reports prepared as part of any independent environmental audit of the development and the Applicant's response to the recommendations in any audit report; x. any other matter required by the Planning Secretary; and b. Keep such information up to date, to the satisfaction of the Planning Secretary.	a. The following documents were sighted on the project website (https://www.cranbrook.nsw.edu.au/about/future-cranbrook.aspx) i. - Architectural and landscape plans as per Section A2. Selected plans sighted. - A link to the Major Portal website with EIS and RTS provided. ii. SSD 8812 Assessment and Notice of Decision. iii.- Richard Crooks Constructions (12 November 2019) Cranbrook Stage 2 Redevelopment Project 5 Victoria Avenue, Bellevue Hill Construction Environmental Management Plan (CEMP). - PTC (13 November 2019) Construction Traffic Management Plan Cranbrook School, Bellevue Hill. - Acoustic Logic (1 November 2019) Cranbrook School Redevelopment Construction Noise and Vibration Management Plan. - RCC (21 October 2019) Cranbrook School Stage 2 Redevelopment 5 Victoria Avenue, Bellevue Hill Construction Waste Management Plan. - SCP (30 October 2019) Construction Soil and Water Management Plan Cranbrook School, Bellevue Hill. - SCP (25 October 2019) Flood Emergency Response Plan. - Unexpected Finds Protocol for Contamination - Unexpected Finds Protocol for Aboriginal & Non-Aboriginal Heritage (Appendix I of CEMP) iv. The website provides a link to the Compliance Report and Independent Environmental Audit reports which provide assessment of environmental performance and compliance to SSD conditions. v. The website provides a link to the Compliance Report and Independent Environmental Audit reports which provide assessment of monitoring results. vi. Progress summary provided. vii. Contact details provided via Cranbrook@cranbrook.nsw.edu.au or (02) 9327 9000. viii. Complaints register provided. ix. Independent audit reports: 26/06/2020 Record Sighted: - Site Induction PowerPoint was observed with site requirements listed. - Site induction information which includes traffic access, TMP, site behaviour, public transport, car pooling opportunities, CEMP requirements, and tree protection zones among other items.				
Z22	SSD	A22	Admin	Compliance	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.					

Zoic No.	Document	SSD Conditio n / CEMP Section	Category	Item	Condition	Evidence Collected / Observations	Comments on Independent Audit Findings and Recommendations	Compliance Status		
								Compliant	Non-Compliant	Not Triggered
Z23	SSD	A23	Admin	Student Numbers	This consent does not approve any increase in student numbers above any existing consents restricting staff and/or student numbers on the site.	Noted. Not applicable for construction phase.				
Z24	SSD	A24	Building	Buildings and Structures	All buildings and structures (other than pedestrian footpath awnings), together with any improvements integral to the future use of the site are wholly within the freehold property (unlimited in height or depth), along the New South Head Road boundary.	30/6/2020: Observation: All buildings and structures were within the property boundary.				
Z25	SSD	A25	Admin	Incident Notification, Reporting and Response	The Department must be notified in writing to compliance@planning.nsw.gov.au 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.	Record sighted 26/06/2020: - Email from EPM (Client Project Manager) (17 April 2020) to RCC with contact details from DPIE regarding an Incident Report submitted. Email from DPIE appended from Erica Vandenhonert from Planning NSW. - Email from noreply@majorprojects.planning.nsw.gov.au (24 March 2020) confirming receipt of an incident notice identifying an excavation incident and linking to conditions Schedule A25 and 26 of the specified SSD number. - Notification of Potential Incident document prepared by RCC dated 24 March 2020 outlining the excavation incident that may have compromised the archaeological testing and salvage investigations. - Incident Report prepared by RCC dated 15 April 2020 outlined the incident and corrective actions.				
Z26	SSD	A26	Admin	Incident Notification, Reporting and Response	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 1.	Record sighted 26/06/2020: - Incident Report prepared by RCC dated 15 April 2020 outlined the summary of incident, outcomes of incident investigation, corrective actions taken and communication with relevant stakeholders.				
Z27	SSD	A27	Admin	Non-Compliance Notification	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance. The Principal Certifying Authority must also notify the Department in writing to compliance@planning.nsw.gov.au within seven days after they identify any non-compliance.	Record sighted 26/06/2020: - EPM (18 June 2020) Cranbrook School Redevelopment Project Construction Compliance Report (Revision D). This report concludes that there were no non-compliance.				

Zoic No.	Document	SSD Condition / CEMP Section	Category	Item	Condition	Evidence Collected / Observations	Comments on Independent Audit Findings and Recommendations	Compliance Status		
								Compliant	Non-Compliant	Not Triggered
Z28	SSD	A28	Admin	Non-Compliance Notification	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	Record sighted 26/06/2020: - EPM (18 June 2020) Cranbrook School Redevelopment Project Construction Compliance Report (Revision D). This report concludes that there were no non-compliance				
Z29	SSD	A29	Admin	Non-Compliance Notification	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Noted				
Z30	SSD	A30	Admin	Revision of Strategies, Plans and Programs	Within three months of: a. the submission of a compliance report under condition C25; b. the submission of an incident report under condition A25; c. the submission of an Independent Audit under condition D31; or d. the issue of a direction of the Planning Secretary under condition A3 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Department and the Principal Certifying Authority must be notified in writing that a review is being carried out.	Record sighted 30/06/2020: - RCC state that they are currently reviewing the implemented strategies in response to the incident that occurred in March and as required per Condition A30(b). - This condition requires the review of plans within 3 months of the Independent Audit. We understand this has not occurred yet. However, as the initial audit was only conducted within 1-2 months of construction works commencing, we are of the opinion that the requirements outlined in each Plan may not have been required and therefore implemented. It was communicated to Zoic on 30 June 2020 that the review of plans is scheduled within the next month.	Recommendation: Review of strategies and plans conducted within 3 months of the incident report and notification to DPIE and PCA be provided notifying the review. To be checked in the subsequent Audit.			
Z31	SSD	A31	Admin	Revision of Strategies, Plans and Programs	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Principal Certifying Authority. Where revisions are required, the revised document must be submitted to the Principal Certifying Authority for approval within six weeks of the review. 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.	No revision conducted to date. Review is to be conducted (see Item Z30).				
Z32	SSD	AN1	Admin	Advisory Notes	All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	No non-compliance identified on licences, permits, approvals and consents, as reviewed in specific conditions of consent and the CEMP and subplan requirements.				
Part B Prior to Issue of a Construction Certificate										
Z33	SSD	B1		Outdoor Lighting	All outdoor lighting within the site must comply with, where relevant, AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-1997 Control of the obtrusive effects of outdoor lighting. Details demonstrating compliance with these requirements must be submitted to the satisfaction of the Principal Certifying Authority prior to the issue of the relevant Construction Certificate.	17/09/20 Record sighted: Northrop Electrical Statement dated 24/10/19 states that the design is in accordance with normal engineering practice and meets the requirements of the Building Code of Austrlia, relevant Australian Standards including AS4282-1997 and relevant Developments Consent.				

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Z34	SSD	B2		Property Damage Security Bond	Prior to the issue of any construction certificate, a property damage security bond is to be paid to Council. Prior to payment Council can provide the value of the property damage security bond.	17/09/20 Record sighted: Property Damage Security Bond was paid by RCC to Woollahra Municipal Council on 21/11/19.				
Z35	SSD	B3		Development Contribution	Prior to the issue of any construction certificate, a Section 94A levy totalling \$1,106,490, is to be paid to Council in accordance with Section 7.12 of the EP&A Act and Schedule 1 of Woollahra Section 94A Development Contributions Plan 2011. Prior to payment Council can provide the value of the indexed levy.	17/09/20 Record sighted: Development Contributions was paid by Cranbrook to Woollahra Municipal Council on 6 December 2019.				
Z36	SSD	B4		External Walls and Cladding	Prior to the issue of any construction certificate, the Applicant must provide the Principal Certifying Authority 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 Principal Certifying Authority to the Planning Secretary within seven days after the Principal Certifying Authority accepts it.	Letter from Architectus (13 November 2019) Cranbrook School Stage 2 Redevelopment Flammability of Facades reviewed, which states that the proposed products and systems meet the requirements of conditions A17 and B4, subject to final product confirmation with the contractor and that the building was designed under BCA 2016 Amendment 1. The statement was issued to PCA on 15 November 2019 via ACONEX (RCC-GCOR-000002).				
Z37	SSD	B5		Stormwater Management System	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 satisfaction of the Principal Certifying Authority. The system must: a. be designed by a suitably qualified and experienced person(s); b. be generally in accordance with the conceptual design in the EIS; c. be in accordance with applicable Australian Standards; d. ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines;	Record sighted: AECOM Stormwater Management Compliance Statement issued on 8 November 2019 sighted. The statement was issued to PCA on 15 November 2019 via ACONEX (RCC-GCOR-000002).				
Z38	SSD	B6		Stormwater Management Plans	Prior to the issue of any Construction Certificate, plans and specifications required by Clause 13.9 of the Regulation, must include Water Sensitive Urban Design details and must have a general design in accordance with stormwater plans prepared by AECOM dated 13 September 2018 and the following amendments showing integrated water sensitive design: a. a rainwater/stormwater collection tank(s) (harvest tanks) sized to accommodate the irrigation and water re-use demand of the site. A rainwater re-use plan must be prepared and certified by a suitably qualified and experienced person(s); b. a stormwater management system that continually manages and treats discharge offsite prior to entering the Council drainage system is implemented; c. new roof and hard paved areas are to be directed to the harvest tanks to meet the requirements of the proposed water re-use and where there is sufficient fall; and d. the integrated water sensitive design system is to be designed to meet or exceed Council's water treatment guidelines.	Record sighted: AECOM Stormwater Management Compliance Statement issued on 8 November 2019 sighted. The statement was issued to PCA on 15 November 2019 via ACONEX (RCC-GCOR-000002).				
Z39	SSD	B7		Stormwater Management Plans (continued)	Water quality measures are installed that meet the following environmental targets for stormwater runoff leaving the site: a. 90% removal of gross pollutants (> 5mm); b. 85% removal of total suspended solids; c. 65% removal of total phosphorous; and d. 45% removal of total nitrogen.	Record sighted: a-d. AECOM Stormwater Management Compliance Statement issued on 8 November 2019 sighted indicating compliance with the stormwater runoff targets.				



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Z40	SSD	B8		Stormwater Management Plans (continued)	Compliance with the objectives and performance requirements in the Building Code of Australia.	Records sighted: - AECOM Cranbrook School Redevelopment Standard Reference list dated 8 November 2019 stating a standard reference used was the NCC 2016 Amendment 1 Volume 1 BCA Class 2 to Class 9 Buildings. - AECOM Stormwater Management Compliance Statement issued on 8 November 2019. The documents state that the document was in compliance with Building Code of Australia.				
Z41	SSD	B9		Stormwater Management Plans (continued)	The installation of a rainwater tank which is to be connected for non-potable uses such as irrigation. Overflow from the rainwater tank shall be directed to the proposed on-site absorption system.	Record sighted: AECOM Stormwater Management Compliance Statement issued on 8 November 2019. This document indicates that rainwater tank is to be connected for non-potable uses such as irrigation.				
Z42	SSD	B10		Stormwater Management Plans (continued)	The installation of a bio-retention system to achieve the water quality targets stipulated in Chapter E2.2.3 of the Woollahra Development Control Plan 2015.	Record sighted: AECOM Stormwater Management Compliance Statement issued on 8 November 2019. This document indicates that bio-retention system will achieve water quality targets.				
Z43	SSD	B11		Roadworks and Access	Prior to the issue of any construction certificate, the Applicant must submit design plans to the satisfaction of the relevant roads authority which demonstrate that the proposed accesses to the development are designed to accommodate the turning path of all construction vehicles.	CTMP is provided as Appendix C of the CEMP. The CTMP does not provide requirement for turning vehicles, but the presence of Work Zones adjacent to Gate 2 and 3 is outlined. Section 5.6 of the CTMP states construction vehicles will access and egress the site in a forward direction, indicating there is no need for turning path of construction vehicles outside the site. Observation on site indicates that there is adequate space within the site for vehicle turning. CTMP has been approved by TfNSW on 10 December 2019 and by Woollahra Council in an email dated 26 November 2019. Evidence of consultation with RMS has been sighted.				
Z44	SSD	B12		Provision of public footpath	Plans provided as part of the Construction Certificate shall clearly indicate the existing road reserve as well as the public footpath area to be dedicated as road reserve (i.e. that area provided within private land that is required to provide a 2.5m wide pedestrian footpath along New South Head Road). The area provided shall be sufficient to accommodate a shared cycle/pedestrian path clear of any obstructions.	17/09/2020 Record sighted: RCC Memorandum 'Item B12 Provision of Public Footpath' dated 21 November 2019 stating that RCC requested that this item be moved to a later CC from assessment as this is not affected by works in CC1. Item is not triggered.				
Z45	SSD	B13		Construction Impact Assessment and Management Plan	Prior to the issue of any construction certificate, the Construction Impact Assessment and Management Plan, prepared by Botanics Tree Wise People Pty Ltd, amended October 2018, is updated to provide the following: a. comprehensive assessment of the impact on the trees in accordance with industry standards and arboricultural best practice to demonstrate that all options have been considered to retain as many trees as possible on the site. This includes making an assessment using Australian Standard AS 4970-2009: The Protection of Trees on Development sites; and b. tree and site-specific tree protection strategy which details what methods are proposed to minimise impacts to trees to be retained.	a & b. Botanics Tree Wise People (8 November 2011) Arborist report was sighted and states the report was completed in accordance with AS 4970-2009 and includes protection strategies for the specific site/trees.				
Part C Prior to Commencement of Works										
Z46	SSD	C1	Admin	Notification of Commencement	The Department must be notified in writing of the dates of commencement of physical work and operation at least 48 hours before those dates.	Notification letter from Richard Crookes dated 21 November 2019 was sighted for commencement on 3 December 2019.				
Z47	SSD	C2	Admin	Notification of Commencement (continued)	If the construction or operation of the development is to be staged, the Department 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.	30/06/2020 Record sighted: RCC email correspondence confirming that no staging of the works is planned.				

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Z48	SSD	C3	Admin	Certified Drawings	Prior to the commencement of works, the Applicant must submit to the satisfaction of the Principal Certifying Authority structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.	Records sighted: - Arup Structural Certification dated 30 October 2019. - Submission via Aconex to PCA on 15 November 2019 (RCC-GCOR-000002)				
Z49	SSD	C4	Admin	Protection of Public Infrastructure	Before the commencement of works, the Applicant must: a. consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; b. prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and c. submit a copy of the dilapidation report to the Principal Certifying Authority and Council.	a. - RCC confirmed Telstra have attended site in May 2020 and confirmed the process to adjust their services affected by Construction works, including some Optus services also within the area. Scope of services due to be provided from Telstra in June - July 2020.  - Deed of Agreement for Easement Contestable ASP1 Connections issued to Ausgrid in early March 2020. On 12/03/20, Northrop ASP3 advised that Ausgrid require some changes to the substation design in order to re-certify and approve the works for construction. RCC are currently finalising design to re-issue to Ausgrid.  - Notice of Requirements & Section 73 design is currently being finalised. Sydney Water Developer Works deeds for minor and major works are being prepared for submission to Sydney Water by late June 2020.  b&c. SCP (30/10/2019) Pre-Construction Dilapidation & Photographic Survey of RMS Infrastructure Rose Bay Avenue and New South Head Road provided. Email submission for Council was sighted. Compliance report states that the report was submitted to PCA on 13 November 2019.				
Z50	SSD	C5	Contamination	Unexpected Contamination Procedure	Prior to commencement of works, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition C12 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.	Covered under Initial Audit: - Douglas Partners (March 2019) Unexpected Finds Protocol Cranbrook School Victoria Road, Bellevue Hill was prepared.  - 5/2/2020: Unexpected find in the form of asbestos sheeting was encountered in the area preclassified as general solid waste. Dockets for asbestos soil to Suez Elizabeth Drive Waste Management Centre (5 dockets) on 23- 24January 2020 were sighted. Confirmed in email 10/2/2020.				



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Z51	SSD	C6	Consultation	Community Communication Strategy	No later than two weeks before commencement of construction, a Community Communication Strategy must be submitted to the Planning Secretary for information and approved by the Planning Secretary prior to commencement of construction. The Community Communication Strategy must be prepared to provide mechanisms to facilitate communication between the Applicant, the relevant Council and the community (including adjoining affected landowners and business, and other directly impacted by the development), during the design and construction of the development and for a minimum 12 months following the completion of construction. The Community Communication Strategy must: a. identify people to be consulted during the design and construction phases; b. set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; c. provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; d. set out procedures and mechanisms: i. through which the community can discuss or provide feedback to the Applicant; ii. through which the Applicant will respond to enquiries or feedback from the community; and iii. to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation.	All covered under Initial Audit and assessed as compliant: - Community Communication Strategy has been reviewed and approved by DPIE in a letter dated 26 November 2019.				
Z52	SSD	C7	Consultation	Community Communication Strategy (continued)	Work for the purposes of the development must not commence until the Community Communication Strategy has been approved by the Planning Secretary, or within another timeframe agreed with the Planning Secretary.	Covered under Initial Audit and assessed as compliant: - Community Communication Strategy has been reviewed and approved by DPIE in a letter dated 26 November 2019.				
Z53	SSD	C8	Water	Rainwater Harvesting	Prior to the commencement of construction, the Applicant must ensure that a rainwater reuse/harvesting system for the development is developed for the site. A rainwater re-use plan must be prepared and certified by an experienced hydraulic engineer.	Covered under Initial Audit and assessed as compliant: - A drawing by AECOM showing rainwater reuse plan (sheet no. 60549969-SHT-01-CR-C-0351) sighted.				
Z54	SSD	C9	ESD	Ecologically Sustainable Development	Prior to commencement of works, the Applicant must demonstrate that ESD is being achieved by either registering a minimum 4 star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Principal Certifying Authority, unless an alternative Certification process is agreed to by the Planning Secretary.	Covered under Initial Audit and assessed as compliant: - Payment for Green Building Council of Australia (GBCA) was sighted. Confirmation that the site was registered for a Green Star - Design & As Built v1.2 rating was provided by GBCA in email dated 6 December 2019. ARUP Green Star Design was sighted, which shows that the target points is 49 (which exceeds requirement for 4 star rating).				
Z55	SSD	C10	Building	Demolition	Prior to the commencement of construction works, demolition plans required by AS 2601-2001 The demolition of structures (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposal 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 Principal Certifying Authority and Planning Secretary.	Covered under Initial Audit and assessed as compliant: - Demolition Work Plan by Richard Crookes Construction (dated 7 November 2019) was sighted. Statement of compliance to AS2601:2001 was provided by Matt Dalley Demolition in a letter dated 20 November 2019.				

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Z56	SSD	C11	CEMP	Environmental Management Plan Requirements	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: a. detailed baseline data; b. details of: i. the relevant statutory requirements (including any relevant approval, licence or lease conditions); ii. any relevant limits or performance measures and criteria; and iii. the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; c. a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; d. a program to monitor and report on the: i. impacts and environmental performance of the development; ii. effectiveness of the management measures set out pursuant to paragraph (c) above; e. a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; f. a program to investigate and implement ways to improve the environmental performance of the development over time; g. a protocol for managing and reporting any: i. incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); ii. (complaint; iii. failure to comply with statutory requirements; and h. a protocol for periodic review of the plan and any updates in response to incidents or matters of non-compliance. Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans	All covered under Initial Audit and assessed as compliant: - CEMP was reviewed and generally contains the details required by this condition.				

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Z57	SSD	C12	CEMP	Construction Environmental Management Plan	Prior to commencement of construction works, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the satisfaction of the Principal Certifying Authority and provide a copy to the Planning Secretary. The CEMP must include, but not be limited to, the following: a. Details of: i. hours of work; 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; v. measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; vi. groundwater management plan including measures to prevent groundwater contamination; vii. external lighting in compliance with AS 4282-1997 Control of the obtrusive effects of outdoor lighting; viii. community consultation and complaints handling; b. Construction Traffic and Pedestrian Management Sub-Plan (see condition C13); c. Construction Noise and Vibration Management Sub-Plan (see condition C14); d. Construction Waste Management Sub-Plan (see condition C15); e. Construction Soil and Water Management Sub-Plan (see condition C16); f. Flood Emergency Response Sub-Plan (see condition C17); g. an unexpected finds protocol for contamination and associated communications procedure; h. an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; and i. waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site.	All covered under Initial Audit and assessed as compliant: - CEMP was reviewed and contains the details required by this condition. Evidence of submission to DPIE (in email dated 11 December 2019) has been sighted. Construction certificate issued.				
Z58	SSD	C13	CEMP	Construction Environmental Management Plan (continued)	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must address, but not be limited to, the following: a. be prepared by a suitably qualified and experienced person(s); b. be prepared in consultation with Council, TfNSW (RMS) 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; d. detail heavy vehicle routes, access and parking arrangements; e. include a Driver Code of Conduct to: i. minimise the impacts of earthworks and construction on the local and regional road network; ii. minimise conflicts with other road users; iii. minimise road traffic noise; and iv. ensure truck drivers use specified routes; f. include a program to monitor the effectiveness of these measures; and g. if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.	All covered under Initial Audit and assessed as compliant: - CTMP is provided as Appendix C of the CEMP and contains items required by this condition. CTMP has been approved by TfNSW on 10 December 2019 and by Woollahra Council in an email dated 26 November 2019. Evidence of consultation with RMS has been sighted.				

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Z59	SSD	C14	CEMP	Construction Environmental Management Plan (continued)	The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following: a. be prepared by a suitably qualified and experienced noise expert; b. describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); c. describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; d. include strategies that have been developed with the community for managing high noise generating works; e. describe the community consultation undertaken to develop the strategies in condition C6(d) and f. include a complaints management system that would be implemented for the duration of the construction.	Covered under Initial Audit and assessed as compliant: - Construction Noise and Vibration Management Sub-Plan is provided as Appendix D of the CEMP and contains items required by this condition.				
Z60	SSD	C15	CEMP	Construction Environmental Management Plan (continued)	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the following: a. detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; b. 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 in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works.	Covered under Initial Audit and assessed as compliant: - The CWMSP (Appendix E of CEMP) was reviewed and was observed to contain the information required by this condition.				
Z61	SSD	C16	CEMP	Construction Environmental Management Plan (continued)	The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following: a. be prepared by a suitably qualified expert, in consultation with Council; b. describe all erosion and sediment controls to be implemented during construction; c. provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); d. include an Acid Sulfate Soils Management Plan, if required, including measures for the management, handling, treatment and disposal of acid sulfate soils, including monitoring of water quality at acid sulfate soils treatment areas; e. detail all off-Site flows from the Site; and f. 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 1-year ARI, 1 in 5-year ARI and 1 in 100-year ARI).	Covered under Initial Audit and assessed as compliant: a-f - The CSWMP (Appendix F of CEMP) was reviewed and was observed to contain the information required by this condition, with the exception of acid sulfate soil management plan. Douglas Partners (28 February 2018) states that acid sulfate soil management plan is not required,. Based on this, the Auditor agrees that this condition has been met. a - Woollahra Municipal Council letter dated 2 December 2019 stating that the Construction Soil and Water Management Plan satisfies Condition C16 of this SSD.				
Z62	SSD	C17	CEMP	Construction Environmental Management Plan (continued)	The Applicant must prepare a Flood Emergency Response Sub-Plan (FERSP) and the plan 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 Guideline (OEH, 2007); c. include details of: i. the flood emergency responses for both construction and operation 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.	Covered under Initial Audit and assessed as compliant.				

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Z63	SSD	C18	CEMP	Erosion and Sedimentation Control	Soil erosion and sediment control measures must be designed in accordance with the document Managing Urban Stormwater – Soils & Construction Volume 1 (Landcom, 2004). Details are to be submitted to the satisfaction of the Principal Certifying Authority prior to the commencement of construction.	Covered under Initial Audit and assessed as compliant: - AECOM letter dated 8 November 2019 provides civil design statement, including for soil erosion and sediment control. CC has been issued.				
Z64	SSD	C19	CEMP	Construction Parking	Prior to commencement of works, the Applicant must provide sufficient parking facilities on-site, including for heavy vehicles, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.	30/06/2020 Observation: - Based on observations made during the Audit inspection, there was considered to be sufficient parking on-site for construction vehicles.				
Z65	SSD	C20	CEMP	Construction and Demolition Waste Management	The Applicant must notify the TfNSW (RMS) Traffic Management Centre of the truck route(s) to be followed by trucks transporting waste material from the site, prior to the commencement of the removal of any waste material from the site.	Covered under Initial Audit and assessed as compliant: - The truck route is included in the Construction Traffic Management Plan, which has been approved by TfNSW (letter dated 10 December 2019)				
Z66	SSD	C21	CEMP	Construction Worker Transportation Strategy	Prior to the commencement of construction, the Applicant must submit a Construction Worker Transportation Strategy to the satisfaction of the Principal Certifying Authority. 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.	Covered under Initial Audit and assessed as compliant: - Construction Worker Transportation Strategy has been submitted to PCA. CC has been issued.				
Z67	SSD	C22	CEMP	Operational Waste Storage and Processing	Prior to commencement of works, the Applicant must obtain agreement from Council for the design of the operational waste storage area where waste removal is undertaken by Council.	Covered under Initial Audit: - A letter from Cranbrook School states that the school does not use Woollahra Municipal Council for any waste removal services so this item does not apply.				
Z68	SSD	C23	CEMP	Archaeological testing and salvage investigations	The archaeological and salvage investigations detailed in the Aboriginal Cultural Heritage report prepared by Unearthed Archaeology shall be undertaken prior to the issue of Construction Certificates within the vicinity of the proposed investigations.	26/06/2020 Record sighted: - A letter by Unearthed Archaeology & Heritage dated 20 November 2019 states that archaeological test excavations in accordance with the Aboriginal Cultural Heritage Report, which states that area in the vicinity of the War Memorial and Mansfield Buildings and the proposed location of the Centenary Building do not require further archaeological investigation. The archaeological test investigations across Hordern Oval and Fitness Centre and Carpark are ongoing and it is understood that a heritage consultant will be present during construction.  30/06/2020 Record sighted: - RCC email correspondence stating that there will still be some archaeological investigation required as excavation is incomplete. - Unearthed Archaeology & Heritage (9 April 2020) Re: Aboriginal archaeology investigation - Cranbrook School letter provides an update of the areas that have been investigated and those that have not.	To be assessed as part of the subsequent Audit: - RCC to provide Heritage assessment/validation report which provides statement of compliance following completion of excavation.			

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Z69	SSD	C24	Building	Bicycle Parking and End-of-Trip Facilities	Prior to the commencement of construction, compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the satisfaction of the Certifying Authority: a. the provision of a minimum 121 staff/visitor/student bicycle parking spaces; b. the layout, design and security of bicycle facilities must comply with the minimum requirements of AS 2890.3:2015 Parking facilities - Bicycle parking, and be located in easy to access, well-lit areas that incorporate passive surveillance; c. the provision of end-of-trip facilities for staff in accordance with the ESD Design & As Built rating tool; d. appropriate pedestrian and cyclist advisory signs are to be provided; and e. all works/regulatory signposting associated with the proposed developments shall be at no cost to the relevant roads authority.	Records sighted: a. Senior Campus Map Bicycle parking locations with provision for 121 bicycles. Included also on Drawing AF-DA-1002. b. Design drawing 'T-Sheet (Architectural Finishes and Components Shcedule - Cranbrook School) stating Bicycle Rack designs are in accordance with AS2890.3. c & d. Architectus Memorandum - CC_24 'Construction Certificate - C24 Bicycle Parking and End-of-trip Facilities' stating end-of-trip facilites are compliant with ESD Design & As Built rating tool, and appropriate signage. - Submission via Aconex to PCA on 15 November 2019 (RCC-GCOR-000002)				
Z70	SSD	C25	Compliance	Compliance Reporting	No later than two weeks before the date notified for the commencement of construction, a Compliance Monitoring and Reporting Program prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2018) must be submitted to the Department and the Principal Certifying Authority.	21/9/2020: Records sighted: - EPM (19 November 2019) Cranbrook School Redevelopment Project Pre-Construction Compliance Report (which includes Compliance Reporting program) - Submission of the above report to DPIE on 19 November 2019.				
Z71	SSD	C26	Compliance	Compliance Reporting(continued)	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2018), unless otherwise agreed by the Planning Secretary.	11/09/2020 Record sighted: -EPM Projects Pty Ltd (19 Nov 19), Pre-Construction Compliance Report - Cranbrook School Redevelopment Project Rev D (IMS Document No. B04-TEM-014, Version 1.04) -EPM Projects Pty Ltd (18 June 20), Construction Compliance Report - Cranbrook School Redevelopment Project Rev D (IMS Document No. B04-TEM-014, Version 1.04)				
Z72	SSD	C27	Compliance	Compliance Reporting (continued)	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Department and notify the Department and the Principal Certifying Authority in writing at least seven days before this is done.	11/09/2020 Record sighted: Compliance reports available through the Cranbrook School website <https://www.cranbrook.nsw.edu.au/about/future-cranbrook.aspx>				
Z73	SSD	C28	Compliance	Compliance Reporting (continued)	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.	Not applicable for construction phase				
Z74	SSD	C29	Amenity	Car Parking and Service Vehicle Layout	Prior to the commencement of construction, compliance with the following requirements must be submitted to the satisfaction of the Certifying Authority: a. all construction vehicles must enter and leave the Site in a forward direction; b. a minimum of 124 on-site car parking spaces for use during operation of the development and designed in accordance with the latest version of AS2890.1; c. the swept path of the longest construction vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the Site, must be in accordance with AUSTROADS; and the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed.	30/06/2020 Records sighted: - Section 5.9 of the CTMP states that construction vehicles will access and egress the site in a forward direction. - Parking & Traffic Consultants (30 October 2019) Design Statement noting compliance to conditions (a to c) -Submission via Aconex to PCA on 15 November 2019 (RCC-GCOR-000002)				



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Z75	SSD	C30	Amenity	Landscaping	Prior to the commencement of construction, the Applicant must submit amended plans to the satisfaction of the Principal Certifying Authority detailing: a. the provision of at least an additional seven locally indigenous mature shade providing canopy trees on the site; b. the provision of street trees along the New South Head Road. Species and spacing must be in consultation with Council.	11/09/2020 Record sighted: RCC consulted with Woollahra Municipal Council between 26/11/19 – 16/12/19 and arranged for amended plans to Council's satisfaction. The amended plans were subsequently issued to the PCA prior to CC1.				
Z76	SSD	C31	Amenity	Road and Public Domain Works	A separate application under Section 138 of the Roads Act 1993 must be made to, and be approved by Council as the road authority, for the following infrastructure works prior to the commencement of construction of the road and public domain works: a. The removal of existing kerb and gutter and the construction of a new 5.5m wide vehicular crossing for vehicular access into the proposed basement parking in accordance with Council's standard driveway drawing RF2_D. The new crossing must be constructed at right angle to the street kerb in plain concrete. A design longitudinal surface profile for the proposed driveway must be submitted for assessment; b. The removal of existing kerb and gutter and the construction of a new 3m wide vehicular crossing for vehicular access into the proposed maintenance building in accordance with Council's standard driveway drawing RF2_D. The new crossing must be constructed at right angle to the street kerb in plain concrete. A design longitudinal surface profile for the proposed driveway must be submitted for assessment; c. The removal of the existing kerb ramp and the construction of a new kerb ramp in accordance with Council's specification; d. The reconstruction of the existing kerb and gutter, between the new vehicular crossing for access into the maintenance building and the new kerb ramp removal of existing kerb and gutter in plain concrete in accordance with Council's standard driveway drawing RF2_D; e. The reconstruction of the existing footpath across the frontage of the proposed works in New South Head Road in accordance with Council's standard driveway drawing RF2_D. The footpath must be constructed to the following specification: - The width of the footpath must be 2.5m - The footpath must be constructed in concrete - A maximum crossfall of 3% must be provided f. The reconstruction of the kerb and footpath along Rose Bay Avenue in accordance with the approved plans listed in Condition A2(d); g. Detailed long section and cross section at every 5m interval must be prepared by a suitably qualified and experienced civil engineer; h. The construction of all traffic devices, associated landscaping and infrastructure (footpath, kerb and gutter and road pavement) works on Council's	This item is required prior to the commencement of construction of the road and public domain roads, which has not occurred at the time of the Audit. Confirmed by e-mail correspondence from RCC dated 17/09/20.				
Z77	SSD	C32	Amenity	Road and Public Domain Works (continued)	A bond of \$118,500 will be used as security to ensure satisfactory completion of the infrastructure works. The security or bank guarantee must be the original unconditional bank guarantee with no expiry date; and	Record sighted: - Proof of payment of bond to Council on 21 November 2019.				
Z78	SSD	C33	Amenity	Road and Public Domain Works (continued)	The Bond will not be released until Council has inspected the site and is satisfied that the works have been completed in accordance with Council approved drawings and to Council requirements.	Not applicable for current construction audit				

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Z79	SSD	C34	Services	Provision for Energy Supplies	Any required substation must be located within the boundaries of the site. Where an electricity substation is required within the site but no provision has been made to place it within the building and such substation has not been detailed in approved plans, Section 4.55 application is to be submitted to assess the proposed location of the required substation.	Record sighted: - Architectus drawing AF-DA-1001, rev. 5 included substation.				
Part D During Construction										
Z80	SSD	D1	Amenity	Site Notice	A site notice(s): a. must be prominently displayed at the boundaries of the site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Principal Certifying Authority and Structural Engineer and is to satisfy all but not be limited to, the following requirements: i. minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size; ii. the notice is to be durable and weatherproof and is to be displayed throughout the works period; iii. the approved hours of work, the name of the 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 iv. the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the site is not permitted.	30/06/2020 Observation: - Site notices observed on the perimeter hoarding including safety identifiers, site contact details, PCA contact details, the approved hours of work, the name of the site manager and 24 hour contact number, no unauthorised access.				
Z81	SSD	D2	Plant & Equipment	Operation of Plant and Equipment	All plant and equipment used on site, or to monitor the performance of the development must be: a. maintained in a proper and efficient condition; and b. operated in a proper and efficient manner.	01/07/2020 Record sighted: - RCC provided a maintenance record for site plant and equipment which included inspection frequencies, last service date, current hour reading, hours last service P.M. informed, hours left until the next P.M. is due, and current machine location.				
Z82	SSD	D3	Building	Demolition	Demolition work must comply with Australian Standard AS 2601-2001. The demolition of structures (Standards Australia, 2001).	Record sighted: Matt Dalley Demolition A Demolition Work Plan (7 November 2019) and Statement of Compliance in accordance with AS2601-2001 (20 November 2019) from Matt Dalley Demolition.				
Z83	SSD	D4	Admin	Landscaping	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.	19/06/2020 Record sighted: - Sign in/out register provided by RCC showing general compliance with the approved construction hours.  30/06/2020 Record sighted: - Email correspondence from RCC that any sign in/out outside of permitted hours were either: a) construction workers arriving to site amenities early to have breakfast or prepare/plan for their shift start at 7am, or b) administrative/office based staff who work later than 6pm.				
Z84	SSD	D5	Admin	Construction Hours (continued)	Notwithstanding D4 above, when demolition, excavation and constructions works are to be undertaken on school days, all vehicular movements associated with this work shall only be undertaken between the hours of 7am and 8am, 9:00am and 2:30pm and 4:00pm and 5:00pm in order to minimise disruption to the traffic network during school pick-up and drop-off periods.	19/06/2020 Record sighted: -Daily delivery booking summaries for 17/06/20 and 18/06/20 showing compliance with Condition D5. -Delivery receival locations tracking app screenshot for 15/06/20 showing compliance with the Condition.				



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Z85	SSD	D6	Admin	Construction Hours (continued)	Construction activities may be undertaken outside of the hours in condition D4 if required: a. by the Police or a public authority for the delivery of vehicles, plant or materials; or b. in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or c. where 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.	19/06/2020 Record sighted: Two notification letters provided for Works out of standard hours, one dated 24 March 2020 and the other dated 29 May 2020. - No other out of hours works have been required. 17/09/2020 Record sighted: -RCC and DPIE correspondence e-mail chain regarding out of hour works complaint. Final email provided by DPIE dated 8//9/2020 indicates that the DPIE investigation is complete and that there are no further follow up items regarding the out of hours delivery of overmass/sized plant. The Auditor considers that the work outside of the approved hours is in compliance with reason (d).				
Z86	SSD	D7	Admin	Construction Hours (continued)	Notification of such construction activities as referenced in Condition D6, must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	19/06/2020 Record sighted: Two notification letters provided for outside of standard hours works, one dated 24 March 2020 and the other dated 29 May 2020.				
Z87	SSD	D8	Admin	Construction Hours (continued)	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.	30/06/2020 Observation: - Audit inspection carried out within allowable times for these activities and these activities were not observed at the time of Audit.				
Z88	SSD	D9	CEMP	Implementation of Management Plans	The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	Covered under audits for CEMP implementation and assessed as compliant.				
Z89	SSD	D10	Traffic	Construction Traffic	All demolition and construction vehicles (excluding worker vehicles) are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site before stopping.	30/06/2020 Observation: - No construction vehicles were observed on public streets during the Audit inspection. All vehicles appeared to enter the site prior to stopping.				
Z90	SSD	D11	Traffic	Construction Traffic (continued)	No construction or on-going access for vehicles is to be gained directly from the classified road network (i.e. along the New South Head Road boundary of the development site) without approval from the relevant road authority.	30/06/2020 Observation: - No construction vehicles were observed accessing the site directly from New South Head Road.				
Z91	SSD	D12	Traffic	Construction Traffic (continued)	All vehicles are to enter and exit the site in a forward direction.	30/06/2020 Observation: - All vehicles were observed entering and exiting the site in a forward direction.				
Z92	SSD	D13	Traffic	Hoarding Requirements	The following hoarding requirements must be complied with: a. no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; 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.	30/06/2020 Observation: - Site hoarding around the perimeter of the construction site was observed free of third-party advertising and graffiti.				
Z93	SSD	D14	Traffic	No Obstruction of Public Way	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances without relevant authority approval. Non-compliance with this requirement will result in the issue of a notice by the relevant Authority to stop all works on site.	30/06/2020 Observation: - The public roadway was observed to be clear of materials, vehicles, refuse, skips and the like.				

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Z94	SSD	D15	Noise	Construction Noise Limits	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.	Covered under audits for CEMP implementation which have been assessed as compliant based on site records and observations.				
Z95	SSD	D16	Noise	Construction Noise Limits (continued)	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 D4.	Covered under SSD Condition D4, assessed as compliant.				
Z96	SSD	D17	Noise	Construction Noise Limits (continued)	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use audible movement alarms (quackers) to minimise noise impacts on surrounding noise sensitive receivers.	30/06/2020 Observation: - During the Audit inspection there was no obvious audible movement alarms noted.				
Z97	SSD	D18	Noise	Vibration Criteria	Vibration caused by construction at any residence or structure outside the site must be limited to: a. for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and b. for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time).	The Construction Noise and Vibration Management Plan (Appendix D of CEMP) provides criteria for vibration as per condition D18. Covered by audit of CEMP and assessed as compliant. 30/06/2020 Record sighted: - Observed bored piling rigs. - Daily (28/06/2020 - 29/06/2020) vibration monitoring data provided via email to site managers. If limit is exceeded then an alarm is issued to site managers via SMS. Limit is 5mm/s. - Letter drop communications are regularly provided to neighbours. One Vibratory Works update flyer was provided date 9 June 2020.				
Z98	SSD	D19	Noise	Vibration Criteria (continued)	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 D18	19/06/2020 Record sighted: - RCC provided a mark-up map of the site highlighting where vibratory compacting areas were and their distance from nearby residential properties was provided showing that the distance was at least 30m from the residential properties.				
Z99	SSD	D20	Noise	Vibration Criteria (continued)	The limits in conditions D18 and D19 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition C12 of this consent.	The Construction Noise and Vibration Management Plan (Appendix D of CEMP) provides criteria for vibration as per condition D18 and D19. This is covered under audit of the CEMP and assessed compliant.				
Z100	SSD	D21	Air	Air Quality	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	30/06/2020 Observation: - Dust mitigation measures such as evidence of a water cart, geofabric placed on non-work areas, and dust suppression misters were observed. - No evidence of excess dust generation was observed				
Z101	SSD	D22	Air	Air Quality (continued)	During construction, the Applicant must ensure that: a. exposed surfaces and stockpiles are suppressed by regular watering; 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.	30/06/2020 Observation: - Geofabric observed to be in place during the site inspection in non-working surfaces. - Truck loads were observed covered. - Public roadways were observed clear of dirt and evidence of watering down was noted.				

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Z102	SSD	D23	Sediment	Erosion and Sediment Control	All erosion and sediment control measures must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment.	Covered under audit for CEMP requirements, assessed as compliant. 30/06/2020 Observation: - Sediment fencing was observed around the site. - No evidence of sediment leaving the site was observed.				
Z103	SSD	D24	Soil	Imported Soil	The Applicant must: a. ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site; b. keep accurate records of the volume and type of fill to be used; and c. make these records available to the Principal Certifying Authority upon request.	26/06/2020 Record sighted: (a) to (c) - Email from RCC stating that no imported fill has been brought onto site since the last audit.				
Z104	SSD	D25	Water	Disposal of Seepage and Stormwater	Adequate provisions must be made to collect and discharge stormwater drainage during construction of the building to the satisfaction of the Principal Certifying Authority. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	26/06/2020 Record sighted: - Email from RCC stating that there has been no discharge since the last audit. - No complaints or incidents recorded on stormwater discharge.				
Z105	SSD	D26	Heritage	Unexpected Finds Protocol – Aboriginal Heritage	In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by EESG and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and EESG to develop and implement management strategies for all objects/sites. Works shall only recommence with the written approval of EESG.	26/06/2020 Record sighted: - Email from RCC stating that there have been no Aboriginal objects uncovered since the last audit. - Site induction includes processes of identification of Aboriginal heritage artefacts.				
Z106	SSD	D27	Heritage	Unexpected Finds Protocol – Historic Heritage	If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and the Heritage Division contacted. Depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area. Works may only recommence with the written approval of Heritage Division of the Department of Premier and Cabinet.	26/06/2020 Record sighted: - Email from RCC stating that there have been no Aboriginal objects uncovered since the last audit. Condition considered non-triggered.				
Z107	SSD	D28	Waste	Waste Storage and Processing	All waste generated by 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.	30/06/2020 Observation: - Waste was observed segregated in designated waste storage areas. - A stockpile of waste observed. No cover was placed on the stockpile, however, it was noted that covering would be impractical as the stockpile was continuously taken from and placed in trucks for offsite disposal.				

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Z108	SSD	D29	Waste	Waste Storage and Processing (continued)	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	<p>19/06/2020 Record sighted:</p> <ul style="list-style-type: none"><li>- DumpIT Bins/ DumpIT Recycling Centre waste stream summary for the months of April and May 2020. There is noted to have been 5.27 tonnes of VENM/Fill recycled at an offsite facility over those two months.</li><li>- ECS Waste classification provides classification of underlying natural sands as VENM. Previous Audit considers this material to likely comprise as ENM instead of VENM.</li></ul> <p>30/06/2020 Record sighted:</p> <ul style="list-style-type: none"><li>- ECS (23 June 2020) 'Waste Classification Confirmation Cranbrook School Bellevue Hill' which states that 4 previous inspections occurred (10 and 27 Jan, 29 Feb, and 14 May 2020. Inspection of the underlying sand and sampling for total recoverable hydrocarbons, polycyclic aromatic hydrocarbons, and heavy metals indicated that the material was consistent with the VENM classification.</li></ul> <p>2/6/2020: Record sighted:</p> <ul style="list-style-type: none"><li>- Spoil removal matrix listing the dates of disposal, waste disposal contractor, type of waste, vehicle rego, disposal location, disposal wieght, disposal volume, disposal status (i.e. recycled, reuse, landfill), and document number.</li></ul> <p>30/6/2020: Observation:</p> <ul style="list-style-type: none"><li>- The excavated material was observed to be consistent with VENM, however some anthropogenic material (concrete etc.) was observed on the surface (from demolition of slab). RCC confirmed that the anthropogenic material was screened out prior to offsite disposal. This practice was also observed onsite.</li></ul>				
Z109	SSD	D30	Waste	Waste Storage and Processing (continued)	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	<p>30/06/2020 Observation:</p> <ul style="list-style-type: none"><li>- Concrete stockpile observed for offsite disposal.</li></ul> <p>26/06/2020 Record sighted:</p> <ul style="list-style-type: none"><li>- DumpIT Bins waste summary for April and May 2020 with waste stream breakdown, quantity, and fate.</li><li>- Concrete rinse water is contained, allowed to set, and then disposed offsite as concrete waste.</li></ul>				
Z110	SSD	D31	IEA	Independent Environmental Audit	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.	Covered under Initial Audit. DPIE has provided a letter of approval for the IEA Auditor.				
Z111	SSD	D32	IEA	Independent Environmental Audit (continued)	Prior to commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Department and the Principal Certifying Authority.	Covered under Initial Audit. IEA Program prepared and submitted to DPIE.				

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Z112	SSD	D33	IEA	Independent Environmental Audit (continued)	<p>Table 1 of the Independent Audit Post Approval Requirements (Department 2018) is amended so that the frequency of audits required in the construction phase is:</p> <p>a. An initial construction Independent Audit must be undertaken within eight weeks of the notified commencement date of construction; and</p> <p>b. A subsequent Independent Audit of construction must be undertaken no later than six months from the date of the initial construction Independent Audit.</p> <p>In all other respects Table 1 remains the same. The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least 4 weeks' notice to the applicant of the date upon which the audit must be commenced.</p>	<p>Covered under Initial Audit. Audit Schedule was amended as per Condition D33 in IEA Audit Program.</p> <p>a. Initial Audit was conducted on 5 February 2020, which was within 8 weeks of issue of construction certificate (19 December 2019).</p> <p>b. Second Audit was conducted within 6 months of Initial Audit.</p>				
Z113	SSD	D34	IEA	Independent Environmental Audit (continued)	<p>Independent Audits of the development must be carried out in accordance with:</p> <p>a. the Independent Audit Program submitted to the Department and the Principal Certifying Authority under condition D32 of this consent; and</p> <p>b. the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).</p>	IEA conducted in accordance with Independent Audit Program and the Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).				
Z114	SSD	D35	IEA	Independent Environmental Audit (continued)	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must:</p> <p>a. review and respond to each Independent Audit Report prepared under condition D34 of this consent;</p> <p>b. submit the response to the Department and the Principal Certifying Authority; and</p> <p>c. make each Independent Audit Report and response to it publicly available within 60 days after submission to the Department and notify the Department and the Principal Certifying Authority in writing at least seven days before this is done.</p>	<p>9/3/2020: EPM states IEA Report and RCC responses were uploaded to DPIE Major Portal site.</p> <p>30/06/2020 Record sighted: - Link to IEA and Response to IEA observed on the project website &lt;<a href="https://www.cranbrook.nsw.edu.au/about/future-cranbrook.aspx">https://www.cranbrook.nsw.edu.au/about/future-cranbrook.aspx</a>&gt;</p>				
Z115	SSD	D36	IEA	Independent Environmental Audit (continued)	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.	Not applicable for current phase of works				
Appendix 1 – Written Incident Notification and Reporting Requirements										
Z116	SSD		Admin		<p>1 A written incident notification addressing the requirements set out below must be emailed to the Department at the following address: <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition A25 or, having given such notification, subsequently forms the view that an incident has not occurred.</p>	<p>Record sighted 26/06/2020:</p> <p>- Email from EPM (Client Project Manager) (17 April 2020) to RCC with contact details from DPIE regarding an Incident Report submitted. Email from DPIE appended from Erica Vandenhonert from Planning NSW.</p> <p>- Email from <a href="mailto:noreply@majorprojects.planning.nsw.gov.au">noreply@majorprojects.planning.nsw.gov.au</a> (24 March 2020) confirming receipt of an incident notice identifying an excavation incident and linking to conditions Schedule A25 and 26 of the specified SSD number.</p> <p>- Notification of Potential Incident document prepared by RCC dated 24 March 2020 outlining the excavation incident that may have compromised the archaeological testing and salvage investigations.</p> <p>- Incident Report prepared by RCC dated 15 April 2020 outlined the incident and corrective actions.</p>				

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Z117	SSD		Admin		2 Written notification of an incident must: a. identify the development and application number; b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); c. identify how the incident was detected; d. identify when the applicant became aware of the incident; e. identify any actual or potential non-compliance with conditions of consent; f. describe what immediate steps were taken in relation to the incident; g. identify further action(s) that will be taken in relation to the incident; and h. identify a project contact for further communication regarding the incident.	See Item Z116				
Z118	SSD		Admin		3 Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	See Item Z116				
Z119	SSD		Admin		4 The Incident Report must include: a. a summary of the incident; b. outcomes of an incident investigation, including identification of the cause of the incident; c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and d. details of any communication with other stakeholders regarding the incident.	See Item Z116				
REVIEW OF COMPLIANCE WITH MANAGEMENT PLANS										
EIS Mitigation Measures										
Visual Impact										
Z120	EIS	9	Amenity	Impact on key views of the site from key public places	- Buildings designed to sit low in the topography and into the hillside slope. - Provision of landscape screening as per Landscape Drawings at Appendix E.	Approval of building design as per SSD consent				
Z121	EIS	9	Amenity	Impact on key views from nearby residential receivers	- Buildings designed to sit low in the topography and into the hillside slope. - Building to be constructed in non-visually dominant colours to minimise perceived bulk, as per Architectural Drawings at Appendix C.	Approval of building design as per SSD consent				
Traffic and Parking										
Z122	EIS	9	Traffic	Impacts on road network from construction phase	- Implement Concept Construction Traffic Management Plan Construction as per Appendix M. - Implement Preliminary Construction Management Plan, as per Appendix BB	This requirement has been superseded by Construction Traffic Management Plan in the CEMP which is compliant.				



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Z127	EIS	9	Traffic	Reduction of pedestrian safety along Rose Bay Avenue footpath during construction	- Given the construction activity in this area, it is proposed to close the footway along the site frontage from the Rose Bay Avenue Gate to the intersection of Rose Bay Avenue and New South Head Road. Pedestrians will be diverted along the eastern footway on Rose Bay Avenue during construction work times.	30/6/2020: Observation: While a plastic barrier exists near the site entrance, this does not prevent pedestrian from passing the site entrance. There is no vehicle access in New South Head Road.  8/7/2020 Record sighted: - Photograph of the site access gate with pedestrian barriers.				
Noise and Vibration										
Z128	EIS	9	Noise	Impact from construction noise and vibration	- Adopt a Construction Noise Management Plan addressing the requirements contained in the Acoustic Report prepared by Acoustic Logic at Appendix V. - Restrict construction activities to only during designated times. Implement Preliminary Construction Management Plan, as per Appendix BB. - Construction equipment may be fitted with noise mitigation equipment wherever possible or reasonable. - Noisy work will be identified and communicated to relevant stakeholders and neighbours, giving them sufficient notice. - Opportunity for noisy works to be limited to approved windows of time if agreed between all parties. - Noisy equipment to be located further away from residential neighbours wherever possible.	Covered under SSD Conditions C13, D14, D16, D17 which were all assessed as compliant.				
Z129	EIS	9	Noise	Vibration during excavation, piling and structural works	- Use bored piles rather than driven piles. - Applicable works will be identified and communicated to relevant stakeholders and neighbours giving them sufficient notice. - Vibration monitors may be provided in close proximity to heritage buildings as an early warning alarm during adjacent piling & structural works.	30/06/2020 Record sighted: - Observed bored piling rigs. - Daily (28/06/2020 - 29/06/2020) vibration monitoring data provided via email to site managers. If limit is exceeded then an alarm is issued to site managers via SMS. Limit is 5mm/s. - Letter drop communications are regularly provided to neighbours. One Vibratory Works update flyer was provided date 9 June 2020.				
Z130	EIS	9	Noise	Increase in mechanical plant noise levels at sensitive receivers	- Acoustic treatment of new mechanical plant shall be undertaken control noise emissions at or below the intrusiveness criteria Background + 5dB(A) Leq(15minutes) of Day – 49, Evening – 44 and Night – 39 as set out in section 6.3.1 (Table 9) of the NIA. Plant can be satisfactorily attenuate to levels complying with these noise emission criteria through appropriate location and (if necessary) standard acoustic treatments such as noise screens, enclosures, in-duct treatments (silencers/lined ducting) or similar. - Acoustic rectification treatment shall be designed for existing plant if an acoustic review determines this necessary.	30/06/2020 Record sighted: - Weekly monitoring using hand held device. Noise data provided for 16 June 2020 = New South Head Road 73.2 dB 10:05am, Rose Bay Ave 63.1 @10:30am, Rose Bay Ave 69.4 @10:16am. As previously discussed during the first Audit, the exceedances were considered to be due to traffic noise, rather than construction noise. 30/6/2020 Observation: - No excessive noise was observed as a result of construction activities.				



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Z131	EIS	9	Noise	Increase in operational noise levels at sensitive receivers	- Daytime Use (Standard School Hours) – Minimum 6mm thick glazing with full perimeter acoustic seals (rubber bulb seals) are recommended to all glazed elements to the façades of the building. The glazed assembly (glass and frame) must achieve an STC of at least 29. - Afterhours Use – Indoor Areas to be used for Functions/Events. Outdoor areas of the proposed development should not include amplified music or speech after 8pm. - Management to ensure patrons leaving development after function/event, do so in a prompt and orderly manner.	Not applicable for the current phase of works				
Z132	EIS	9	Noise	Regular School activities impacted by construction noise	- Implement Preliminary Construction Management Plan, as per Appendix BB	This requirement has been superseded by Construction Traffic Management Plan in the CEMP which is assessed as compliant.				
Heritage										
Z133	EIS	9	Heritage	Impacts to heritage items during demolition and development	- It is recommended that a Photographic Archival Recording (PAR) is undertaken where works are proposed, prior to any works being undertaken at the site. - An assessment and inventory of all items of moveable heritage located in or connected with the War Memorial Hal, these elements should be incorporated in the New Centenary Building development. - An Interpretation Plan should be developed to convey the development and significance of the site to students and visitors to the site. - During the excavation process, should any object with archaeological potential be uncovered, all work is to cease and a suitably qualified archaeologist engaged. - A suitably qualified heritage architect/consultant should be engaged to oversee all works to buildings of identified high significance, including the Perkins Building. - A suitable protection methodology prior to works commencing on site to protect the significant Kauri Pine and rock face located in Camelia Court.	Covered under Initial Audit and assessed as compliant.: The following documents were available to meet this condition: - Urbin (10 April 2018) Demolition Report Cranbrook School: War Memorial Hall and Mansfield Building. - Urbis (7 May 2018) Heritage Impact Statement Cranbrook School 5 Victoria Road, Bellevue Hill 2023. - Urbis (23 January 2020) Archival Recording, Cranbrook School, 5 Victoria Road, Bellevue Hill. - Cranbrook School Moveable Heritage Identification.				
Z134	EIS	9	Heritage	Discovery of items of archaeological significance during construction	- During the excavation process, should any object with archaeological potential be uncovered, all work is to cease and a suitably qualified archaeologist engaged.	Covered under SSD condition D26 & D27, assessed as compliant.				
Z135	EIS	9	Heritage	Disturbance of previously unidentified items of aboriginal heritage	- Implement an 'unexpected finds protocol' to ensure that if, during excavation, any items of potential archaeological significance are uncovered they are identified, managed, protected and preserved.	26/06/2020 Record sighted: - RCC provided email statement that no unexpected finds were encountered to date.				
Sediment, Erosion and Dust Controls										



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Z140	EIS	9	Contamination	Hazardous materials being encountered during demolition, excavation or construction phases	- Hazardous materials survey conducted prior to works commencing on site. - Appropriately licenced contractors engaged to remove any hazardous materials found. - Appropriate signage and exclusion zones maintained during applicable works.	30/06/2020 Record sighted: - ECS (23 June 2020) 'Retaining Wall Material, Cranbrook School Bellevue Hill'. The report provides the findings for the investigation of the sand from around a concrete footing/wall at the southern end of the development. The report did not indicate any hazardous materials.	Recommendation: It is understood only partial slab removal has occurred. RCC to provide asbestos clearance on removal of the slab. To be checked in subsequent Audit.			
Trees										
Z141	EIS	9	Amenity	Damage to trees identified as being retained	Adherence to all mitigation measures identified in Arboricultural Impact Assessment, including: - Appointment of Site Arborist: A site arborist shall be appointed prior to the commencement of work on site. The Site Arborist shall clearly mark out all trees to be removed and ensure that all trees documented for retention are preserved with the implementation of tree protection zones, fencing and signage. The Site Arborist shall have a minimum qualification equivalent to a NSW TAFE Certificate Level 5 or above in Arboriculture. - Inspection Points: Give 5 working days notice to allow inspections to be undertaken at the following stages: - Installation of Tree Protection Zones including Tree Protection - Fencing, Silt Fencing and Signage by the Site Arborist; - Any modification of the Tree Protection Zone by the Site Arborist; - Works within the Tree Protection Zone by the Site Arborist; and - Completion of Construction Works by the Site Arborist and Site Supervisor. - Education: Contractors and site workers shall receive a copy of these specifications prior to the commencement of work. Contractors and site workers undertaking any works within a TPZ shall sign the site log to confirm that they have read and understand these specifications prior to their undertaking. - Tree Protection Zones: Where applicable, all trees to be retained through the construction process shall be protected from mechanical damage and the indirect impacts of the construction process with the installation of Tree Protection Zones. - Tree Protection Fencing: Tree Protection Fencing shall be installed at the perimeter of the TPZ. As a minimum the Tree Protection Fencing shall be 1.8 meters high temporary chain supported by steel stakes. This shall be fastened and supported to prevent sideways movement. The trees woody roots shall not be damaged during the installation of this Tree Protection Fencing. This Tree Protection Fencing shall be erected prior to the commencement of works on site and shall be maintained for the duration of the construction process. - Signage: Tree Protection Signage shall be attached to the TPZ and displayed in a prominent location. These signs shall be repeated in - 10m intervals or closer where the fence changes direction. These shall be a minimum of a 72 font size and each sign at least 600 x500mm	30/06/2020 Observation: - TPZ signage was placed in visible locations along TPZ fencing which appeared to be constructed sufficiently to address the requirements including silt fencing.  26/06/2020 Record sighted: - RCC site induction PowerPoint slide includes discussion of work around TPZ.				

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Z144	EIS	9	Biodiversity	Adverse ecological impacts as a result of the development	30/06/2020 - Stabilisation of unvegetated surface along Rose Bay Ave was observed with mulch and vegetation.  30/06/2020 Record sighted: - RCC email stating that there has not been an incidence of weed growth requiring a weed control plan. No weed reduction measures have been required to date.	30/6/2020 Observation: - The unvegetated surface was observed to be mulched. - No sediment was observed to enter the stormwater drain.  30/06/2020 Record sighted: - RCC email stating that there has not been an incidence of weed growth requiring a weed control plan. No weed reduction measures have been required to date.				
Wind impacts										
Z145	EIS	9	Air	Some of the seating areas would experience elevated wind speeds for extended periods under west and north-east winds.	- It is recommended that vertical screens are placed perpendicular to the balustrade on levels 3 to reduce the air flow running parallel to the balustrade under northeast or west winds. - It is recommended that the internal flow paths be controlled through building management by closing the south doors of the informal learning/house area and the east doors of the war memorial chapel when high wind speeds are predicted. - It is recommended that a draft assessment be conducted on the natural ventilation flow path to ensure air speeds are acceptable. - Should the wind speeds in the outdoor areas require quantification, computation fluid dynamics can be used determine the percentage of time this area is not suitable for sitting.	Not applicable for current phase of works				
Social Impacts										
Z146	EIS		Amenity	Site personnel behaviour both inside and external of the site (eg language, rubbish left on treets,interaction with neighbours)	- Site inductions will include site requirements. That is no inappropriate language, no throwing rubbish on streets, parking of vehicles legally and wearing appropriate clothing etc. - Weekly tool box talks will reinforce requirements. - Regular check of surrounding streets.	26/06/2020 Record sighted: - Site Induction PowerPoint was observed with site requirements listed. - Toolbox talk records for 3, 17, and 24 June 2020 with attendance records - Perimeter inspection checklists provided for 26-29 March 2020.  30/06/2020 Record sighted: - Site induction records maintained on Blueglue. June 2020 records sighted. - Visitor induction completed as part of site visit.  30/6/2020: Observation: Visitor induction conducted to Zoic included appropriate items.				
Response to Submission - Agency Conditions of Consent										

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Z147	RTS	Sydney Water	Admin	-	The approved plans must be submitted to Sydney Water Tap in™ online service to determine whether the development will affect any Sydney Water Sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.	Covered under Initial Audit and assessed as compliant: 12/2/2020: A letter by Warne Smith & Partners (dated 6 December 2019) indicates proposed building is approved to construct over/adjacent to a Sydney Water sewer subject to a number of requirements.				
Z148	RTS	TfNSW	Traffic	Green Travel Plan	As part of the ongoing operation of the School, a detailed Green Travel Plan (GTP), which includes target mode shares for both staff and students with the objective to reduce the reliance on private vehicles, shall be prepared. The GTP must be implemented accordingly and updated annually.	Covered under Initial Audit and assessed as compliant: - Green Travel Plan provided in Response to Submission				
Z149	RTS	TfNSW	Traffic	Traffic and Parking Management Plan	The Applicant shall prepare a Traffic and Parking Management Plan, which details the measures to safely manage the daily transport task to/from the School for both the interim and final design. Traffic and parking management measures that need to be addressed include: • kerbside vehicle pick-up/drop-off management, staff parking management and orderly vehicle queuing; • maintaining bus accessibility and student waiting areas; • safe parent and student behaviour during pick-up/drop-off; and • safe pedestrian movements to the School entrances, minimising vehicle-pedestrian conflicts. The plan shall also detail the responsibilities of various personnel executing the plan and include measures to monitor, review the performance and make improvements to the plan. This plan should be implemented as part of the ongoing operation of the redeveloped School.	Covered under SSD condition C13, assessed as compliant.				
Z150	RTS	TfNSW	Amenity	Signage and Line-Marking Plan	The Applicant shall prepare a detailed signage and line-marking plan of the proposed changes to kerbside parking restrictions to accommodate the various vehicle movements to/from the development within the local road network. The preparation of the plan should be made in consultation with and approved by Woollahra Municipal Council. The approved kerbside parking restrictions must be implemented to the satisfaction of Council.	Covered under Initial Audit and assessed as compliant. Signage and line-marking plan provided in Appendix AA of RTS. Record sighted 14/09/20: - Woollahra Local Traffic Committee Minutes dated 1 September 2020 demonstrating Council approval.				
Z151	RTS	TfNSW	Amenity	Road safety evaluation	A Road Safety Evaluation (RSE, refer to NSW Centre for Road Safety Guidelines for Road Safety Audit Practices and Austroads Guide to Road Safety Part 6: Road Safety Audit) shall be conducted on all relevant sections of road utilised for bus and private vehicle pick-up and drop-off. This should be undertaken as part of the detailed design stage and upon completion of all relevant road works. Appropriate road safety measures and/or traffic management measures shall be implemented based on the outcomes of the RSE.	Covered under Initial Audit and assessed as compliant: - Road safety audit provided in Appendix CC of RTS.				
Z152	RTS	RMS	Amenity	-	Roads and Maritime raises no objection on property grounds provided all buildings and structures (other than pedestrian footpath awnings), together with any improvements integral to the future use of the site are wholly within the freehold property (unlimited in height or depth), along the New South Head Road boundary.	Covered under SSD condition A24 - assessed as compliant.				
Z153	RTS	RMS	Traffic	Construction Traffic Management	A Construction Traffic Management detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council prior to the issue of a Construction Certificate.	Covered under SSD condition C13 - assessed as compliant.				
Z154	RTS	OEH	Emergency	Emergency response	OEH highlights that, in assessing the overland flow for the full range of events (including the PMF) provides essential information to inform emergency management and recommends that an emergency response plan is prepared.	Record sighted: - Appendix F of CEMP provides Flood Emergency Response Plan. - Section 15 CEMP provides Environmental emergency. - Each subplan of the CEMP provides emergency response plan.				

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Z155	RTS	OEH	Biodiversit y		Replacement landscaping should keep in context with the existing character of the property. Construction sediment and erosion control measures are to be install and maintained in accordance with Managing Urban Stormwater: Soils and Construction (Landcom 2004) to minimise impact of possible construction sedimentation to local drainage and Sydney Harbour. Control and eradication of noxious and other invasive ecological weeds should be undertaken to prevent further invasion by these species. Invasive ecological weed species such as Camphor Laurel, Common Olive, Chilean Cestrum, Small-leaved Privet, Mickey Mouse Plant, Senna, Asparagus Fern, Fish-bone Fern, and Madiera Vine were observed with the subject site. A weed control plan be produced and enacted by the groundskeepers to control or eradicate noxious and environmental weeds which are required to be controlled in accordance with NSW Biosecurity Act (2015). As field actives may be ongoing until approximately 8pm, lighting on the field is required. Lighting should be turned off at other times to limit disturbances to on-site boarders, neighbours and fauna that may utilise the existing vegetation. Two (2) nest boxes currently located within the new building footprint are to be moved to nearby retained trees, or new nest boxes install as replacements nearby.	- Arcadia Landscape Masterplan (September 2018) approved by DPIE. - Observation during Audit (30/6/2020) indicated sediment and erosion control measures were adequate. - Novegetation including weeds was observed within construction site. - RCC email stating that there has not been an incidence of weed growth requiring a weed control plan. No weed reduction measures have been required to date. - Based on information by RCC, nest boxes had been relocated by Cranbrook. Photo of relocated possum nesting boxes were sighted (11/2/2020).				
Green Travel Plan										
Z156	RTS	Section 2 of Appendix E of RTS	Travel	Steps to develop a school green travel plan	- Step 1 - Set up an Advisory Committee - Step 2 - Data collection & review existing situation - Step 3 - Prepare school travel plan - Step 4 - Deliver & implement - Step 5 - Recognise process	This will be reviewed during operational phase - condition not yet triggered.				
Z157	RTS	Section 2 of Appendix E of RTS	Travel	Monitoring & review strategy	As required by the recommended condition of consent, an annual review of the GTP is required with demonstration on how mode share has changed over time (refer to section 1.1).	This will be reviewed during operational phase - condition not yet triggered.				
Construction Environmental Management Plan Mitigation Measures										
General										
Z158	CEMP	1.3	Admin	Hours of Work	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.	Covered under SSD condition D4 - Noted as compliant				
Z159	CEMP	1.3	Admin	Hours of Work	- When demolition, excavation and constructions works are to be undertaken on school days, all vehicular movements associated with this work shall only be undertaken between the hours of 7am and 8am, 9:00am and 2:30pm and 4:00pm and 5:00pm in order to minimise disruption to the traffic network during school pick-up and drop-off periods. - 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.	Covered under SSD conditions D5 & D8 - Noted as compliant				



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Z160	CEMP	3.1 & 3.2	Admin	Site inductions and training	All personnel, including the Principal Contractor’s staff and subcontractors, who will be working on the project or will require regular access to the sites will be required to undertake training and site inductions including environmental requirements as required by the Principal Contractor. The CEMP awareness induction will cover: 1. Outlining the objective and purpose of the works; and 2. Contents of the CEMP and their (the workers) responsibility. All site workers will sign the CEMP induction register acknowledging receipt and understanding of this CEMP. All induction sessions will be recorded in the induction register.	30/06/2020 Record sighted: - Site induction records maintained on Blueglue. June 2020 records sighted.  Richard Crookes Induction previously sighted.				
Z161	CEMP	3.3	Admin	Toolbox meetings	The Principal Contractor will also conduct toolbox meetings with all personnel to review management procedures and identify / discuss site conditions and potential hazards.	26/06/2020 Record sighted: - Toolbox talk records for 3, 17, and 24 June 2020 with attendance records				
Z162	CEMP	3.4	Safety	Personal Protective Equipment	All site personnel will be provided with, utilise, and be appropriately trained in the requirements of personal protective equipment (PPE). PPE requirements will depend on the activity or situation, but may include the following: • High visibility clothing; • Protective clothing and footwear; • Eye protection; • Respirable (half-face) masks as required; • Hard hat as required (i.e. in the vicinity of the working excavator or other overhead plant); and • Sun protection as required (long sleeves, sunscreen, hat or hard hat fitted with wide brimmed sun protection). Personnel will be trained in the requirements and use of PPE to an appropriate level according to responsibilities. PPE requirements should be detailed in the Safe Work Method Statements (or similar) which will be provided to the Principal Contractor for review and endorsement. Additional PPE will be required to carry out some aspects of the construction process and the PPE outline above should only be considered as the basic requirements. Additional PPE will be required if works are to be conducted in asbestos work environs.	30/06/2020 Observation: - During the Audit site inspection, site personnel were observed onsite wearing appropriate PPE for the conditions and as a minimum, high visibility clothing, protective clothing and footwear, eye protection, and hard hat.  26/06/2020 Record Sighted: - RCC document No. 40.4 Safe Work Method Statement Monitoring for traffic control and installing drainage pipe to b1 carpark dated 10 March and 23 April 2020 respectively.  30/06/2020 Record Sighted: - SWMS for Pro Electrical - date SWMS received 24/01/2020. Sign off sheet observed as current. MSDS register within.				
Z163	CEMP	3.5	Admin	Responsibility and reporting	The Principal Contractor is responsible for ensuring that all personnel under their jurisdiction have been provided with adequate training in the areas outlined in this document. The principal contractor will complete weekly safety and environmental walks, with the critical information included in the monthly report. The Principal Contractor will maintain records of all personnel who have undergone training in relation to the CEMP and general environmental responsibilities. Records of trained personnel will be maintained in a log to be kept on site. A record of issues covered in toolbox meetings will be maintained.	26/06/2020 Record sighted: - Daily perimeter inspection checklists provided for 26-29 May 2020. - Appropriate licence cards were provided for the engaged traffic controllers. - A site induction register was provided for review which is maintained by Blueglue, an online service. - Twice monthly enviro reports provided for 19 and 26 February and March 2020.  Toolbox talks see Z161.				
Z164	CEMP	5	Safety	Occupational health and safety	Contractors will be required to prepare their own Safe Work Method Statements for their work activities.	30/06/2020 Record Sighted: - SWMS for Pro Electrical - date SWMS received 24/01/2020. Sign off sheet observed as current. MSDS register is also provided within the same register.				
Air Quality										

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Z165	CEMP	7.1	Air	Management actions	Use of surfactant spray (onsite in close proximity of the earth works and at the site boundary/fences) is required for odour suppressant during works (this is up to the discretion of the Project Manager and the environmental consultant). Heavy equipment and vehicles will be appropriately maintained to minimise exhaust emissions. Appropriate methods of dust suppression will be implemented, such as ensuring earthworks materials remain moist to ensure dust is minimised during works. Evaluate weather conditions prior to works commencing and during any change in wind direction. Cease works if dust or odour generation is excessive. Covering of any stockpiles that are to remain for greater than two days (Waste reclassification or ENM stockpiles, ACM demolition stockpiles), or if weather forecasts predict strong winds; with plastic or Hessian material. All dust/odour control measures will be kept in good operating condition and be functional at all times, with regular maintenance. All loads are to be covered and appropriately fitted with tarpaulins to contain dust and/or odour during transport. A complaints register will be established and maintained to receive and address complaints from the community regarding the detection of nuisance odour during the works. Residents in the vicinity of the proposed works will be informed of potential dust/odour impacts prior to the commencement of works.	30/06/2020 Observation: - Waste was observed segregated in designated waste storage areas. - A stockpile of waste observed. No cover was placed on the stockpile, however, it was noted that covering would be impractical as the stockpile was continuously taken from and placed in trucks for offsite disposal. - No notable odours were observed during the Audit inspection. - Heavy equipment and vehicles appeared to be in appropriate condition. - All trucks leaving site were observed to have covered loads.  26/06/2020 Record Sighted: - Dust (aerosol) monitoring data provided for 23-29 March, 13-30 April, and 1-3 June 2020. - Complaint register was provided which had 11 complaints during the current Audit Period. No complaints in relation to odour or dust were reported for the current Audit Period. - Environmental inspections for 19 & 26 February and 19 & 26 March 2020. - Daily perimeter inspection checklists provided for 26-29 May 2020.				
Z166	CEMP	7.1	Air	Performance indicator	No complaints from location residents, surrounding businesses or site personnel. Goal of nil complaints relating to dust quality issues. Vapour emissions (Chlorinated VOCs) are likely to occur however the number of complaints should be kept to a minimum. All complaints will be responded to within 2 business days No onsite observation of dust generation during excavation works by Project team. No visual evidence of exhaust smoke during idle of equipment. No visual evidence of tracked material on public roads. A reduction in the number of complaints received in relation to air quality each month.	30/06/2020 Observation: - No excess dust generation was observed during the Audit inspection. - No exhaust smoke observed originating from idle equipment. - Public roadways around the site appeared free of dirt tracking.  26/06/2020 Record Sighted: - Dust (aerosol) monitoring data provided for 23-29 March, 13-30 April, and 1-3 June 2020. - Complaint register provided. No complaint received related to dust for the Audit Period. - Environmental inspections for 19 & 26 February and 19 & 26 March 2020. - Daily perimeter inspection checklists provided for 26-29 May 2020.				
Z167	CEMP	7.1	Air	Monitoring	Implementation of visual monitoring of dust, material tracking, truck tarping, water spray use, exhaust plumes and stockpile covering. If unexpected fines protocol detects contaminants a review of air born testing is to be undertaken.	See Z165 and Z166. 26/06/2020 Record sighted: - RCC email stated that there have been no unexpected finds encountered to date.				
Z168	CEMP	7.1	Air	Reporting	Maintenance of records on site of visual, PID and Asbestos monitoring undertaken if required.	26/06/2020 Record Sighted: - Dust (aerosol) monitoring data provided for 23-29 March, 13-30 April, and 1-3 June 2020. - Environmental inspections for 19 & 26 February and 19 & 26 March 2020. showing visual evidence of dust.				
Community Consultation and Complaints Handling										

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Z169	CEMP	8.3	Consultation	Letterbox drops and public notices	Letter box drops or public notices will include at least the following: - Why the works are required; - When they are likely to occur; - What mitigation measures are in place to minimise any community or environmental impacts; - Who will be doing the work and a contact phone number for further information; and - Emergency Contact number / community complaints line.	Covered under SSD Condition D18 and assessed as compliant.				
Z170	CEMP	8.4	Consultation	Communication protocols	For this project noting that a 2 day response time to deal with community concerns has been determined.	26&30/06/2020 Record sighted: - Complaints register provided that spans the duration of the Stage 2 Development. At the time of the Audit there were 20 complaints documented 11 of which were reported during the current Audit Period.  It is noted that while complaint No. 13 (dated and notified to RCC on 13 March 2020) and responded to by RCC on 16 March 2020, 14 and 15 March comprised weekends.				
Z171	CEMP	8.6	Admin	Complaints handling	If a complaint is received, the complaint should be recorded. The complaint form should list: • The name and address of the complainant (if provided); • The time and date the complaint was received; • The nature of the complaint and its particulars (including time & date); • The name of the individual who received the complaint; • Actions taken to investigate the complaint, and a summary of the results of the investigation	26&30/06/2020 Record sighted: - Complaints register provided that spans the duration of the Stage 2 Development. At the time of the Audit there were 20 complaints documented noting 11 new complaints since the previous Audit and during the Audit Period. The register does not provide for * The time AND date upon receipt of a complaint, * The name and address of the complainant * The name of the individual who received the complaint.  Whilst the register does not provide the time, name and address of the complainant it is understood that: exact times are difficult to obtain; the name and address of the complainant is sensitive and given that the complaint register is publicly available it is considered inappropriate to include this information. For the purposes of this Audit, the complaint register is considered to contain sufficient information.				
Stormwater Control & Discharge: Surface Water										



Zoic No.	Document	SSD Conditio n / CEMP Section	Category	Item	Condition	Evidence Collected / Observations	Comments on Independent Audit Findings and Recommendations	Compliance Status		
								Compliant	Non-Compliant	Not Triggered
Z176	CEMP	10.2	Sediment	Managemen t actions	Prior to the start of the works a stormwater and sediment control plan should be prepared by the Principal Contractor. This Plan should be in accordance with Councils regulations. Site contractors will be required to observe any increases in sediment load in storm water drains when excavations are close to surface drains or waterways. Sediment control structures (i.e. silt fencing and/or hay bales) should be implemented in accordance with the Stormwater and Sediment Control Plan prior to the commencement of works. Evaluate weather conditions prior to works commencing and during any change in wind direction. Cease works if dust generation is excessive (by visual assessment). Covering of any stockpiles that are to remain for greater than two days, or if weather forecasts predict strong winds; with plastic or Hessian material. All sediment control measures will be kept in good operating condition and functional at all times, with regular maintenance. Strategic placement of such structures down-gradient of stockpiles and slopes to minimise sediment entrainment. These measures should also be placed on the up-slope side of any storm water collection channels. If a significant rain event occurs, fieldwork will cease. There will be sediment control measures available for placement down gradient of the work area; and Works will also be conducted in a manner to minimise the potential for sediment and soil migration, whereby excavated material will be hauled offsite as soon as practicable and/or reinstated and compacted.	See Z172 regarding sediment control.  30/06/2020 Observation: - Kerbside drains on public roadways were observed to be clear and free of sediment loads.  26/06/2020 Record Sighted: - Environmental inspections for 19 & 26 February and 19 & 26 March 2020. - Daily perimeter inspection checklists provided for 26-29 May 2020.				
Z177	CEMP	11.2	Sediment	Performanc e indicator	The prevention of sediment runoff is the best approach. Site contractors will be required to observe any increases in sediment load in storm water drains when excavating close to surface drains and site boundaries. No complaints from location residents, surrounding businesses or site personnel. Goal of nil complaints relating to sediment issues. No onsite observation of dust generation during excavation works by Project team. No visual evidence of tracked material on public roads.	30/06/2020 Observation: - downgradient kerbside drains on public streets adjacent to the site were observed to be free of sediment loads and streets appeared largely clear of any tracking of material from the site.  See Z172 regarding sediment control.  26/06/2020 Record Sighted: - Environmental inspections for 19 & 26 February and 19 & 26 March 2020. - Daily perimeter inspection checklists provided for 26-29 May 2020. - Site complaint register provided - no complaint received regarding sediment during the Audit Period.				
Z178	CEMP	12.2	Sediment	Monitoring	Regular observations will be made by the Site Manager and mitigation measures put into place if sediment loaded runoff is likely to occur or a rainfall event is predicted. Records of all corrective actions and known sediment releases will be kept. Implementation of visual monitoring of dust, material tracking, truck tarping, water spray use, exhaust plumes and stockpile covering.	See Z177 - assessed as compliant				

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Z179	CEMP	13.2	Sediment	Reporting	Maintenance of records on site of visual monitoring undertaken	26/06/2020 Record Sighted: - Environmental inspections for 19 & 26 February and 19 & 26 March 2020. - Daily perimeter inspection checklists provided for 26-29 May 2020. - Site complaint register provided - no complaint received regarding sediment during the Audit Period.				
Waste Management										
Z180	CEMP	11.2	Waste	Management actions	Provision of a Spill cleanup kit on all sites where bulk fuel is stored or is being transferred. Maintain a hardstand or lined and bunded area for the refueling and storage of equipment. Visual assessment of excavated material by the Environmental Specialist. The Environmental Specialist shall direct the Excavator Operator if the soil has to re-assessed onsite or disposed off-based on the in-situ waste classification. Trucks to be used for transport of soil are to be fitted with cover tarpaulins to contain the load. Each truck prior to exiting site, shall be inspected prior to dispatch and either logged out as clean (wheels and chassis), or hosed down within a wheel wash down bay. Provide waste receptacles for all waste types and ensure that personnel use these correctly. All trucks leaving the site should be accompanied with a waste transportation form (Appendix B). Cease site works until the Project Manager has been notified of any unexpected finds and appropriate instructions have been provided to field personnel to address the issue. Project Manager to inform the Contract Administrator of any unexpected finds.	See Z172 on refuelling and spill kit.  30/06/2020 Observation: - Truck loads were noted as covered. - Wheel wash and cattle grid noted at site exit. - Segregated waste receptacles were observed and appeared to be used correctly.				
Z181	CEMP	11.2	Waste	Monitoring	Regular observations will be made by the Project Manager and measures put into place if sediment loaded runoff is likely to occur or a rainfall event is predicted. Records of all corrective actions and known sediment releases will be kept. An up to date record of waste tracking shall be kept by the Environmental Specialist.	26/06/2020 Record Sighted: - Environmental inspections for 19 & 26 February and 19 & 26 March 2020. - Daily perimeter inspection checklists provided for 26-29 May 2020. - Site complaint register provided - no complaint received regarding sediment during the Audit Period. - Waste tracking record covered under Item Z108 - considered compliant.				
Z182	CEMP	11.2	Waste	Reporting	Maintenance of records on site of equipment inspections undertaken and landfill disposal/waste tracking and weigh bridge dockets, and any council approvals should be maintained onsite for inspection.	26/06/2020 Record Sighted: - Equipment and plant maintenance record covered under Item Z81 (SSD Condition D2). - Waste tracking record covered under Item Z108 (SSD Condition D8) - considered compliant.				

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Z183	CEMP	Section 2 of Appendix E	Waste	Demolition plan	- Demolition disposal for concrete, bricks, plasterboard, timber, tiles, PVC, metal, paper & cardboard, glass, appliance, carpet, vegetation, soil – to Recycled Facility - Asbestos ACM to be removed by a licenced contractor (up to 30 June 2007 >200m2, 1 July 2007 > 50m3, from 1 Jan 2008 > 10m2 of bonded asbestos) & managed in accordance with WHS Act & Regulation 2012 and EPA requirements. - Lead paints & dusts will be removed using we sanding and vacuum techniques (cleaners which comply with AS/NZS 3544 Industrial vacuum cleaners for particulates hazardous to health). Waste will be contained within sealed plastic bags for disposal. Clean up with a wet mop.	Covered under Item Z108 - Noted as compliant				
Z184	CEMP	Section 2 of Appendix E	Waste	Consider recycling reprocessing	Where practicable: - Timber for reuse or mulching - Aluminium wall frames – reprocess - Plasterboard – recycled or use as soil improvers - Steel – reprocess - Toughened Glass – reprocess - Carpet & underlay – reprocess & mulch mats	5/2/2020: No construction waste is produced as work currently comprises civil works. Item considered non-triggered.				
Z185	CEMP	Section 2 of Appendix E	Waste	Product stewardship	Investigate returning waste to the supplier? (e.g. plasterboard, packaging)	5/2/2020: No construction waste is produced as work currently comprises civil works. Item considered non-triggered.				
Z186	CEMP	Section 2 of Appendix E	Waste	Putrescible waste	Putrescible waste is to be contained in bins and collected by licenced contractor for disposal	26/06/2020 Record sighted: - DumpIT Bins waste summary for April and May 2020 with waste stream breakdown, quantity, and fate.				
Z187	CEMP	Section 2 of Appendix E	Waste	Contaminated soils	Contaminated soils will be excavated and classified in accordance with EPA guidelines "Environmental Guidelines: Assessment, Classification & Management of Liquid & Non-Liquid Wastes" (June 2004) – <a href="http://www.environment.nsw.gov.au/waste/envguidlns/index.htm">www.environment.nsw.gov.au/waste/envguidlns/index.htm</a> .	Covered under SSD Condition D29 - Noted as compliant.				
Z188	CEMP	Section 2 of Appendix E	Waste	Virgin excavated natural material (VENM)	VENM excavated from site with suitable compaction qualities will be beneficially re-used on other construction sites whenever possible. Disposal to landfill will be the last option. No fill will be received on site that does not comply with EPA guidelines i.e. Contamination limits appropriate to the development.	Covered under SSD Condition D24 - Noted as compliant.				
Z189	CEMP	Section 2 of Appendix E	Waste	Acid sulphate soils	Potential for acid sulphate soils ASS will be assessed based on the sites proximity to low-lying coastal areas e.g. coastal plains, wetlands and mangroves where the surface elevation is less than five metres above mean sea level. If suspected, consultant to prepare Acid Sulphate Soil Management Plan (ASSMP). Excavation and neutralisation to be supervised by consultants as per ASSMP.	Appendix R of EIS states that acid sulfate soil management plan is not required. Item considered non-triggered.				
Z190	CEMP	Section 2 of Appendix E	Waste	Monitoring	Bin(s) with heavy lids shall be provided for putrescibles waste Daily inspections shall be carried out to ensure the worksite is litter free.	30/06/2020 Observation: - In general, the site appeared to be litter free. - Heavy lids for putrescible wastes were observed.  26/06/2020 Record sighted: - Daily perimeter inspection checklists provided for 26-29 May 2020.				
Z191	CEMP	Section 2 of Appendix E	Waste	Reporting	Waste reports/management plans indicate estimated waste min (80%) of accumulated totals for the project.	19/06/2020 Record Sighted: DumpIT Bins/ DumpIT Recycling Centre waste stream summary for the months of April and May 2020. 96-97% of waste was recycled.				



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Z192	CEMP	Section 2 of Appendix E	Waste	Non-compliance	Generation of water pollution and/or air pollution from onsite waste storage Inappropriate/illegal off-site disposal of waste materials Asbestos & CCA treated timber contamination of recoverable waste stream thereby requiring landfill disposal.	30/06/2020 Observation: - Waste storage bins were contained and no evidence of water or air pollution was noted from the mode of storage.  19/06/2020 Record sighted: - DumpIT Bins/ DumpIT Recycling Centre waste stream summary for the months of April and May 2020. - Daily perimeter inspection checklists provided for 26-29 May 2020.				
Z193	CEMP	Section 2 of Appendix E	Waste	Emergency response	No specific requirements associated with waste management Scenarios such as spill, fires, explosions covered by the project emergency response plans.	Item not required for waste.				
Z194	CEMP	Section 3 of Appendix E	Waste	Reporting	The Project Green Star Administrator will be responsible for collecting monthly waste reports (Form 18.1) or utilising the waste subcontractor reporting format and issuing them to the Project Manager. These reports will measure the weight of waste generated of material by classification, total weight of waste, percentage by weight recycled and percentage by weight to landfill.	Covered under Item Z108 (SSD Condition D29) and assessed as compliant.				
Z195	CEMP	Section 5.1 of Appendix E	Waste		- Consideration should be given to the removal of ACM during any renovations, refurbishments or maintenance work in preference to other control measures such as encapsulation, enclosure and sealing. - The WHS Regulation requires all ACM within the construction area to be labelled. (Refer 6.3 Labelling) - Where ACM is identified or presumed, the locations and type of ACM are to be recorded in the ACM Register located within the Asbestos management plan folder. - A risk assessment must be performed on all identified or presumed ACM. - Control measures must be established to prevent exposure to airborne asbestos fibres and should take into account the results of risk assessments conducted for the identified or presumed ACM. - All workers and contractors on site etc. must be advised of the ACM Register at time of induction, and as requested, permitted access to the register for their review - Only competent persons should undertake the identification of ACM. - All workers and contractors on site where ACM are present or presumed to be present, and all other persons who may be exposed to ACM as a result of being on the premises, must be provided with full information on the occupational health and safety consequences of exposure to asbestos and appropriate control measures. The provision of this information should be recorded. - Reasonable steps must be taken to identify all possible locations of ACM within the site. - Once a risk assessment has been completed and controls established, a SWMS is to be developed and submitted to RCC'S site management team for approval	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils. Item considered compliant as asbestos inspection has been conducted by ECS.				

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Z196	CEMP	Section 5.2 of Appendix E	Waste	Control of Asbestos Hazards	- If the ACM is friable, and there is a risk to health from exposure, it should be removed. - If the ACM is bonded and in a stable condition, encapsulation may be appropriate if the ACM is unsealed. Encapsulation is not necessarily required if the ACM is unsealed but it does provide another “barrier” to the potential release of asbestos fibre as well as prolonging the lifespan of the material by providing protection against UV and environmental elements etc. - ACM that are bonded, stable and sealed, which are unlikely to be disturbed during normal activities, can be left in-situ and managed, but need to be recorded in the ACM Register. - ACM within the works zone must be removed prior to the commencement of demolition, partial demolition, renovation or refurbishment if they are likely to be disturbed by those works. This is in accordance with the NOHSC Code of Practice for the Safe Removal of Asbestos [NOHSC: 2002 (2005)].	30/06/2020 Record sighted: - ECS (23 June 2020) 'Retaining Wall Material, Cranbrook School Bellevue Hill'. The report provides the findings for the investigation of the sand from around a concrete footing/wall at the southern end of the development. The report did not identify any hazardous materials.	Recommendation: RCC to provide asbestos clearance on removal of the slab. Slab only partially removed. Clearance to be provided and reviewed in subsequent Audit.			
Z197	CEMP	Section 5.3.1 of Appendix E	Waste	Licensed contractors	If the ACM is classified as friable (e.g. sprayed limpet, pipe lagging, millboard insulation, vinyl sheet floor coverings with asbestos backing material, etc.) it is necessary to engage a contractor who holds a current AS-A class license for friable asbestos removal. The holder of an AS-A licence is also permitted to removed Bonded ACM If the ACM is classified as bonded ACM (e.g. asbestos cement wall linings, Super Six roof sheeting, vinyl floor tiles, Zelemite electrical boards, etc.) the ACM may be removed by the contractor who holds a current AS-B licence for bonded asbestos removal. The holder of an AS-B licence is not permitted to remove friable ACM.	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils. Item considered non-triggered.				
Z198	CEMP	Section 5.3.2 of Appendix E	Waste	WorkCover - Notification	For Bonded ACM, in quantities greater than 10m², requiring a licensed contractor (AS-B) to complete the removal works, a WorkCover Notification is required to be lodged by the Licensed Contractor. The Notification is required to be lodged a minimum of seven (7) working days prior to starting the removal works. RCC will require a copy of the WorkCover stamped 'Notification' prior to issuing an RCC Asbestos removal permit.	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils.				
Z199	CEMP	Section 5.3.3 of Appendix E	Waste	WorkCover - Permit	For all Friable removal works, regardless of quantity, a suitably licensed contractor (AS-A) must apply to WorkCover for a Permit prior to removal works progressing. The Permit application is required to be lodged a minimum of seven (7) working days prior to starting the removal works. RCC will require a copy of the WorkCover 'Permit' and the application form prior to issuing an RCC Asbestos removal permit.	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils.				
Z200	CEMP	Section 5.3.4 of Appendix E	Waste	Airborne fibre monitoring	Airborne fibre monitoring must be conducted during and after the removal of all friable ACM by an independent competent person. For Bonded ACM, air monitoring is conducted as part of the clearance certificate (where required) or as requested by RCC, client or Hygienist. Air monitoring is conducted during the removal works to check the effectiveness of control measures implemented by the contractor (e.g. isolating the removal work area with a sealed, airtight enclosure fitted with negative air generating units, etc.). Air monitoring is also conducted after the ACM has been completely removed and the work area has passed a satisfactory visual inspection to determine whether the area is safe to reoccupy by unprotected persons.	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils.				

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Z201	CEMP	Section 5.3.5 of Appendix E	Waste	Clearance certificates	For all Friable ACM removal works or, as requested by the client or RCC for Bonded works, before an area can be re-occupied post asbestos removal, a clearance inspection must be carried out. The clearance inspection must be undertaken by an independent competent person only and a clearance certificate must be obtained from that competent person. Clearance monitoring is a mandatory requirement for all friable asbestos removal works and is recommended for bonded ACM removal works particularly when the bonded ACM is located internally or near sensitive receptors. The complete removal of all ACM must be verified with a written clearance certificate which must include details of a satisfactory clearance inspection conducted by the independent competent person. If clearance air monitoring has been conducted, the results of the clearance monitoring must be included as part of the clearance certificate as well.	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils. Final clearance certificate is to be provided following removal of all slab. This condition will be reviewed following removal of slab.	Recommendation: Clearance certificate will be reviewed following removal of slab.			
Z202	CEMP	Section 5.3.6 of Appendix E	Waste	Waste	All asbestos waste shall be disposed of at an approved landfill disposal site by licensed contractors, and in accordance with the requirements of The Legislation. Transport and disposal of asbestos waste shall be carried out only in a manner that will prevent the liberation of asbestos fibres in to the atmosphere. A copy of the EPA Waste Tracking document is the required documentation for disposal, and a copy of the necessary License for carrying out this removal and disposal is the required documentation for transportation.	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils. Item considered non-triggered.				
Z203	CEMP	Section 5.4 of Appendix E	Waste	Record keeping	RCC shall maintain detailed records of all activities relating to asbestos works which have been undertaken on site. The records kept should include: - Copies of all asbestos survey/audit reports, including updates and amendments. (RCC ACM Registers) - Copies of all WorkCover notifications and permits - Risk Assessments and SWMS documents. - RCC Asbestos removal permits - RCC Air Monitoring and Clearance certificate records - Records pertaining to the informing of employees/contractors about the presence of asbestos on site, and those employees have been appropriately trained in safe work procedures and practices. - Clearance certificates indicating areas are safe to reoccupy after asbestos abatement works; and - Airborne fibre monitoring results - Previous versions of the asbestos register	30/06/2020 Record sighted: - ECS (23 June 2020) 'Retaining Wall Material, Cranbrook School Bellevue Hill'. The report provides the findings for the investigation of the sand from around a concrete footing/wall at the southern end of the development. The report did not indicate any hazardous materials.	Recommendation: RCC to provide asbestos clearance on removal of the slab. Slab only partially removed at time of audit. Clearance to be provided and reviewed in subsequent Audit.			
Z204	CEMP	Sections 5.5 & 5.6 of Appendix E	Waste	Labelling, Warning Signs	RCC has advised that individual labelling of ACM is to be determined by a Competent Person usually nominated by the client however may not be necessary in every instance. All friable and high risk asbestos situations, as well as any location containing ACM's where regular maintenance or repair work is likely to be carried must be labelled. In locations where ACM has been identified within close proximity to the work area, but not required to be removed or disturbed, should be labelled or sign posted warning of 'Asbestos containing material, do not disturb' or in wording similar. All site areas which are known or suspected to contain ACM's shall have a warning sign at every main entry into the area indicating that an asbestos register exists for the site and a point of contact must be contacted before undertaking any works.	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils. Item considered non-triggered.				

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Z205	CEMP	Section 5.7 of Appendix E	Waste	Safe work practices	If a project is likely to impinge upon ACM the principal contractor (RCC) must assess the requirement for a licensed asbestos removalist to perform the asbestos removal work. A WorkCover permit / Notification may be required as part of an RCC, Asbestos Permit to work, prior to the asbestos removal work commencing.	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils. Item considered non-triggered.				
Z206	CEMP	Section 5.7.2 of Appendix E	Waste	Tools and equipment	At the end of the removal work, all tools should be: - Decontaminated (i.e. fully dismantled and cleaned under controlled conditions as described in the Code, or - Disposed of in sealed containers similar to that for disposal of the ACM waste product. Vacuum cleaners used for asbestos cleaning must comply with: - AS 3544-1988 (Industrial Vacuum Cleaners for Particulates Hazardous to Health) and - AS4260-1997 High Efficiency Particulate Air Filters (HEPA) - Classification, construction and performance.	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils. Item considered non-triggered.				
Z207	CEMP	Section 5.7.3 of Appendix E	Waste	RCC asbestos removal permit	- An RCC Asbestos Removal Permit form must be completed for any work on ACM. Before being issued with an Asbestos Removal Permit, individuals will be required to peruse the RCC Asbestos Management Plan and the Asbestos Register. Where practicable, contractors should be made aware of the requirements of the plan prior to tendering to ensure they allow for such requirements when quoting. - RCC's Site Manager or HSE Coordinator shall be advised immediately of any incidents of non-compliance with the RCC Asbestos Management plan or the Code	26/06/2020 Record sighted: - RCC Email statement that there has been no asbestos found to date since the last audit. - Environmental Consulting Services (ECS) letter dated 23 June 2020 for the retaining Wall Material - no asbestos detected in proximate soils. Item considered non-triggered.				
Monitoring Requirements										
Z208	CEMP	14.1	Admin	Auditing and Records	The Client Project Manager will conduct regular audits of the Principal Contractors implementation of the CEMP. Audits will involve a review of all environmental documents, records and reports to ensure compliance with the requirements of the CEMP. If non- compliance is detected, the Principal Contractor will initiate to the satisfaction of the Client Project Manager the appropriate corrective action. Key environmental and procedural issues to be covered by the audit will include, but may not be limited to: • Environmental management measures presented in Environmental Elements 1 to 7; • Environmental management measures presented in the AMP; • Adherence to reporting procedures; • Complaint and incident management; and • Legislative requirements.	2/7/2020: Record sighted: - EPM (18 June 2020) Cranbrook School Redevelopment Project Construction Compliance Report. Out of 179 conditions, 113 conditions were deemed compliant and the remainder non-triggered. No non-compliance was identified.				

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Z212	CEMP	Section 8.1 of Appendix D	Noise	Site specific recommendations	All demolition/excavation/construction activities are to occur during the authorised hours of construction. • Excavation: - Use of rippers (as opposed to pneumatic hammers) is recommended whenever possible to minimise noise and vibration generation. • All plant/equipment shall be maintained as per noise control methods and procedures outlined in section 9.3 below. • Vehicle Noise: - Truck movements should not commence prior to 7:00am, and should not idle outside the site prior to 7am. - All vehicles (excavators, bobcats, trucks, concrete trucks etc.) must turn off their engines during idling, to reduce impacts on surrounding receivers (unless truck ignition needs to remain on during concrete pumping). • Crane: - If practicable, an electric crane should be used (as opposed to a diesel crane).	30/06/2020 Observation: - No excessive noise was observed as a result of construction activities.  30/06/2020 Record sighted: - Sign in/sign out register provided showing general compliance with approved hours. - RCC provided comment that sign in/out times that were outside of the approved hours was due to construction workers arriving early to have breakfast and prepare for their shift and/or office workers staying back past 6pm and that no construction work occurred outside of approved hours unless approved.				
Z213	CEMP	Sections 8.2, 9.2 & 10 of Appendix D	Noise	Management of noise emissions and complaints handling	- Should ongoing complaints of excessive noise occur, immediate measures shall be undertaken to investigate the complaint, the cause of noise exceedances and identify the required changes to work practices. - All complaints or offensive noise received should be fully investigated and reported to management. - The complainant should also be notified of the results and actions arising from the investigation. - Where an item of plant is found to be emitting excessive noise, the cause is to be rectified as soon as possible. - Where work practices within established guidelines are found to result in excessive noise being generated then the guidelines should be modified so as to reduce noise emissions to acceptable levels. - Where guidelines are not being followed, the additional training and counselling of employees should be carried out. - Measurement or other methods shall validate the results of any corrective actions arising from a complaint where applicable. - Complaints associated with noise and vibration generated by site activities shall be recorded on a Noise Complaint Form. The person(s) responsible for complaint handling and contact details for receiving of complaints shall be established on site prior to construction works commencing. A sign shall be displayed at the site indicating the Site Manager to the general public and their contact telephone number.	26/06/2020 Record sighted: - Complaints register for the site. One entry for noise that was for works outside construction hours however it was within an out of hours works permit.				
Z214	CEMP	Section 8.3 of Appendix D	Noise	General recommendations	- Selection of alternate appliance or process - Acoustic barrier - Silencing devices - Material handling - Treatment of specific equipment - Establishment of site practices - Strategic positioning of processes onsite - Regular noise checks of equipment	30/06/2020 Observation: - Hoarding around the perimeter of the construction site provides some acoustic buffer. - When not in use equipment and vehicles were switched off. - Noise exceeding reasonable construction levels was not observed during the Audit inspection.  26/06/2020 Record sighted: - Complaints register for the site. One entry for noise that was for works outside construction hours however it was within an out of hours works permit.				



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Z215	CEMP	Section 9.1 of Appendix D	Noise	Establishment of direct communication with affected parties	- To ensure that this process is effective, regular scheduled meetings will be required for a finite period, until all issues have been addressed and the evidence of successful implementation is embraced by All parties. - An additional step in this process is to produce a newsletter informing nearby residents of upcoming activities that are likely to generate higher noise/vibration levels.	30/06/2020 Record sighted: - RCC provided a 'Construction Update - Vibratory Works' letter drop flyer dated 9 June 2020 for the residents of Bellevue Hill. - Screenshots of the school newsletter were provided demonstrating communication with the school parents and students.				
Z216	CEMP	Section 10 of Appendix D	Noise	Contingency plans	Where non-compliances or noise complaints are raised the following methodology will be implemented. 1. Determine the offending plant/equipment/process. 2. Locate the plant/equipment/process further away from the affected receiver(s) if possible. 3. Implement additional acoustic treatment in the form of localised barriers, silencers etc. where practical. 4. Selecting alternative equipment/processes where practical 5. Setup noise monitoring devices at locations represent nearest noise receivers and provide noise data for each complain time period. Analysis is required and determine suitable noise mitigation measures.	26/06/2020 Record sighted: - Complaints register for the site. One entry for noise that was for works outside construction hours however it was within an out of hours works permit.				
Construction Traffic Management Plan										
Z217	CEMP	Section 5.2 of Appendix C	Traffic	Hours of work	All works, associated with the project will be restricted to the time periods by the Conditions of Consent. In accordance with Condition D4 the hours of work are stipulated as follows: - Monday to Friday 7:00am to 6.00pm; - Saturdays 8.00am to 1.00pm; - Sunday or public holidays No works to be undertaken without prior approval Additional to these timings, when demolition, excavation and construction are undertaken on school days, all vehicular movements associated with the construction shall only be undertaken between 7.00am – 8.00am, 9.00am – 2.30pm and 4.00pm and 5.00pm (to minimise disruption to the traffic network during school drop off and pick up periods). Also, rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between; 9.00am – 12.00pm and 2.00pm – 5.00pm, Monday to Friday and 9.00am – 12 pm on Saturdays.	Covered under SSD Conditions D4, D5, D8 and assessed as compliant.				
Z218	CEMP	Section 5.3 of Appendix C	Traffic	General requirements	In accordance with Road and Maritime Services (RMS) requirements, all vehicles transporting loose materials will have the entire load covered and/or secured to prevent any large items, excess dust or dirt particles depositing onto the roadway during travel to and from the site. Vehicles operating to, from and within the site shall do so in a manner, which does not create unreasonable or unnecessary noise or vibration. No tracked vehicles will be permitted or required on any paved roads. Public roads and access points will not be obstructed by any materials, vehicles, refuse skips or the like, under any circumstances.	Covered under SSD Condition D22 and assessed as compliant.				



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Z219	CEMP	Section 5.4 of Appendix C	Traffic	Constructio n vehicle types	A management system will be put in place to: <ul style="list-style-type: none"><li>• Stagger all contractors' deliveries to ensure that back logs do not occur with multiple deliveries arriving at the same time.</li><li>• The provision of standing areas within the site, for vehicles up to Truck and Dog to wait to be loaded/unloaded.</li><li>• Traffic control measures to be in place at all entry and exit points to the site outlined in Section 5.7.</li></ul>	30/06/2020 Observation: <ul style="list-style-type: none"><li>- Traffic control measures observed in place at entry and exit points.</li><li>- Areas for truck and dog / vehicle standing observed.</li><li>- No back log of multiple deliveries observed.</li></ul> 26/06/2020 Record sighted: <ul style="list-style-type: none"><li>- The site uses a shares delivery booking planning software that blanks out not permitted delivery times and shows when others have planned deliveries to ensure that there is no backlog.</li></ul>				
Z220	CEMP	Section 5.7 of Appendix C	Traffic	Traffic control measures	Traffic control will be provided for access and egress to all gates and work zones will be in accordance with the RMS Guide to Traffic Control at Work Sites. All gates and work zones will be managed by traffic controllers at all times. In addition, it is proposed to provide three 'passing bays' on the eastern side of Rose Bay Avenue and restrict parking on a section of the western side of Rose Bay Avenue, to assist vehicles travelling along Rose Bay Avenue towards the Victoria Road/Rose Bay Avenue intersection. The bays will be placed opposite Gate 2A, Gate 2B and Gate 4 and will be accommodated by placing 'No Stopping' restrictions on the carriageway edge. Traffic management will be provided on the approaches to each gate and work zone on Rose Bay Avenue in accordance with TCP 77 and TCP 195 and a traffic controller will be provided at each gate and work zone. (refer to Attachment 2)	30/06/2020 Observation: <ul style="list-style-type: none"><li>- Traffic controllers were observed</li><li>- Traffic signage was observed in accordance with the TMP.</li><li>- Kiss and drop zone sign placed.</li></ul>				
Z221	CEMP	Section 5.8 of Appendix C	Traffic	Work zones	A 40m work zone is proposed adjacent to Gate 2 and a 25m work zone is proposed adjacent to Gate 3. The work zone operational hours are proposed as shown below: <ul style="list-style-type: none"><li>• Monday to Friday 7:00am to 6.00pm;</li><li>• Saturdays 8.00am to 1.00pm;</li><li>• Sunday or public holidays No works to be undertaken without prior approval</li></ul> Outside these hours, the kerbside lane within the Works Zone shall be clear of all vehicles, equipment and debris. The works zone shall be limited to vehicles no longer than an 19m Truck and Dog. All loading/unloading shall occur wholly within the Works Zone or development site.	30/06/2020 Observation: <ul style="list-style-type: none"><li>- The work zones were observed to be in operation during the Audit inspection and were noted to be free of debris.</li></ul> Record for sign in is covered under review of Condition D4.				
Z222	CEMP	Section 5.10 of Appendix C	Traffic	Pedestrian movement	Pedestrian access to the school and the surrounding pedestrian network is to be maintained at all times. Students will be instructed to only exit the Rose Bay Ave Gate westbound (toward Victoria Road) and internal signage will be provided to instruct students of this restriction. This should remove student pedestrian movements along Rose Bay Avenue along the construction site frontage and the Site Access Gates.	30/06/2020 Observation: <ul style="list-style-type: none"><li>- Pedestrian access to the school and surrounding pedestrian network was observed to be maintained.</li></ul> 8/7/2020 Record sighted: <ul style="list-style-type: none"><li>- Photograph of the site access gate with pedestrian barriers.</li></ul>				
Z223	CEMP	Section 5.11 of Appendix C	Traffic	Special deliveries	Any oversized vehicle (including cranes) that are required to travel to the site will be dealt with the submission of required permits to and subsequent approval by relevant authority prior to any delivery. Requests shall be submitted 28 days prior to the scheduled date of use of an oversized vehicle.	26/06/2020 Record sighted: <ul style="list-style-type: none"><li>- Overmass/oversize permit from RMS date of issue 19 March 2020 for 19 March to 18 June 2020.</li></ul>				
Z224	CEMP	Section 5.13 of Appendix C	Traffic	Work site security	To provide security to the works site and protection to the general public and during specific activities, Class A or B hoardings will be erected along the construction site boundary to protect the works site and the general public. These hoardings will be erected to define the extent of the works site. All access points are to be securely locked when construction activities are not in progress.	30/06/2020 Observation: <ul style="list-style-type: none"><li>- Appropriate hoarding was observed along the construction site boundary and appeared to be in good condition.</li><li>- All access points were observed to have the capacity to be locked.</li></ul>				

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Z225	CEMP	Section 5.14 of Appendix C	Traffic	Adjacent developmen ts	When the programs of both developments are finalised, the Principle Contractor will liaise with the adjacent development, to co-ordinate the traffic management to minimise the cumulative traffic and parking impacts of both developments.	26/06/2020 Record sighted: - RCC provided email statement that there have been no recent liaison as the project on Victoria Avenue has ceased work since March.				
Z226	CEMP	Section 5.15 of Appendix C	Traffic	Staff induction	All staff and subcontractors engaged on site will be required to undergo a site induction. The induction will include permitted access routes to and from the construction site for all vehicles, as well as standard environmental, OH&S, driver protocols and emergency procedures. Additionally, the Principle Contractor will discuss TMP requirements and advise workers of public transport and car-pooling opportunities.	26/06/2020 Record Sighted: - Site induction information which includes traffic access, TMP, site behaviour, public transport, car pooling opportunities, CEMP requirements, and tree protection zones among other items.  30/06/2020: Record sighted: - Induction records for June 2020 sighted through Blueglue an online service that maintains the induction register and sign in sign out records.				
Z227	CEMP	Section 5.17 of Appendix C	Traffic	Occupationa l health and safety	Any workers required to undertake works or traffic control within the public domain shall be suitably trained and will be covered by adequate and appropriate insurances. All traffic control personnel will be required to hold RMS accreditation in accordance with Section 8 of Traffic Control at Worksites.	Record sighted 26/062020: - Traffic Controller and Implement Traffic Control Plans RMS ID/certification.				
Z228	CEMP	Section 5.18 of Appendix C	Traffic	Method for communicat ing traffic changes	Traffic control plans in accordance with Australian Standards (AS 1742.3 – Traffic Control Devices for Works on Roads) and RMS Traffic Control at Worksites manual will advise motorist of upcoming changes in the road network. During construction the contractor shall, prior to work commencing, ensure all signage is erected in accordance with the TCP and clearly visible. Each evening, upon completion of work, the contractor is to ensure signage is either covered or removed as required. Sign size is to be size "A". No deviation from the approved TCP shall be permitted, unless otherwise approved by the Department and certified by an RMS accredited personnel. The associated TCP road signage will inform drivers of works activities in the area including truck movements in operation. Prior to commencement of works on site the contractor is to inform neighbouring properties of proposed works and provide site contact information by means of a letter box distribution.	30/06/2020 Observation: - Traffic / parking changes sign by Woollahra Municipal Council posted along the boundary of the site. - Traffic signage on the public roads adjacent to the site and traffic controllers located in accordance with the TMP.				
Z229	CEMP	Section 5.20 of Appendix C	Traffic	Maintenanc e of roads and footways	The roads and footpaths along the route of travel will be kept in a serviceable state at all times. A dilapidation study will be prepared and submitted to the Council and any damage arising as a result of the proposed truck movements will be treated / repaired by the principal contractor at no cost to Council or the School.	30/06/2020 Observation: - Some damage to the Rose Bay Avenue was observed on the opposite side of the road to the construction site access.  7/7/2020 Record sighted: - Dilapidation report from SCP engineers and development consultants dated 30/10/2020 with photographs of the roads in the area showing that this particular portion of the road was in an area of construction by others. - Email correspondence from RCC stating that the works on the property where the damage was observed is ongoing by others. - RCC cannot confirm the issue with soil to the verge, however, RCC has rectified the issue with photographs provided as evidence.				
Soil and Water Management Plan										

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Z230	CEMP	Section 2.1 of Appendix F	Soil & Water	Soil and water managemen t implementation	a. Input drainage and storm management systems to transport stormwater and run-off through or around site safely and without contamination of waterways. b. Any temporary sediment basins must be constructed and in service prior to the start of bulk excavation and earthworks, where disturbed earthworks area exceeds 2,500 m2 at any one time. The basement excavation will form a suitable temporary sediment basin for the anticipated disturbed area. This basin is to remain until the disturbed area has had slab construction commence or stabilised. c. Install sediment fencing and cut drains to meet the requirements of the erosion sediment management drawings prepared by SCP. d. Waste collection bins shall be installed adjacent to site office – yet not in a position which, in the case of overflowing or a spill, compromises the safety of waterways – for collection of all construction refuse. All waste materials must be disposed of off-site in a safe and legal manner, or stored safely, well clear of streambanks and flood-prone areas. e. Staff facilities to be located such that all effluent and waste water is easily contained and managed within the site management area. f. Construct stabilised site access in the location nominated on the erosion sediment management drawings prepared by SCP. g. Install sediment control protection measures such as geotextile filters or sandbags, at all natural and man-made drainage structures. Maintain until all the disturbed areas are stabilised. h. Clear and strip the work areas. Minimise the damage to the grass and low ground cover of nondisturbed areas. At all times, minimise the area of the site being disturbed and stockpile all topsoil for reuse in rehabilitation works. i. Ensure that land disturbance is no further than 5 metres from the edge of construction activities, where possible. j. Vehicle and equipment maintenance to occur offsite, or, where appropriate, in a designated area onsite that is impervious and bunded or similarly confined to prevent contamination of waterways. k. Do not use invasive species in rehabilitation. l. Do not use herbicides or other chemicals where they might pollute waterways. m. Works should not cause new seepage areas. n. Protect all stockpiles of materials from scour and erosion. o. Apply permanent stabilisation to site (landscaping) within 20 days of	30/06/2020 Observation: - Stormwater that falls on the site would be captured within the site given that current site topography falls toward the deep excavation. - Sausage bunds were observed on kerbside drains on surrounding public roadways. kerbside drains were observed to be free of sediment loads. - Sediment fencing was observed in appropriate locations across the site. - Segregated waste and designated waste storage areas were noted. - Staff facilities were located within an area that should it be necessary all effluent and waste water could be easily contained and managed within the site management area. - A stabilised site access was observed at the delivery entrance with a cattle grid / wheel wash down bay. - Sausage bunds (sandbags) as above. Geotextile fabric was observed placed on areas where no work was occurring to stabilise underlying soils. - Work areas were cleared and stripped while non-work areas were relatively untouched. - Some vehicle and equipment maintenance occurs onsite within a designated area. Information by RCC indicates that this area is lined with geotextile liner.  2/6/2020 Record sighted: - Site plan detailing a vehicle maintenance area and site photos demonstrating that the area is underlain by geotextile material and roadbase. The area is located within a bunded area.				

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Z231	CEMP	Section 2.2 of Appendix F	Soil & Water	Erosion and sediment control	a. Clearly visible barrier fencing shall be installed on the site to assist in controlling the movement of traffic within the site and prohibit unnecessary site disturbance. b. Vehicular access to the site shall be stabilised and limited to only that essential for construction work and shall enter the site only through the designated stabilised access points. c. Proprietary silt fencing shall be installed in accordance with the erosion and sediment management drawings prepared by SCP and elsewhere at the discretion of the site superintendent to contain coarser sediment fractions as near as possible to their source. d. Stockpiles shall be located in accordance with the erosion and sediment management drawings prepared by SCP. Where stockpiles are to be in place longer than 10 days they shall be stabilised by covering with mattering or tarps. Use sediment fences and earth banks with stockpiles as required to manage erosion. e. Stockpile material may be removed from site to reduce the risk of further pollution of site runoff. f. Soil materials shall be replaced in the same layers they are removed from the ground i.e. all subsoils are to be buried and topsoil is to be respread on the surface at the completion of works. g. All disturbed areas are to be stabilised within 20 working days of the completion of site works. All disturbed areas are to be protected so that the land is permanently stabilised within three months. Topsoil shall be respread over the site as required to achieve a minimum depth of 75mm of hydromulchable soil (exact required depth to be confirmed by supplier). The site shall be stabilised and revegetated using a hydromulch mix (or equivalent) to be specified by the supplier, as appropriate for the site. Soil testing may be required to tailor the mix for the site. If hydromulching is not suitable for site stabilisation, the below seed mix can be used for temporary stabilisation, assuming topsoil depths are sufficient. Any areas that remain exposed after disturbance, where no further works are to take place for a period of 12 weeks must be stabilised by the methods mentioned in this point (g) or an equivalent. h. All vehicles shall leave the site via the stabilised site access onto Belmont Street. Vehicles shall have sediment removed from tyres and wheel guards prior	30/06/2020 Observation: - See relevant items above for sediment controls in Z230 above. - Clearly visible barrier fencing was observed to control the movement of traffic on the site. - Stockpiles at the time of the Audit inspection were not covered as they were being worked on.				
Z232	CEMP	Section 2.3 of Appendix F	Soil & Water	Groundwater protection	All groundwater management items raised within the above reports need to be adopted within other construction management plans and followed during construction.	Covered under Initial Audit: - The Douglas Partners (March 2018) PSI (Contamination), Cranbrook School Redevelopment does not require groundwater management, unless there is any unexpected find. Item considered non-triggered.				
Z233	CEMP	Section 3 of Appendix F	Soil & Water	Maintenance during construction	A regular site maintenance program shall be established for the site based upon: • Daily site walk-over by site foreman/manager to ensure adequate condition of erosion control measures; • A weekly site audit of erosion control measures during periods of dry weather; and • A site audit of all erosion control measures following a rainfall event.	26/06/2020 Record Sighted: - Environmental inspections for 19 & 26 February and 19 & 26 March 2020. - Daily perimeter inspection checklists provided for 26-29 May 2020.  2/7/2020 Record sighted: - Audit of erosion and sediment controls and environmental management after a rain event dated 13/02/2020. - Audit of erosion and sediment controls and environmental management after a rain event dated 14/05/2020.				

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Z234	CEMP	Section 4 of Appendix F	Soil & Water	Unexpected finds protocol	If during excavation and construction, any potentially hazardous materials are found within the site, all work on the site should be halted immediately. A relevant expert (geotechnical engineer, environmental consultant, civil engineer, asbestos consultant) should be contacted. Work should remain halted until the relevant expert can assure that all hazard to workers has been removed/neutralised, and that there will be no negative long-term effects to future residents or their assets due to the hazard.  A similar protocol is to be undertaken if any unexpected or unmapped services are encountered during excavation and construction, such as heritage or Aboriginal artefacts. Construction should be halted until the relevant service provider can be contacted, and the service properly located and mapped. An engineer should be consulted if this effects construction works or excavation significantly.	26/06/2020 Record sighted:  - RCC email statement that there have been no unidentified finds during the Audit Period. Item considered non-triggered.				
Flood Emergency Response Plan										
Z235	CEMP	Section 3 of Appendix F	Flood	Flood warning	- If Bellevue Hill is forecast as having a storm or heavy rainfall in excess of 50mm during any day the site is operational this shall be communicated to all workers within the pre-start meeting and the site manager and supervisors tasked with regularly checking their preferred communication channel for updates on when the rainfall event may occur.  - During periods of intense rainfall and if flood depths are noticeable on the Hordern Oval all plant should be relocated to an area above the flood extent. All work shall cease within the flooded area and employees and contractors shall take shelter within the site amenities.  Works should not recommence within any flooded area until the excavation has been adequately pumped out and the flooding on the Oval has subsided.	8/7/2020 Record sighted:  - RCC state in email correspondence that there has been no flood to date in the area.				
Z236	CEMP	Section 5 of Appendix F	Flood	Flood awareness training	Flood awareness training shall be provided as part of site-specific induction for all employees and contractors as part of the induction process.  Pre-start meetings and Toolbox Talks focussed on the risks associated with working in flood prone areas - including the rapid rising flood waters and entering flood waters should be completed on a 3 monthly basis to ensure all workers remain clear on the associated flood risk present at the site.	Covered under Initial Audit assessed as compliant:  - 5/2/2020: Flood awareness is provided in Richard Crookes induction.				
Waste Classification and Validation										
Z237	CEMP	Sections 7 & 8 of Appendix J	Waste	Waste classificatio n assessment & ENM Assessment	All samples of fill would be classified as General Solid Waste (non-putrescible) and would need to be disposed of at a site that is licenced to receive this category of waste. Any materials encountered on the site that are different to those described herein may have a different classification.  The natural soils and, where encountered, rock below the fill should be able to be described as virgin excavated natural material (VENM) upon excavation, providing they are not cross-contaminated during excavation/piling works. Validation of this status will be required once the overburden has been removed from the site. VENM can usually be transported to a site for use as fill rather than requiring disposal at landfill.  The materials outside the areas of yellow shading can be described as Excavated Natural Material (ENM) upon excavation and can be disposed of at a site that is licenced to receive this type of material.	Covered under Item Z108 (SSD Condition D29) and assessed as compliant.				

