Independent Environmental Audit

Loreto Normanhurst Secondary School Redevelopment Stage 1 sub-stage 4

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Executive Summary

Carmichael Tompkins Property Group (CTPG), on behalf of Loreto Normanhurst (the Applicant), engaged Onterris Australia Pty Ltd (Onterris) to undertake an Independent Environmental Audit (IEA) for the Stage 1, sub-stage 4 at the Loreto Normanhurst School (the site). This document outlines the method, findings, and recommended actions for the first audit post commencement of construction for Stage 1, sub-stage 4. The IEA scope included activities undertaken between 28 February 2026 and 17 July 2026.

As per conditions D37 and D38 of the State Significant Development (SSD) 8996-MOD-2 Development Consent (the Development Consent, SSD 8996-MOD-2), an IEA is required to be conducted in accordance with the Department of Planning and Environment's Independent Audit Post Approval Requirements (2026).

The criteria of this IEA was based on the following:

- Conditions of SSD 8996-MOD-2: Schedule 3, Parts A – F
- Community Consultation Plan (CCP)
- Construction Environmental Management Plan (CEMP)
- Construction Pedestrian and Traffic Management Plan (CPTMP)
- Construction Noise and Vibration Management Plan (CNVMP)
- Construction Soil and Water Management Plan (CSWMP)
- Construction Waste Management Sub-plan (CWMP)

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

IEA FINDINGS

The Applicant was found to be **95%** compliant with the conditions of SSD 8996-MOD-2. At the time of the site inspection, minor defects works associated with the boarding house interior and landscaping were being undertaken for sub-stage 4.

The Contractor had demobilised offsite and the site appeared to have been left in a neat and tidy manner:

- All waste had been removed offsite
- Landscaping was complete with only minor defects works occurring
- No evidence of sediment having been tracked offsite

KEY NON-COMPLIANCES

Key NCs identified during the audit were considered administrative in nature relating to reporting requirements.

Compliance reporting

The annual Operation Compliance Report for sub-stages 1 - 3 (2025) was not completed and submitted to the Department as required by Condition A38 – A40. This was also identified as a NC in the previous IEA.

The proponent submitted a request for the cessation of the ongoing operations compliance audits and reporting for sub-stages 1 – 3, which the Department approved in March 2026, however the approval did not include detail to state that the outstanding 2025 report was no longer required.

Audit Reporting

Section 4.3.2 of the IA PAR specifically requires the proponent to submit their response to the audit recommendations to the Department in a document separate to the final IEA report.

Although a copy of the previous IEA Report had been published on the project website, a copy of the response to the recommendations had not been provided in a separate document and published.

Occupation Certificate

Condition E3 requires the Applicant to provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after it is accepted by the Certifier.

Although the documentation was submitted to the Planning Secretary, it was outside of the seven day timeframe (Occupation certificate date being 15 July 2026).

IEA ACTION PLAN

Based on the IEA findings an action plan has been prepared to address non-compliances or to improve overall environmental management. A summary of the actions recommended to address non-compliances include:

- Seek clarification from the Department whether the approval for the cessation of future compliance reporting for sub-stages 1-3 includes the outstanding report for 2025
- Complete and submit the outstanding 2025 Operation Compliance Report in accordance with the Compliance Reporting Post Approval Requirements (2020) if required
- For future substages, ensure all documentation given to the Certifier is provided to the Planning Secretary within seven days after it is accepted by the Certifier it

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

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1 Introduction

Onterris Australia Pty Ltd (Onterris) was engaged by Carmichael Tompkins Property Group (CTPG) on behalf of Loreto Normanhurst (the Applicant) to undertake an Independent Environmental Audit (IEA) for the Stage 1, sub-stage 4 (the project) covering construction works associated with the Loreto Normanhurst School re-development (the site). The IEA was undertaken in response to conditions D37 and D38 of the State Significant Development (SSD) 8996-MOD-2 Development Consent (the Development Consent, SSD 8996-MOD-2). The IEA was undertaken between 3 July 2026 and 17 July 2026. This document outlines the method, findings, and recommended actions of the IEA.

1.1 Background

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

Refer to **Figure 1** for overarching Construction Stages and **Figure 2** for a site plan identifying the current status of each substage.

In summary. Stage 1 of the re-development is comprised of (as per SSD 8996-MOD-2):

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

Figure 1. Construction Stages

Status of Construction Works – Stage 1

Summary of Substage Construction:

Substage No. 1 – Reconfigure Osborn Rd Carpark - COMPLETED

Substage No. 2 – Through Site Link - COMPLETED

Substage No. 3 – P1A tennis court carpark - COMPLETED

Substage No. 4 – New Boarding House

- Demolish Loreto Community House - **COMPLETED**
- Construct boarding accommodation building – **WORKS UNDERWAY (COMMENCED JULY 2024)**
- Reconfigure P4 primary carpark - **NOT COMMENCED**

Substage No. 5 – P4A Multi-purpose Carpark

- Demolish 3 multi-purpose courts/structures - **NOT COMMENCED**
- Construct P4A Multi-purpose carpark including three new multi-purpose courts - **NOT COMMENCED**
- Demolition and landscaping works - **NOT COMMENCED**

Figure 2. Current Site Works Plan

1.2 IEA Particulars

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

Table 1. IEA Particulars

Particular	Details
Applicant	Loreto Normanhurst
Applicant Representative	Carmichael Tompkins Property Group
Principal Contractor (sub-stages 1 – 3 complete)	Cowyn Building Group
Principal Contractor (sub-stage 4)	Buildcorp
Principal Contractor (sub-stages 5 – 6)	Yet to be engaged
Construction Commencement (sub-stage 4)	July 2024
IEA Period*	27 February 2026 to 17 July 2026
IEA site inspection	17 July 2026

*Any activity or evidence that was not within this IEA period was not included in the scope of the audit

1.3 IEA Team

The IEA team are listed in **Table 2**. In accordance with Condition D37 of SSD 8996-MOD-2, approval for the appointment of an independent audit team for the IEA was granted by the Department of Planning, Housing and Infrastructure (DPHI) on 19 February 2025 (**Appendix A**). Further, DPHI advised that the audit team has previously been approved and will not require new approval until a change in construction phases (i.e. commencement of substages 5/6). The auditors confirm their independence, and the signed Independent Environmental Audit Declaration Forms have been provided (**Appendix B**).

Table 2. IEA Team

Person	Role	Years' Experience	Qualification
Chris Griffiths	Lead Auditor	20	Lead Auditor (Exemplar Global, No/ C-449888), BSCi (Environmental Management)
Kirsty Douglas	Audit Support and Technical Reviewer	20	Lead Auditor (Exemplar Global, No. 210439), BEnvSci (Conservation Biology and Ecology), GCert IAP2 Australasia
Gabrielle Head	Audit Support	3	BSci (Environmental Biology); BSCi (Science in Information Technology), B.Creative Intelligence and Innovation

1.4 IEA Objective

The key objectives of the IEA are to:

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

1.5 IEA Scope

The IEA scope included activities undertaken at the site, in relation to the Stage 1, sub-stage 4 construction works for the re-development of the Loreto Normanhurst School, Normanhurst NSW with respect to Parts A to F of Schedule 3 of SSD 8996-MOD-2 the Construction Environmental Management Plan (CEMP) and relevant environmental sub-plans.

2 IEA Method

2.1 IEA Method Development

The IEA method was developed with reference to:

- Independent Audit Post Approval Requirements (NSW Government, 2026)
- ISO 19011: 2019 Guidelines for Auditing Management Systems

2.2 IEA Program

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

Table 3. IEA Program

Proposed Date	Task / Description	Location	Responsibility
Phase I Project Preparations			
3/07/26	Preparation and provision of IEA Plan to CTPG	Email	Onterris
8/07/26	Provision of management plans required for the IEA	Email	CTPG
8/07/26 - 13/07/26	Undertake a preliminary document review	Onterris Offices	Onterris
3/07/26 – 13/07/26	Develop the IEA tools	Onterris Offices	Onterris
Phase II - IEA			
14/074/26	Opening Meeting	Site	Onterris & CTPG
17/07/26	Site inspection	Site	Onterris
17/07/26	IEA Interviews	Site	Onterris & CTPG
17/07/26 – 31/07/26	IEA Interviews and evidence collation (additional time allocated if required)	Teleconference	Onterris & CTPG
21/08/26	Closing Meeting	Site	Onterris & CTPG
Phase III – IEA Reporting			
14/08/26	Provision of additional evidence not obtained during the IEA	Email	CTPG
4/08/26 – 28/08/26	Prepare the draft IEA report	Onterris Offices	Onterris
2/09/26	Issue the draft IEA report to CTPG	Email	Onterris
7/9/26	CTPG provides comments on draft IEA report	Email	CTPG
10/9/26	Issue the final IEA report to CTPG for submission to the DPHI	Email	Onterris

2.3 IEA Tools

The following tools were used during the IEA. The tools included:

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

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

2.4 IEA Criteria

The criteria of this IEA were based on the following:

- Conditions of SSD 8996-MOD-2: Schedule 3 Parts A – F
- Community Consultation Plan (CCP)
- Construction Environmental Management Plan (CEMP) and subplans:
    - Construction Pedestrian and Traffic Management Plan (CPTMP)
    - Construction Noise and Vibration Management Plan (CNVMP)
    - Construction Soil and Water Management Plan (CSWMP)
    - Construction Waste Management Sub-plan (CWMP)

2.5 IEA Compliance Rating

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

Table 4. IEA Scoring Criteria

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

2.6 Pre-audit Consultation

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

2.7 Department, Other Interested Parties' Consultation

DPHI, Hornsby Shire Council and the Loreto Normanhurst Community Consultative Committee (CCC) were provided an opportunity to provide input into the scope of the audit.

A summary of the items raised by DPHI and how these have been addressed in this IEA are outlined in **Table 5**. Refer to **Appendix H** to for consultation records received.

2.7.1 Department of Planning, Housing and Infrastructure

DPHI issued a letter (dated 3 August 2026) stated that the previous IEA (27/08/2025 - 27/02/2026) was considered to generally satisfy the reporting requirements of the Consent and the IA PAR. The letter also requested the following items for future IEAs:

- Site inspection to be conducted during the audit period in accordance with the IA PAR
- The IEA report and RAR be published on the project website
- A status update for all actions in the RAR be reported in the next IEA until all actions complete
- Following submission of the IEA report a review (and update if necessary) of strategies, plans, programs required under this consent be completed

2.7.2 Community Consultative Committee

Two responses were received by members of the CCC outlining residents' concerns with the development which focussed on:

- Light pollution from the carpark and boarding house
- Parking arrangements
  - Carpark marshalling
- Carpark and Substation screening

2.7.3 Hornsby Shire Council

There was no response received by Hornsby Shire Council.

Table 5. Audit Consultation Summary

Agency / Interested Party	Consultation Response Summary	Responses/Findings
DPHI	**Future Audit Requirements** • Site inspection to be conducted during the audit period in accordance with the IA PAR • The IEA report and RAR be published on the project website • A status update for all actions in the RAR be reported in the next IEA until all actions complete • Following submission of the IEA report a review (and update if necessary) of strategies, plans, programs required under this consent be completed	A review of documentation provided confirmed: • The site inspection for this IEA was undertaken generally in accordance with the IA PAR • A copy of the previous IEA report was confirmed as being published on the project website, however section 4.3.2 of the IA PAR specifically requires the proponent to submit their response to the audit recommendations (RAR) to the DPHI in a document separate to the final IEA report. A copy of the RAR had not been published • This IEA includes a review of the status of the recommendations made in the previous IEA report • Document review/updates did not occur as required by condition A36, however it was noted that construction was complete and only minor defects work was being undertaken at the time of the audit
Member of the Loreto CCC	**Light Pollution** Parking area: • Strong lights on high poles of which there are a large number are kept on all night – sometimes all the lights and sometimes every second light. Boarding house: • Lights on every night. While we were led to believe there would be adequate screening of both the boarding house and the parking area, this has not eventuated. The extremely bright lighting of the boarding house and especially the parking area impinges on the neighbouring properties. The extent of the unscreened parking lot with high light towers is an eyesore.	The Design certificate confirmed that lighting design was in accordance with relevant standards BASSIX and BCA requirements as well as complying with relevant approval conditions. The Applicant has been advised of concerns related to the parking area and the boarding house lighting.
	Parking Arrangements Refence made to the "Operational Transport and Access Management Plan – specifically:	These concerns are noted; however they relate to school activity operations and are not associated with the construction works for sub-stage 4. These issues should be

Agency / Interested Party	Consultation Response Summary	Responses/Findings
	"(j) car parking arrangements and management associated with attendance at the school by staff, parents and persons associated with the school to ensure no parking occurs on Osborn Road and Mount Pleasant Avenue; (k) monitoring of Mount Pleasant Avenue and Osborn Road by traffic marshals and/or staff to ensure pick-up/drop-off does not occur on these roads". Despite requesting staff to park on site, the school does not seem to have met these requirements by monitoring the situation. Staff and students still park in the surrounding streets and parents use these streets to pick up and deliver students rather than use the link road through the school. Parking arrangements are a major requirement to protect amenity for the local residents	raised directly with the Applicant (Loreto Normanhurst School). The Applicant has been advised of the parking arrangement and traffic monitoring concerns.
Member of the Loreto CCC	**Substation Screening** Specific reference made to SSD8996 conditions: B4(d), B5(a) and E30: Residents of Mount Pleasant Avenue consider that the substation is not adequately screened from the public domain. Reference made to commitments /comments made in the CCC meetings: • 20/02/2024 – CTPG representative confirmed landscaping had been proposed outside of the audit period	**Condition B4(d) and B5(a):** These conditions specifically require landscape plans (including detail required) be submitted to the satisfaction of the Planning Secretary prior to the issue of the construction certificate for Stage 1. The landscape plans were provided to and approved by the Planning Secretary during previous audit periods. The Applicant has been made aware of the concerns with regard to the substation screening.
	Carpark Screening - Mount Pleasant Ave Specific reference made to SSD8996 conditions: B5(f), E30 and F18:	**Condition E30** stipulates that landscaping is completed in accordance with the approved landscape plans. The installation certificate provided by O Landscapes included a statement certifying that the landscaping areas had been installed / implemented / constructed in accordance with the BCA clause and Australian Standards.

Agency / Interested Party	Consultation Response Summary	Responses/Findings
		The Applicant has been made aware of the concerns with regard to carpark screening. **Condition F18** identifies operational management plans that must be implement and adhered to at all times by the Applicant following the issue of the relevant occupation certificate. These concerns are noted; however they relate to school activity operations and are not associated with the construction works for sub-stage 4. These issues should be raised directly with the Applicant (school).
	Ongoing Traffic Marshalling Obligations Specific reference made to SSD8996 conditions: E11(j), E11(k) and F13 in relation to school related parking, traffic monitoring and implementation of the Operational Traffic and Access Management Plan. Community concerns identified – resident observations of ongoing instances of parking and pick-up/drop-off activity on both Osborn Road and Mount Pleasant Ave during school peak periods.	**Condition E11** relates to specific items required to be addressed in the Operational Transport and Access Management Plan. These concerns are noted; however they relate to school activity operations and are not associated with the construction works for sub-stage 4. These issues should be raised directly with the school. The Applicant has been advised of the parking arrangement and traffic monitoring concerns. **Condition F13** Part F of SSD8896 relate to post occupation. The boarding house was not occupied at the time of the audit. The implementation, monitoring, review and update to the Operational Transport and Access Management Plan will be required to be managed by the School once occupation commences. Compliance with the requirement of this condition will occur in future audits. The Applicant has been advised of the requirement to implement the Operational Transport and Access Management Plan as per Condition F13.
	Pre - OC Compliance – Summary Request	The request is noted; however it is not the role of the Auditor to advise the Certifier of how to assess compliance.

Agency / Interested Party	Consultation Response Summary	Responses/Findings
	Given the boarding house occupation certificate has not yet issued, conditions E30 and E31 remain live pre-OC obligations. A specific request was made to "*…respectfully as the auditor to confirm that the certifier has been put on notice of the landscaping concerns…and that full compliance with E30 and E31 will be required as a condition of the boarding house OC being issued".*	Note: Occupation Certificates are provided to the Planning Secretary.
Other agencies	None received	NA

2.8 Site Inspection

A site inspection was undertaken by Lead Auditor, Chris Griffiths, on 14 July 2026 to visually verify compliance with the IEA criteria. Weather on the day of the site inspection was partly cloudy, with a low of 9°C and high of 20°C (BoM 2026). There had been not rainfall recorded prior to the site inspection, with ~38 mm of rainfall recorded within the seven days prior (BoM 2026). The Lead Auditor was escorted by a CTPG and Buildcorp representative during the site inspection. The Lead Auditor was provided unrestricted access to the site to verify compliance.

2.9 IEA Interviews

Construction works were complete at the time of the audit, with the construction contractor (BuildCorp) having demobilised off site. During the IEA, CTPG acted as representative for the Applicant, and the CTPG Project Manager, Brigid White was interviewed and provided available evidence verifying compliance of the Applicant's responsibilities under SSD 8996-MOD-2. Interviews were held both on site, via teleconference and via email correspondence.

2.10 IEA Evidence

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

- Loreto Normanhurst Redevelopment Master Plan website
- Re-development staging report
- Approved drawings and plans
- Landscape drawings
- The CEMP, including sub-plans
- Community consultation strategy
- Transport strategy
- Waste reports
- Complaints and incidents records
- Construction contractor requirements
- Site inductions
- Weekly inspection forms and reports
- Toolbox Talk records
- Pre-start checklists
- Training records
- Certificates associated with services
- Occupation Certificate

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

3 IEA Findings

3.1 Overall IEA Results

Overall, the Applicant demonstrated compliance against **95%** of the IEA criteria. A total of 200 individual conditions of SSD 8996-MOD-2 were audited across the IEA criteria with 80 of those conditions classified as not triggered (NT) for the audit period. Four non-compliances (NCs) across six conditions and two OFIs against five conditions were identified.

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

3.2 Positive Observations

The Contractor had demobilised offsite and the site appeared to have been left in a neat and tidy manner:

- All waste had been removed offsite
- Landscaping was complete, included grassed areas and gardens that were well presented with only minor defects works occurring
- No evidence of sediment having been tracked onto the external road network
- Buildcorp representative was made available for site inspections despite being demobilised from site

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

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

3.4 Status of previous IEA Findings (March 2026)

The March 2026 IEA identified seven NCs across 16 conditions and one OFI during the relevant audit period. It is also noted that the March 2026 audit identified that there were two NC actions that had not been closed out from the August 2025 audit.

Construction works were complete at the time of the audit, with the building contractor (Buildcorp) having demobilised offsite (by 30 June 2026). The only active works on site at the time of the audit were minor defects works associated with internal building outfitting and landscaping works. This IEA identified that two actions remained outstanding at time of this IEA.

The status of each of the March 2026 IEA recommended actions and the two outstanding actions from the August 2025 audit by the Applicant are provided in **Table 6.**

Table 6. March 2026 IEA Action and Recommendations Status

Reference	Condition(s)	Recommended Actions (March 2026 IEA)	Findings (July 2026 IEA)	Status
March 2026 Audit				
NC02-NC07	A16 D9	Refer to the following Unique NC ID numbers NC-02 to NC-07 for specific actions:	Refer to findings for NC-02 to NC-07.	Closed
NC-01	A38 A39	Complete the Operation Compliance Report for substages 1 - 3 and submit to the Department as a priority. The outcome of the requirement to provide Ongoing Compliance Reports is pending further correspondence from DPHI. If DPHI determine that compliance reporting is to continue – Complete the Compliance Report for the previous 52 week period and submit to the Department as a priority.	The Planning Secretary approved the cessation of ongoing Operation Compliance Reports for substages 1-3, however it did not explicitly exempt the submission of the 2025 Operation Compliance Report. Therefore this is considered outstanding.	Open
NC-02	D4 D13 D14	Responsible contractor identified and subsequent notice issued advising of approved project hours.	Evidence was provided outside of the March 2026 audit period but prior to the submission of the audit report, therefore this action was identified closed in the March audit report.	Closed
NC-03	D16 D17	A vibration related complaint was recorded 17/12/2025 as a result of a vibration roller being operated in the car park area directly opposite residential buildings on Mt Pleasant Ave. Vibration assessment undertaken. No further vibration activities required If further vibration intensive activities are required ensure they are within the acceptable vibration values. Undertake a vibration impact assessment prior to works and conduct monitoring where required.	Evidence was provided outside of the March 2026 audit period but prior to the submission of the audit report, therefore this action was identified closed in the March audit report.	Closed
NC-04	D21 D22	Site inspection reports now include identifying weather that could result in dusty conditions and when to implement relevant dust control measures. The updated inspection report was developed by Buildcorp (21/04/2026)	Evidence was provided outside of the March 2026 audit period but prior to the submission of the audit report, therefore this action was identified closed in the March audit report.	Closed
NC-05	D23	Site inspection reports now include identifying weather that could result in dusty conditions and when to implement relevant dust control measures. The updated inspection report was developed by Buildcorp (21/04/2026)		
NC-06	D29	Undertake a site inspection to verify all waste is contained in appropriate secure bins. Where loose waste is identified, transfer this waste to the correct bin(s).	Construction works were completed at the time of the audit, with all construction waste bins having been removed offsite.	Closed

Reference	Condition(s)	Recommended Actions (March 2026 IEA)	Findings (July 2026 IEA)	Status
		Issue a reminder (ie. Through a Toolbox or similar) to all site personnel regarding waste management on site.	Observations on site during the site inspection did not identify any construction /landscaping waste migrating offsite. Implementation of the recommended action is not required and is considered closed. **Note:** The requirement for waste management will be required for future substages and compliance will be assessed in future audits.	
NC-07	D40 D41	DPHI requested the proponent must submit their response to the audit findings to the Department in a separate document.	The status of the audit actions, findings and the status were included in Table 6 of the March 2026 audit.	Closed
OFI-01	C14	Update the ESCP to reflect current site conditions including the removal of the sediment pond.	Construction works were completed at the time of the audit, with all ESC measures for construction having been removed. Implementation of the recommended action is not required and is considered closed. **Note:** The requirement for the implementation of ESC mitigation measures and monitoring will be required for future substages and compliance will be assessed in future audits.	Closed
August 2025 Audit				
NC-01	A16 D9 D23	• Remove damaged sediment fence on the western boundary of the site and reinstate as per installation requirements of the CSWMP • Continue regular site inspections and note condition of ESC and if maintenance or replacement is required • Site inspections to be undertaken in accordance with Table 4 of the CSWMP focusing ESC inspections prior to, during, and up to 24 hours following rainfall events and are to be recorded	**March 2026 Audit findings:** It could not be determined if site inspections were undertaken prior to, during and up to 24 hours following rainfall events. **July 2026 Audit findings:** Construction works were completed at the time of the audit, with all ESC measures for construction having been removed. The action is no longer considered necessary and is therefore considered closed. **Note:** The requirement for the implementation of ESC mitigation measures and monitoring will be required for future substages and compliance will be assessed in future audits.	Closed
NC-02	A38	**Option 1:** Complete a Compliance Report for the 52 week period following the March 2024 Report and submit to the Planning Secretary. **Option 2:** Submit a request to the Planning Secretary requesting an exemption from ongoing Operation Compliance Reports.	**March 2026 Audit findings:** The exemption for the cessation of future Operation Compliance Reports for substages 1 - 3 had not been granted at the time of the audit. Therefore, the 2025 Operation Compliance Report remains outstanding. **July 2026 Audit findings:** The Planning Secretary approved the cessation of ongoing Operation Compliance Reports for substages 1-3, however it did	Open

Reference	Condition(s)	Recommended Actions (March 2026 IEA)	Findings (July 2026 IEA)	Status
		Note: It was reported that a letter to the Planning Secretary requesting exemption from ongoing OCR was uploaded to the Planning Portal on 23/10/2025.	not explicitly exempt the submission of the 2025 Operation Compliance Report. Therefore this is considered outstanding. **Note:** this has been identified as a NC in this current audit period.	

[1] Non-conformances resulting in the same recommended action have been grouped

3.5 Development Consent

The Applicant was found to be **95%** compliant with the conditions of the SSD 8996-MOD-2.

At the time of the site inspection, fit out works associated with the boarding house interior and landscaping was being undertaken for sub-stage 4 and were near completion.

Four NCs against six conditions and two OFIs against five conditions were identified during the IEA, which have been detailed in **Table 7.**

Recommended actions to address the identified NCs and OFIs and identified opportunities are detailed in **Section 4**. A complete action plan to address these findings have been provided in **Table 10**.

Table 7. IEA Findings – Development Consent SSSD 8996

Condition	Requirement	Assessment	IEA Finding (Summary)
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; (b) any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and (c) the implementation of any actions or measures contained in any such document referred to in (a) above.	NC	The letter dated 3 August 2026 stated that the previous IEA (27/08/2025 - 27/02/2026) was considered to generally satisfy the reporting requirements of the Consent and the IA PAR. The letter also requested the following items for future IEAs: 1. Site inspection to be conducted during the audit period in accordance with the IA PAR . The site inspection for this IEA was undertaken in accordance with the IA PAR 2. The IEA report and RAR be published on the project website. A copy of the report was confirmed as being published on the project website, however section 4.3.2 of the IA PAR specifically requires the proponent to submit their response to the audit recommendations to the Department in a document separate to the final IEA report. **Evidence was not provided demonstrating that a separate document responding to the audit actions/recommendations was completed / submitted to the Department.** 3. A status update for all actions in the RAR be reported in the next IEA until all actions complete. This IEA includes a review of the status of the recommendations made in the previous IEA report. 4. Following submission of the IEA report a review (and update if necessary) of strategies, plans, programs required under this consent be completed. Document review /updates did not occur, however it is important to note that at the time of this audit, construction was complete and only minor defects work was being undertaken.
A36	Within three months of: (a) the submission of a compliance report under Schedule 3 condition A38; (b) the submission of an incident report under Schedule 3 condition A32; (c) the submission of an Independent Audit under Schedule 3 condition D37; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under Schedule 3 condition A2 which requires a review the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	NC	Recommendations made in the previous IEA related to the review and /or update of documents/management plans etc, did not occur, however, construction was complete and only minor defects work was being undertaken at the time of this audit

Condition	Requirement	Assessment	IEA Finding (Summary)
A38	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).	NC	The annual Operation Compliance Report for substages 1 - 3 (2025) remains outstanding. A letter from the Department in March 2026 approved the cessation of ongoing annual Operational Compliance Reporting for sub-stages 1 to 3. This approval did not include any detail to state that the outstanding 2025 report was no longer required. Therefore, compliance with this condition for substages 1 - 3 has not been met and the 2025 report remains outstanding. It is noted that the approval to cease compliance reporting does not include sub-stage 4 (subject to this audit) and annual compliance reports for substage 4 will still be required in accordance with the Compliance Reporting Post Approval Requirements (2026).
A39	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.	NC	Previous Operations Compliance Report dated 7/03/2024 was confirmed as being available on the Applicants website. An annual Operations Compliance Report was not completed for 2025 and remains outstanding and therefore has not been made available on the website within the specified timeframe
A40	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	NC	Previous Operations Compliance Report dated 7 March 2024 was confirmed as being available on the Applicants website. An annual Operations Compliance Report was not completed for 2025 and remains outstanding and therefore has not been made available on the website within the specified timeframe
E3	The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	NC	Evidence was provided demonstrating the submission of documentation as required by this condition was submitted to the Planning Secretary, however it was outside of the seven day timeframe (Occupation certificate date being 15 July 2026).
C14	Prior to the commencement of any construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary. The CEMP must include, but not be limited to, the following: (a) Details of: (i) hours of work; (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) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	OFI	A review of the CEMP (Buildcorp, Rev 04) confirmed that it adequately addressed the requirements of this condition. The March 2026 IEA identified an OFI with regard to updating the ESCP to update the ESCP to reflect the site conditions current at that time, this was not completed, however it is noted that construction is now complete. Observations made during the site inspection identified a small section of rill erosion occurring within a landscaped area adjacent to the driveway. Landscape defects works were occurring at the time of the site inspection.

Condition	Requirement	Assessment	IEA Finding (Summary)
	(vii) community consultation and complaints handling as set out in the Community Communication Strategy required by condition C10; (viii) the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; (b) Construction Traffic and Pedestrian Management Sub-Plan (condition C16); (c) Construction Noise and Vibration Management Sub-Plan (condition C17); (d) Construction Soil and Water Management Sub-Plan (condition C18); (e) Construction Waste Management Sub-Plan (condition C19); (f) an unexpected finds protocol for contamination and associated communications procedure; (g) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; (h) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site; (i) details of location of protective fencing (exclusion fence) to protect the significant vegetation on the southern side of the site; (j) details to demonstrate that the proposed exclusion fence on the site would not impinge on species movement within and adjoining the site; (k) details of all mitigation and management measures to ameliorate impacts on flora and fauna during the construction works as indicated in the BDAR Loreto Normanhurst Biodiversity Assessment Report (version 6), prepared by Eco Logical Australia and dated 16 December 2020.		
C18	The Applicant must prepare a Construction Soil and Water Management Plan (CSWMP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landform 2004) commonly referred to as the 'Blue Book'; (c) provide a plan of how all construction works will be managed in	OFI	A review of the CSWMP (TTW, Rev 2) confirmed that it adequately addressed the requirements of this condition. It is noted that construction of substage 4 is now complete. Observations made during the site inspection identified: Landscaping defects work was being completed Minor erosion occurring within a landscaped area adjacent to the driveway Coir logs installed in steep sections of the garden beds to minimise erosion during heavy rainfall.

Condition	Requirement	Assessment	IEA Finding (Summary)
	a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (d) detail all off-Site flows from the Site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to, 1 in 5-year ARI.		
C21	Prior to the commencement of construction, the Applicant must install erosion and sediment controls and other soil and water management measures in accordance with the CSWMSP (Schedule 3 condition C18).	OFI	Observations made during the site inspection identified: • Landscaping defects works were being completed • Minor erosion occurring within a landscaped area adjacent to the driveway • Coir logs installed in steep garden beds to minimise erosion during heavy rainfall
D23	All erosion and sediment control measures must be effectively implemented and maintained in accordance with the CSWMSP (Schedule 3 condition C17).	OFI	
F17	Notwithstanding Schedule 3 condition D34, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide reasonable mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level. Details of outdoor lighting must also be provided to the CCC for information.	OFI	The Design certificate provided confirmed that lighting design was in accordance with relevant standards BASSIX and BCA requirements as well as complying with DA conditions A22 and A23. The installation certificate confirmed that all electrical work was completed in accordance with the relevant standards, BCA and BASIX requirements. Consultation Reponses received from a member of the CCC outlined concerns with the lighting for the parking area stating strong lights on high poles kept on all night and the boarding house with lights on every night and that adequate screening has not been installed.

3.6 Construction Environmental Management Plan and Associated Sub-Plans

The development consent includes conditions that outlines the items that must be addressed in the environmental management plans as follows:

- Condition C14: Construction Environmental Management Plan (CEMP)
- Condition C16: Construction Traffic and Pedestrian Management Sub-Plan (CTPMP)
- Condition C17: Construction Noise and Vibration Management Sub-Plan (CNVMP)
- Condition C18: Construction Soil and Water Management Plan (CSWMP)
- Condition C19: Construction Waste Management Sub-Plan (CWMSP)

At the time of the site inspection, construction works were complete and the construction contractor had demobilised offsite. The only works occurring were related to defect works associated with the boarding house interior and landscaping were being undertaken for sub-stage 4.

The auditor confirmed that there had been no changes to the CEMP or associated sub plans within the audit period. The review of the management plans in the previous IEA (March 2026) deemed that they adequately addressed the Project requirements and contained adequate environmental controls and mitigation measures. Therefore, a review of these management plans in this IEA was not considered necessary.

3.6.1 Construction Environmental Management Plan

Condition C14 of SSD 8996-MOD-2 outlines the items that the CEMP must include as a minimum.

No changes to the CEMP (Buildcorp, Revision 5) occurred within the audit period. The previous review identified:

- Dust and odour management sections identified adequate mitigation measures and parameters and criteria for water quality monitoring
- External lighting design and mitigation measures were included
- Waste Management section included all waste streams and estimated quantities
- Flora and fauna management section included a process on what to do it the event an animal is present/ injured on site
- Aboriginal and non-Aboriginal heritage – Unexpected finds process included Weed and pest management (noting this is a requirement under condition D19) sections includes controls and mitigation measures
- Traffic management is addressed in a standalone subplan and a summary of mitigation measures are included in Section 2 of the CEMP
- Noise and vibration management is addressed in a standalone subplan and a summary of mitigation measures are included in Section 3 of the CEMP

3.7 Comparison of predicted and Actual Impacts

An assessment of compliance between actual and predicted impacts as documented in the Environmental Impact Statement (EIS) (dated 18 June 2019) has been provided in **Table 8.**

Table 8. Comparison of predicted and Actual Impacts

Reference EIS Document	Predicted Impact	Observed Actual Impact during the IEA	Compliance Assessment
Stage 1 Works – Drawings A003 & A004 (Allen Jack + Cottier, 11/08/2023) – stamped approved plans (DPH&I, 22/05/2024)	Extent of works applicable to Sub-Stages 1 to 4 of the development	MOD 2 included updated Stage 1 Architectural Drawings which were listed in the consolidated consent for MOD 2 dated 26/05/2026: • A0005 Rev 10 - Site elevations • A0007 Rev 10 – A008 Rev 10 Site sections • A0010 Rev 7 – Overall 3D view – Stage 1 envelopes • A0011 Rev 6 - Overall 3D view - Future projects • A0031 Rev 6, A0036 Rev 6, A0041 Rev 6 and A0046 Rev 6 – 3D Northeast - Revised envelopes future Sub-stages 1 – 4 were complete at the time of this IEA, with only minor defects work being undertaken at the time of the site inspection. All works associated with sub-stages 1 to 4 were observed to be within the boundaries of the Stage 1 scope identified within the approved drawing/s.	Compliant
Loreto Normanhurst Pennant Hills - SSDA Re-Submission Car Parks + Site Through Link Landscape Report (Oculus, July 2021) Loreto Normanhurst Concept Proposal and Stage 1 (SSD-8996) Landscape Plans (Context)	Proposed landscaping and tree retention plan for the Sub-Stages 1,2 and 3 of the development. Proposed landscaping and tree retention plan for the Sub-Stage 4 of the development	Landscaping for Sub-stages 1 – 4 were complete at the time of this IEA, with minor defects works being completed at the time of the site inspection. Landscaping appeared to be in accordance with the approved landscape plans. No impacts associated with landscaping was observed during the site inspection	Compliant
Environmental Impact Statement (Ethos Urban, 18 June 2019) Modification Report Loreto Normanhurst School Redevelopment - Concept Proposal and Stage 1 (Ethos Urban, 7/11/2023)	Solar Access and Overshadowing	The overshadowing was predicted from the Boarding House following the Stage 1 works. Construction works on the Boarding House was complete at the time this IEA. The modification report (MOD 1) confirmed that the proposed technical increase in height would not result in any perceptible amenity impacts on adjoining properties relating to overshadowing.MOD 2 did not include any changes resulting in a change to the predicted overshadowing.	Compliant
Environmental Impact Statement (Ethos Urban, 18 June 2019)	View Impact and Visual Privacy – No impact predicted as a result of mitigations applied	Sub-stages 1 to 4 (including landscaping) were complete at the time of this IEA.	Compliant

Reference EIS Document	Predicted Impact	Observed Actual Impact during the IEA	Compliance Assessment
Modification Report Loreto Normanhurst School Redevelopment - Concept Proposal and Stage 1 (Ethos Urban, 7/11/2023)		Vegetation proposed to be retained for visual screening purposes was observed to be retained during the IEA.	
Heritage Impact Statement (Weir Phillips, January 2019) Heritage Compliance Letter (Ecological Australia, 7/09/2023)	Heritage Impacts – No impacts	Sub-stages 1 to 4 were complete at the time of this IEA, with only minor defects work being undertaken No impacts on the identified structures of heritage significance were observed. The heritage compliance letter from Ecological submitted as part of the modification confirmed that works could occur under the existing HHA.	Compliant
Loreto Normanhurst Masterplan - Aboriginal Cultural Heritage Assessment (Ecological Australia, 17 December 2020)	Aboriginal Archaeology – No impacts	Sub-stages 1 to 4 were complete at the time of this IEA, with only minor defects work being undertaken. No impacts on the identified structures of Aboriginal cultural heritage were observed.	Compliant
Transport Assessment Report (Ason Group, 22 January 2019) Modification Report Loreto Normanhurst School Redevelopment - Concept Proposal and Stage 1 (Ethos Urban, 7/11/2023)	Sub-stages 1 to 3 were complete at the time of this IEA. Sub-stage 4 development is located away from the main school buildings, therefore pedestrian (staff and students) and construction vehicle interactions have been minimised. A traffic and pedestrian management plan have been developed and will be implemented for sub-stage 4 works to further minimise any potential impacts.	Sub-stages 1 to 4 were complete at the time of this IEA, with only minor defects work being undertaken, however this did not involve the use of machinery / vehicles to be present /moving on site. No construction related traffic impacts were observed during the construction phase for sub-stage 4. Mitigation measures proposed in the traffic and pedestrian management plan were assessed as part of the scope of this IEA and considered suitable.	Compliant
Construction & Operational Noise Report (RWD, December 2020)	Exceedances of noise management levels of up to 11dBA at residences to the south (Osbourne Road) and north (Mt Pleasant Ave of the site may be expected during excavation period when major equipment is located on site. This magnitude of exceedance is consistent with similar sites where residences overlook the development.	No noise complaints were registered during the audit period. Note: there was one general enquiry as to when “noisy construction works” for the boarding house would be complete.	Compliant
Construction & Operational Noise Report (RWD, December 2020)	A minimum distance of 40 m is to be maintained between vibration generating activities and the surrounding residential receivers.	No vibration related actives occurred during this audit period.	Compliant
Biodiversity Development Assessment Report (Ecological Australia, 14 January 2019)	As part of the concept proposal and Stage 1 works, 0.38 ha of the planted Blue Gum High	No vegetation clearing occurred within the audit period. Vegetation cleared during previous audit	Compliant

Reference EIS Document	Predicted Impact	Observed Actual Impact during the IEA	Compliance Assessment
	Forest vegetation community will require removal.	periods was observed to be within the boundaries of the Stage 1 scope identified within the approved drawing/s.	
Biodiversity Development Assessment Report (EcoLogical Australia, 14 January 2019)	No threatened flora or fauna species were recorded within the school site, including any microbat habitats within any of the school buildings on campus.	No vegetation clearing occurred within the audit period. No threatened flora or fauna species were recorded within the school site, including any microbat habitats within any of the school buildings on campus.	Compliant
Arboricultural Assessment Report (Earthscape Horticultural Services, January 2021)	Tree Removal and Protection - A total of 78 trees within or in proximity to the Stage 1 works area are identified as being necessary for removal. Of these, 72 trees will be replaced as part of the new Stage 1 landscape proposal.	No vegetation clearing occurred in the audit period Vegetation cleared during previous audit periods was observed to be within the boundaries of the Stage 1 scope identified within the approved drawing/s. Specific tree retention and replacement planting had been observed however counts on the precise number of tree's removed or planted as part of the landscaping was beyond the scope of this IEA. It is noted that some trimming of trees located adjacent to the boarding house had occurred in accordance with the Arborist report.	Compliant
Preliminary Site Investigation Report (Environmental Investigation Services, 30 April 2019)	The site is considered to have potential for moderate contamination, due to: Polycyclic Aromatic Hydrocarbons (PAH) above the human health-based site assessment criteria; Total Recoverable Hydrocarbons, benzo(a)pyrene and zinc were encountered above the ecological based site assessment criteria; Minor elevations of some metals in groundwater were identified, however this is considered to be consistent with regional groundwater conditions and One fibre cement fragment collected from the surface of the site was found to contain chrysotile asbestos.	An investigation undertaken by EnviroReview (22 February 2022) did not identify any additional contamination beyond what was identified as part of the Preliminary Site Investigation. No additional investigations were required within this audit period. No evidence of contamination noted during audit period.	Compliant
Environmental Impact Statement (Ethos Urban, 18 June 2019)	The proposed control measures will prevent sediment laden stormwater from flowing into adjoining land, nearby bushland or roadways during the construction phase of the development.	Sub-stages 1 to 4 were complete at the time of this IEA, with only minor defects work being undertaken No evidence of sediment laden water released from the site was observed during this IEA.	Compliant

Reference EIS Document	Predicted Impact	Observed Actual Impact during the IEA	Compliance Assessment
Bushfire Protection Assessment (EcoLogical Australia, 14 January 2019) Bushfire Code and Bushfire Hazard Solutions (3/11/2023)	The site is managed by an existing Asset Protection Zone (APZ). The APZ setback required for the site under the Planning for Bushfire Protection (PBP) 2006 is 70 m. The existing APZ is proposed to be retained under this application, and all future buildings including the Stage 1 works are situated outside the 70 m APZ.	No additional potential bushfire impacts identified during the IEA. This was also confirmed in an updated assessment report included for the MOD 1 application.	Compliant
Waste Management Plan (Foresight Environmental, 14 January 2019)	Construction Waste Management – Table 14, Boarding House composition of construction waste by volume	Construction for substage 1 - 4 was complete at the time of this IEA, with only minor internal building and landscaping defects works being undertaken. Waste bins had been removed offsite. There was no evidence of waste migrating across or offsite.	Compliant

3.8 Environmental Performance and Community Feedback

At the time of the site inspection, minor defect works were being undertaken for sub-stage 4. The works were focused on the interior fit out of the boarding house and landscaping.

3.8.1 Complaints

All complaints received are logged on a Community Issues Register, a live document that is continuously updated by the Applicant's representative (CTPG and Buildcorp).

A summary of complaints received during the audit period and the responses provided by the project are outlined in **Table 9**.

The Auditee advised that the complaints register for sub-stage 4 will be uploaded together with this audit report on the Applicant's website.

3.8.2 Community Feedback

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

3.8.3 Incidents

No reportable environmental incidents were recorded during the IEA period.

3.8.4 Non-Compliances and Recommendations

Four NCs across six conditions and two OFIs against five conditions were identified during the IEA. Recommended actions to address each of these NCs and OFIs have been provided in **Table 10**. The complete action plan, including consideration by the Applicant has been provided in **Appendix G**.

Implementation of the recommended actions should be verified as part of the subsequent IEA or Compliance Report.

Table 9. Complaints Summary

Date	Complaint Type/Description	Detail of Issue	Project Response	Response Adequacy
12/06/2026	Parking /verge damage	Complaint regarding council verge - Construction workers and residents have been parking over the course of the project. Complainant requested for several improvements to be made to the council verge.	Buildcorp carried out general tidying including weeding and a general tidy up. **Note:** Buildcorp are unable to construct/ improve Council assets.	Adequate
26/03/2026	Traffic management	Resident raised concerns to Mayor Waddell and Councillors, regarding: • Increasing traffic congestion and illegal parking in during school events and weekends • Vehicles parking on both sides of the road, including in No Parking zones • Poor visibility of parking signage and limited parking enforcement	Responded to concerns about traffic impacts from Loreto's Open Day on 21/03/2026.Letter to Mayor on 8/4/26: • Outlined extensive traffic management measures implemented • Noted significant planning and operational investment to minimise disruption to neighbours • Pennant Hills Road experiences substantial background traffic unrelated to the School • Advised no complaints were received from Adventist Aged Care regarding access on the day • Noted increased residential density in the area has contributed to higher baseline traffic and parking demand • Stated parking enforcement, signage visibility and ranger patrols are Council responsibilities • Emphasised the School has no authority to enforce parking compliance • Reaffirmed the School's commitment to working collaboratively with Council, Police and residents • Maintained that Loreto is meeting reasonable expectations in managing traffic impacts associated with major events	Adequate
16/04/2026	Property access	Complaint received in relation to trespass on private property by a contractor in relation to the school (Surveyor). Complainant was agitated that the neighbours hadn't been notified by Council that there were impending works and said that the oval run off should go down to the creek and not be diverted to their side of the road.	Response was provided outlining works that were being undertaken. Runoff from the construction works was managed in accordance with the approved CSWMP	Adequate
March/April/May 2026[1]	Food deliveries	Uber Eats delivery incorrectly delivered to a neighbouring property instead of the site address	Buildcorp reminded all workers that food deliveries must be addressed to 32 Mount pleasant via a	Adequate

Date	Complaint Type/Description	Detail of Issue	Project Response	Response Adequacy
			Toolbox Talk. Site noticeboards were erected around the site to remind workers of the protocols for food delivery.	
March/April/May 2026[1]	Traffic management	Resident was concerned about the "No Right Hand Turn'' impacts to traffic flow and safety on Mount Pleasant Avenue.	Urbis provided a response to the resident and noted that the "No Right Hand Turn" signage has been implemented by Hornsby Shire Council as a trial measure to control traffic and was not requested by the School.	Adequate
March/April/May 2026[1]	Noise	A resident enquired requesting an update on when noisy construction works at the Boarding House would be complete.	Loreto provided a response to the resident and noted the construction is in the final stages. The following week the school prepared a letter box drop updating residents on the construction finalisation process. **Note:** no specific noise complaint made, this was a general enquiry regarding the overall works.	Adequate
20/05/2026	Traffic management	Concerns raised regarding traffic congestion and road safety associated with school pick-up and drop-off activities: • Dangerous driving behaviour, vehicles turning from incorrect lanes on the Pacific Highway during peak school traffic, near-miss collisions, excessive horn use and ongoing congestion • Students congregating close to the roadway while waiting for transport • Reports of late-night noise and disturbances caused by groups believed to be associated with the school Complainant provided several suggested solutions.	The Deputy Principal and Director of Business Services met with the resident and advised: • Designated Pick Up and Drop Off locations provided, which will be monitored • Unable to install an internal access road through bushland. An internal road has been established at the top of site running in parallel with Pennant Hills Road • Will discuss clearer school zone signage with Council • Staff / parents reminded to park onsite where possible	Adequate
12/06/2026	Road verge damage	Complaint received regarding the condition of the road verge and roadside area following completion of the McCabe Boarding House construction works: • Road verge left uneven, largely bare and with damaged vegetation due to construction-related parking and traffic • Concerns raised regarding erosion, mud runoff, road cleanliness, safety, and the overall presentation of the streetscape	Response provided confirming that a review of each item of concern would occur. Buildcorp tidied up the verge and reviewed google maps footage to compare it to its 2024 state, showing the verge is in a very similar state as pre construction.	Adequate
25/06/2026	Property damage	A bus attempting to enter the slip road reversed into the neighbour's letterboxes, located directly opposite gate 1 on Osborn Road resulting in damage to three letterboxes.	An investigation identified that the bus was not a school bus or associated with the school, it was a public bus and TfNSW was notified of the incident.	Adequate

Date	Complaint Type/Description	Detail of Issue	Project Response	Response Adequacy
28/06/2026	Traffic management / parking	Complaint received alleging ongoing traffic management issues and non-compliance with development consent: • Non-compliance with pre-construction traffic obligations, displacement of school-related traffic into surrounding residential streets, unauthorised direction of parking enforcement on public roads • Questions regarding the integrity of a traffic survey • Concerns about weekend and Saturday traffic operations	Letter sent to resident on: 17 July 2026 outlining that the Boarding School project was approved and constructed in accordance with the SSD Consent requirements and all necessary certification processes. The School continues to implement approved traffic, parking and transport management measures, including onsite pick-up/drop-off arrangements. The School encourages compliance with parking and traffic laws but has no authority to enforce them. The School rejects allegations that it influenced the recent Hornsby Council traffic survey and states gate operations were not altered during the survey period.	Adequate

[1]No specific dates provided.

3.8.5 Community Feedback

All community feedback including complaints are discussed and recorded at the CCC. Records of CCC meetings including discussions related to complaints are published on the Applicant's website:

(https://www.loretonh.nsw.edu.au/about/master-plan/community-engagement/).

3.8.6 Incidents

No reportable environmental incidents were recorded during the IEA period.

3.8.7 Non-Compliances and Recommendations

Four NCs across six conditions and two OFs against five conditions were identified during the IEA. Recommended actions to address each of these NCs and OFIs have been provided in **Table 10**. The complete action plan, including consideration by the Applicant has been provided in **Appendix G**.

Implementation of the recommended actions should be verified as part of the subsequent IEA or Operation Compliance Report for sub-stage 4.

Table 10. Recommended Actions to resolve Identified Non-Compliances

Unique ID No[1]	Relevant Condition / Section	Audit Finding	Recommended Actions
NC-01	**A2:** The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS, except where superseded by the RtS, SRtS, and SSD-8996-MOD-1; and SSD-8996-Mod-2 (d) in accordance with the approved plans in the table below (as may be amended by the conditions in Schedule 3 Part A):	Refer the findings against conditions: • A3 • A36 • A38 • A39 • A40 • E3	Refer to the following Unique NC ID numbers for specific actions: • NC-02 • NC-03 • NC-04 • NC-05
NC-02	**A3:** Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; (b) any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and (c) the implementation of any actions or measures contained in any such document referred to in (a) above.	The letter dated 3 August 2026 stated that the previous IEA (27/08/2025 - 27/02/2026) was considered to generally satisfy the reporting requirements of the Consent and the IA PAR. The letter also requested the following items for future IEAs: 1. Site inspection to be conducted during the audit period in accordance with the IA PAR . • The site inspection for this IEA was undertaken in accordance with the IA PAR 2. The IEA report and RAR be published on the project website. • A copy of the report was confirmed as being published on the project website, however section 4.3.2 of the IA PAR specifically requires the proponent to submit their response to the audit recommendations to the Department in a document separate to the final IEA report. 3. A status update for all actions in the RAR be reported in the next IEA until all actions complete. • This IEA includes a review of the status of the recommendations made in the previous IEA report.	For all future audits, complete and submit responses to the audit recommendations to the Department in a separate document to the final IEA report.

Unique ID No[1]	Relevant Condition / Section	Audit Finding	Recommended Actions
		4. Following submission of the IEA report a review (and update if necessary) of strategies, plans, programs required under this consent be completed. • Document review /updates did not occur, however it is important to note that at the time of this audit, construction was complete and only minor defects work was being undertaken.	
NC-03	**A36**: Within three months of: (a) the submission of a compliance report under Schedule 3 condition A38; (b) the submission of an incident report under Schedule 3 condition A32; (c) the submission of an Independent Audit under Schedule 3 condition D37; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under Schedule 3 condition A2 which requires a review the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	The annual Operation Compliance Report for sub-stages 1 - 3 (2025) remains outstanding. A letter from the DPHI in March 2026 approved the cessation of ongoing annual Operational Compliance Reporting for sub-stages 1 to 3. This approval did not include any detail to state that the outstanding 2025 report was no longer required. Therefore, compliance with this condition for sub-stages 1 - 3 has not been met and the 2025 report remains outstanding. It is noted that the approval to cease compliance reporting does not include sub-stage 4 (subject to this audit) and annual compliance reports for sub-stage 4 will still be required in accordance with the Compliance Reporting Post Approval Requirements (2026).	Notify the Planning Secretary and the Certifier in writing that a review is being undertaken where triggered by this condition.
NC-04	**A38:** Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).	The annual Operation Compliance Report for substages 1 - 3 (2025) remains outstanding. A letter from the Department in March 2026 approved the cessation of ongoing annual Operational Compliance Reporting for Sub-stages 1 to 3. This approval did not include any detail to state that the outstanding 2025 report was no longer required. Therefore, compliance with this condition for substages 1 - 3 has not been met and the 2025 report remains outstanding. It is noted that the approval to cease compliance reporting does not include substage 4 (subject to this audit) and annual compliance reports for substage 4 will still be	1. Seek clarification from the Department whether the approval for the cessation of future compliance reporting for sub-stages 1-3 includes the outstanding report for 2025. If the Department confirms the outstanding report is still required to be submitted: 2. Complete the Compliance report in accordance with the Compliance Reporting Post Approval Requirements (2026). 3. Submit the Operation Compliance Report for sub-stages 1 - 3 (2025). 4. Publish the compliance report within 60 days after the submission of the report to the Planning Secretary.

Unique ID No[1]	Relevant Condition / Section	Audit Finding	Recommended Actions
		required in accordance with the Compliance Reporting Post Approval Requirements (2020).	
	A39: Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.	Section 2.1 Table 1 of the Compliance Reporting PAR, 2026 sets out the phase, timing and minimum frequency for compliance reporting. Operational compliance reports are required on an annual basis (at a minimum). An annual Operations Compliance Report was not completed for 2025 (sub-stages 1-3) and remains outstanding.	
	A40: The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	Previous Operations Compliance Report dated 7/03/2024 was confirmed as being available on the Applicants website. An annual Operations Compliance Report was not completed for 2025 and remains outstanding and therefore has not been made available on the website within the specified timeframe	
NC-05	**E3:** The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	Evidence was provided demonstrating the submission of documentation as required by this condition was submitted to the Planning Secretary, however it was outside of the seven day timeframe (Occupation certificate date being 15 July 2026).	Ensure all documentation given to the Certifier is provided to the Planning Secretary within seven days after the certifier accepts it.
OFI-01	**C14**: Prior to the commencement of any construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary. The CEMP must include, but not be limited to, the following: (a) Details of: (i) hours of work; (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;	A review of the CEMP (Buildcorp, Rev 04) confirmed that it adequately addressed the requirements of this condition. The March 2026 IEA identified an OFI with regard to updating the ESCP to update the ESCP to reflect the site conditions current at that time, this was not completed, however it is noted that construction is now complete. Observations made during the site inspection identified a small section of rill erosion occurring within a landscaped area adjacent to the driveway. Landscape defects works were occurring at the time of the site inspection.	Undertake repair work to rectify the erosion and implement additional measures to prevent it from re-occurring.

Unique ID No[1]	Relevant Condition / Section	Audit Finding	Recommended Actions
	(vi) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting; (vii) community consultation and complaints handling as set out in the Community Communication Strategy required by condition C10; (viii) the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; (b) Construction Traffic and Pedestrian Management Sub-Plan (condition C16); (c) Construction Noise and Vibration Management Sub-Plan (condition C17); (d) Construction Soil and Water Management Sub-Plan (condition C18); (e) Construction Waste Management Sub-Plan (condition C19); (f) an unexpected finds protocol for contamination and associated communications procedure; (g) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; (h) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site; (i) details of location of protective fencing (exclusion fence) to protect the significant vegetation on the southern side of the site; (j) details to demonstrate that the proposed exclusion fence on the site would not impinge on species movement within and adjoining the site; (k) details of all mitigation and management measures to ameliorate impacts on flora and fauna during the construction works as indicated in the BDAR Loreto Normanhurst Biodiversity Assessment Report (version 6), prepared by Eco Logical Australia and dated 16 December 2020.		

Unique ID No[1]	Relevant Condition / Section	Audit Finding	Recommended Actions
	C18: The Applicant must prepare a Construction Soil and Water Management Plan (CSWMP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landform 2004) commonly referred to as the 'Blue Book'; (c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (d) detail all off-Site flows from the Site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to, 1 in 5-year ARI.		Undertake repair work to rectify the erosion and implement additional measures to prevent it from re-occurring.
	C21: Prior to the commencement of construction, the Applicant must install erosion and sediment controls and other soil and water management measures in accordance with the CSWMSP (Schedule 3 condition C18).		
	C23: All erosion and sediment control measures must be effectively implemented and maintained in accordance with the CSWMSP (Schedule 3 condition C17).		
OFI-02	**F17:** Notwithstanding Schedule 3 condition D34, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide reasonable mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level. Details of outdoor lighting must also be provided to the CCC for information.	The Design certificate provided confirmed that lighting design was in accordance with relevant standards BASSIX and BCA requirements as well as complying with DA conditions A22 and A23. The installation certificate confirmed that all electrical work was completed in accordance with the relevant standards, BCA and BASIX requirements. Consultation received from a member of the CCC outlined concerns with the lighting for the the parking area stating strong lights on high	Undertake an investigation of lights being left on and glare impacts on adjacent residential properties: • Confirm hours and which lights are required to be on for parking areas and the boarding house • Investigate additional screening that could be installed to reduce glare impacts such light shields, use of soft lighting

Unique ID No[1]	Relevant Condition / Section	Audit Finding	Recommended Actions
		poles kept on all night and the boarding house with lights on every night and that adequate screening has not been installed.	

[1] Non-conformances resulting in the same recommended action have been grouped.

4 Conclusion

The IEA was undertaken in accordance with Condition 37 and 38 of SSD 8996-MOD-2. The IEA was conducted to:

- Assess whether the project is being undertaken from an environmental point of view in accordance with best practice, standards, and legislative requirements
- Assess the level of compliance against the conditions of approval
- Assess whether current practices and standards are being implemented
- Evaluation of the overall environmental performance of the site
- Assess the adequacy and implementation of management plans
- Identify recommended actions for the overall improvement of environmental performance

The IEA was undertaken between 3 July 2026 and 17 July 2026, capturing evidence for the period from 28 February 2026 to 17 July 2026. The IEA criteria comprised the conditions of SSD 8996-MOD-2, the CEMP, and associated sub-plans. Overall, the Applicant demonstrated compliance with **95%** of the IEA criteria, with a total of four NCs identified against six conditions and two OFIs against five conditions.

Recommended actions to address the IEA findings have been provided in **Table 10**. The Applicant has considered these recommendations and an action plan to address the identified NCs is provided in **Appendix G**. Implementation of the action will be verified during the subsequent IEA.

The IEA team thanks all participants for their time, assistance, and cooperation in facilitating the IEA.

5 References

Bureau of Meteorology (BoM) 2026, Parramatta, New South Wales August 2025 Daily Weather Observations, Available at: https://www.bom.gov.au/climate/dwo/202508/html/IDCJDW2107.202508.shtml

Department of Planning, Housing and Infrastructure (DPHI), Independent Audit – Post Approval Requirements, March 2026

6 LIMITATIONS AND DISCLAIMER

Onterris Australia Pty Ltd (Onterris) has prepared the following report for the exclusive benefit of CTPG (Client) and for the singular purpose of an independent Environmental Audit at the Loreto Normanhurst Secondary School, Normanhurst, NSW. All interpretations, finding or recommendations outlined in this report should be read and relied upon only in the context of the report as a whole.

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

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

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

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

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

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

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

d. for any consequential or indirect losses, or for loss of profit or goodwill or any loss or corruption of any data, database or software.

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

Appendix A Planning Secretary IEA Team Approval

Department of Planning, Housing and Infrastructure

NSW Planning ref: SSD-8996-PA-64

Marina Ugonotti
Principal
LORETO NORMANHURST LIMITED
91-93 Pennant Hills Road
Normanhurst NSW 2076

19/02/2025

Sent via the Major Projects Portal only

Subject: Loreto Normanhurst School Redevelopment – Independent Auditor Agreement

Dear Ms Ugonotti

I refer to your request (SSD-8996-PA-64) for the Planning Secretary's approval of a team of suitably qualified, experienced, and independent persons to conduct the upcoming Independent Environmental Audit (**IEA**) for construction of Stage 1 of the Loreto Normanhurst School Redevelopment project (**development**), submitted as required by Schedule 3, Condition D37 of SSD-8996 as modified (**consent**) to NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) on 10 February 2025.

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

In accordance with Schedule 3, Condition D37 of the consent and the *Independent Audit Post Approval Requirements* (2020) (**IAPAR**), as nominee of the Planning Secretary, I agree to the appointment of the following team from Epic Environmental Pty Ltd:

- Chris Griffiths as lead auditor,
- Kirsty Douglas as technical reviewer; and
- Gabrielle Head as assistant auditor.

Please ensure this correspondence is appended to each final IEA report.

The IEA must be prepared, undertaken, and finalised in accordance with the conditions of consent and the IAPAR. Failure to meet these requirements will require revision and resubmission.

The lead auditor must also attend the site inspection/s that form a part of the IEA and final report.

Please note that this is agreement for the IEA team listed above for the remainder of the development's Stage 1 construction phase only. If there are any changes to the approved audit organisation and/or the proposed team for this phase of construction, a new request must be submitted to and agreed by the Planning Secretary prior to commencement of the relevant IEA.

For all future stages of the project, you must submit a request for a different IEA organisation and team to be approved by the Planning Secretary, where required under the consent or the IAPAR.

Please also note that this approval is for SSD-8996 as modified only, and each such request across different projects is assessed on the merits of the proposed team and the requirements of each project. Approval for a team on one project does not necessary guarantee their suitability for agreement on another.

NSW Planning nevertheless reserves the right to request an alternate auditor or audit team for future audits, should it be appropriate in the circumstances.

Should you wish to discuss the matter further, please contact Maria Divis, Senior Compliance Officer on (02) 8275 1156 or email compliance@planning.nsw.gov.au

Yours sincerely

Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary

Appendix B Independent Auditor Declaration Forms

Independent Audit Report Declaration Form Template

Final Independent Audit Report Declaration Form – Lead Auditor	
Project Name	Loreto Normanhurst School Redevelopment - Independent Environmental Audit
Application Number	SD8996
Project Address	91-93 Pennant Hills Road, Normanhurst NSW 2076
Proponent	Carmichael Tompkins Property Group
Title of Audit	Loreto Normanhurst School Redevelopment - Stage 1, sub stage 4 IEA
Date	9/09/2026

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

i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);

ii. the findings of the audit are reported truthfully, accurately and completely;

iii. I have exercised due diligence and professional judgement in conducting the audit;

iv. I have acted professionally, objectively and in an unbiased manner;

v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;

vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;

vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and

viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

Final Independent Audit Report Declaration Form – Lead Auditor	
b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)	
Name of Auditor	Chris Griffiths
Signature	Chris Griffiths
Qualification	Lead Auditor (Exemplar Global, No. C-449888); BSci (Environmental Management)
Company	Onterris Australia
Company Address	Suite 107, Level 7, 1 York Street Sydney NSW 2000

Independent Audit Report Declaration Form Template

Final Independent Audit Report Declaration Form – Lead Auditor	
Project Name	Loreto Normanhurst School Redevelopment - Independent Environmental Audit
Application Number	SD8996
Project Address	91-93 Pennant Hills Road, Normanhurst NSW 2076
Proponent	Carmichael Tompkins Property Group
Title of Audit	Loreto Normanhurst School Redevelopment - Stage 1, sub stage 4 IEA
Date	9/09/2026

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

i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);

ii. the findings of the audit are reported truthfully, accurately and completely;

iii. I have exercised due diligence and professional judgement in conducting the audit;

iv. I have acted professionally, objectively and in an unbiased manner;

v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;

vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;

vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and

viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

Final Independent Audit Report Declaration Form – Lead Auditor	
b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)	
Name of Auditor	Kirsty Douglas
Signature	
Qualification	Lead Auditor (Exemplar Global, No. 210439); BEnvSci; Cert IAP2 Australasia (Engagement)
Company	Onterris Australia
Company Address	Suite 107, Level 7, 1 York Street Sydney NSW 2000

Independent Audit Report Declaration Form Template

Final Independent Audit Report Declaration Form – Lead Auditor	
Project Name	Loreto Normanhurst School Redevelopment - Independent Environmental Audit
Application Number	SD8996
Project Address	91-93 Pennant Hills Road, Normanhurst NSW 2076
Proponent	Carmichael Tompkins Property Group
Title of Audit	Loreto Normanhurst School Redevelopment - Stage 1, sub stage 4 IEA
Date	9/09/2026

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

i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);

ii. the findings of the audit are reported truthfully, accurately and completely;

iii. I have exercised due diligence and professional judgement in conducting the audit;

iv. I have acted professionally, objectively and in an unbiased manner;

v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;

vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;

vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and

viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

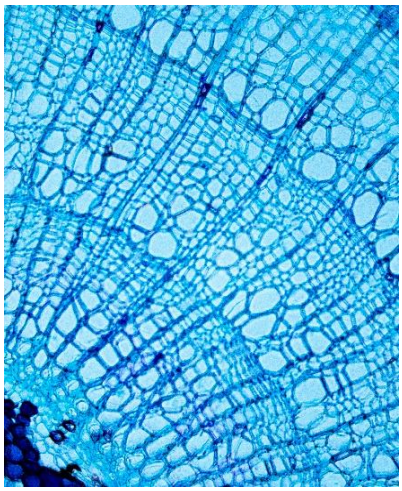
a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that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

Final Independent Audit Report Declaration Form – Lead Auditor	
b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)	
Name of Auditor	Gabrielle Head
Signature	
Qualification	BSci (Environmental Biology); BSCi (Science in Information Technology), B.Creative Intelligence and Innovation
Company	Onterris Australia
Company Address	Suite 107, Level 7, 1 York Street Sydney NSW 2000

Appendix C Independent Environmental Audit Plan

Independent Environmental Audit

Audit Plan - Loreto Normanhurst School – Stage 1, substage 4



Prepared for: Carmichael Tompkins Property Group

Prepared by: Onterris Australia

3 July 2026

Revision A

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For Planet & Progress™

Document Control

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1 INTRODUCTION

Onterris Australia Pty Ltd (Onterris) has been engaged by Carmichael Tompkins Property Group (CTPG) to undertake an Independent Environmental Audit (IEA) for Stage 1, substage 4 of the construction works at the Loreto Normanhurst School (the site).

Substage 4 is the current construction stage and includes the following works:

- Relocate uniform shop
- Demolish Loreto Community House and associated buildings
- Construct boarding accommodation building
- Reconfigure P4 Primary carpark
- Landscaping

This IEA Plan provides guidance on the execution and reporting of the IEA. The IEA Plan should be reviewed by CTPG and issued to relevant auditees prior to the execution of the IEA.

1.1 Purpose

As per Clauses D38 of the State Significant Development (SSD) 8996 consent, an IEA is required to be conducted in accordance with the Department of Planning, heritage and Infrastructure's *Independent Audit Post Approval Requirements (2026).*

The IEA will be undertaken to address Clauses D37 to D42 and evaluate compliance with the SSD consent conditions and will be the final construction phase IEA.

1.2 Scope

The IEA scope will include activities undertaken at the site, in relation to the Stage 1, substage 4 construction works for the redevelopment of the Loreto Normanhurst School, Normanhurst NSW. The audit period includes project activities undertaken between 28 February 2026 to 14 July 2026.

1.2.1 IEA Period

The IEA scope will include activities undertaken at the site, in relation to the Stage 1, substage 4 construction works for the redevelopment of the Loreto Normanhurst School, Normanhurst NSW. The audit period includes project activities undertaken between 28 February 2026 to 14 July 2026. It has been advised by CTPG that the construction phase is near completion with operations planned to commence late July 2026.

1.3 Objectives

The key objectives of the IEA are to:

- Assess whether the project is being undertaken from an environmental point of view in accordance with the conditions of SSD8996, best practice, standards, and legislative requirements
- Assess the overall environmental performance of the project on the surrounding environment and sensitive receptors
- Review the implementation of environmental management plans in accordance with the conditions of consent
- Provide recommendations for the overall improvement of environmental performance

1.4 IEA Criteria

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

- Conditions of SSD 8996: Schedule 3 Parts A – F
- This includes a status review for actions / recommendations from the previous IEA (specifically Schedule E of SSD 8996)
- Community Consultation Plan (CCP)
- Construction Environmental Management Plan (CEMP)
- Construction Pedestrian and Traffic Management Plan (PTMP)
- Construction Noise and Vibration Management Plan (NVMP)
- Construction Soil and Water Management Plan (SWMP)
- Construction Waste Management Sub-plan (WMP)

2 IEA Planning

2.1 IEA Team

The IEA team members have been provided in **Table 1**. In accordance with Condition D37 of the SSD consent, an approval for the appointment of independent audit team for the IEA has been granted by the Department of Planning, Housing and Infrastructure (DPHI) on 19 February 2025 for the stage of works.

Table 1. IEA Team

Person	Role	Years' Experience	Qualifications
Chris Griffiths	Lead Auditor	20	Lead Auditor (Exemplar Global, No/ C-449888), BSCi (Environmental Management)
Kirsty Douglas	Audit Support and Technical Reviewer	20	Lead Auditor (Exemplar Global, No. 210439), BEnvSci (Conservation Biology and Ecology), GCert IAP2 Australasia
Gabrielle Head	Audit Support	3	BSci (Environmental Biology); BSCi (Science in Information Technology), B.Creative Intelligence and Innovation

2.2 CTPG Staff Participation Requirements

2.2.1 CTPG Representative

Natalie Ross and Brigid White will act as the CTPG IEA representatives during the completion of this IEA. Brigid will be responsible for organising meeting times, interview attendees and site inspection times.

2.2.2 Opening Meeting

The opening meeting will be held on site at the time of the site inspection. The meeting will be facilitated by the IEA team and will be attended by select CTPG personnel and construction contractor (Buildcorp) site representatives. CTPG's IEA representative will be responsible for organising a suitable time for undertaking the opening meeting.

2.2.3 Interviews

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

- Project Manager
- Site Manager
- Health, Safety and Environment (or similar) Representative
- Leading Hand

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

2.2.4 Site Inspection

A site inspection will be undertaken by the Onterris Lead Auditor to visually verify compliance of certain conditions. The CTPG IEA representative will liaise with relevant parties to obtain access and ensure persons are available to escort the IEA team around relevant areas of the site.

2.2.5 Closing Meeting

Within two to three weeks of the site inspection, a closing meeting (via teleconference) will be facilitated by Chris Griffiths (Onterris) and attended by all CTPG interviewees (where available). The CTPG IEA representative will be responsible for organising a suitable time for undertaking the closing meeting.

2.3 IEA Program

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

Table 2. Proposed Program for the IEA

Proposed Date	Task Description	Locations	Who
Phase I – Project Preparations			
3/07/2026	Preparation and provision of IEA Plan to CTPG	Email	Onterris
31/07/2026	Provision of management plans required for the IEA	Email	CTPG
13/07/2026	Undertake a preliminary document review	Onterris Offices	Onterris
3/07/2026 – 14/07/2026	Develop the IEA tools	Onterris Offices	Onterris
Phase II – IEA			
14/07/2026	Opening Meeting	Site	All
14/07/2026	Site Inspection 0900hrs	Site	Onterris & CTPG
14/07/2026 – 31/07/2026	IEA Interviews	Teleconference	Onterris & CTPG
21/08/2026	Closing Meeting	Teleconference	All
Phase III – IEA Reporting			
14/08/2026	Provision of additional evidence not obtained during the IEA phase	Email	CTPG
31/07/2026 – 28/08/2026	Prepare the draft IEA report	Onterris Offices	Onterris
28/08/2026	Issue the draft IEA report to CTPG	Email	Onterris
04/09/2026	CTPG provides comments on draft IEA report	Email	CTPG
11/09/2026	Issue the final IEA report to CTPG	Email	Onterris

2.4 Communication Plan

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

3 IEA Execution

The following IEA method has been prepared with reference to:

- *Independent Audit – Post Approval Requirements* (NSW Department of Planning, Industry and Environment) 2026 (March 2026)
- AS/NZS ISO 19011.2019 – *Guidelines for Auditing Management System.*

3.1 IEA Scoring Criteria

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

Table 3. IEA Scoring Criteria

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

3.2 Develop Tools

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

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

3.3 Undertaking the IEA

3.3.1 Document Review

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

3.3.2 Conduct an Opening Meeting

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

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

Meeting minutes will be maintained and issued by Onterris following the meeting, including a list of attendees.

3.3.3 Interviews

IEA interviews will be undertaken by the Lead Auditor mainly via teleconference but also on site where personnel are available. Questions delivered during the IEA interviews will be based on approval conditions or requirements applicable to the interviewees area of responsibility. The CTPG representative will be responsible for scheduling the IEA interviews with CTPG personnel.

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

3.3.4 Site Inspection

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

3.3.5 Closing Meeting

A closing meeting will be conducted with CTPG at the completion of Phase 2 of the IEA. It will provide an opportunity for Onterris to outline positive and negative findings identified during the IEA, CTPG to respond or clarify any findings, and the Onterris to confirm the process following the IEA. Meeting minutes will be maintained and issued by Onterris following the meeting, including a register of all attendees.

3.3.6 IEA Findings

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

3.4 Reporting

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

- Introduction, including
  - Background of the site
  - The IEA team
  - The objectives of the IEA
  - The IEA scope
  - The IEA period
- The IEA method, including
  - Development of IEA scope was developed
  - A summary of the IEA process adopted to determine the compliance status and assess
  - A list of the approvals and documents reviewed
  - Details of personnel interviewed including their name and position title
  - Details of site inspections undertaken
  - A summary of the consultation undertaken prior to the IEA
  - Meanings of compliance status descriptors used, as set out in this document
- The IEA findings, including
  - A summary of the assessment of compliance
  - Details of notices, orders, penalty notices or prosecutions issued in relation to the consent during the IEA period
  - Exception reporting of all non-compliances identified during the IEA period
  - A discussion of the status of actions arising from previous IEAs and the progress or outcomes of each action
- A discussion of whether the construction management plans, sub-plans and compliance documents are adequate and implemented
- A discussion of other matters considered relevant during the IEA
- A summary of complaints, and the adequacy of the response to, and management of complaints
- Details of any incidents and the adequacy of the response to, and management of such incidents
- An assessment of the compliance between actual and predicted impacts documented in environmental impact assessment
- Evidence collected through site inspections undertaken during the IEA
- Any continual environmental management improvement opportunities identified as part of the IEA
- Positive observations identified by the Auditor related to environmental management and performance
- Recommendations and opportunities for improvement

- The following appendices
  - Complete IEA checklist including responses to findings
  - A copy of documentation from the Planning Secretary agreeing to the IEA Team
  - Documentation detailing consultation with the DPHI, and other agencies or stakeholders
  - Completed and signed Independent Audit Report Declaration Form
  - Site inspection photographs
- Responses to commentary regarding the previous IEA received from the DPHI

4 General IEA Matters

4.1 Logistical Arrangements for the IEA

Transport to and from the site will be organised by CTPG. The CTPG representative will organise all teleconference arrangements for all interviews and meetings.

4.2 General IEA Matters

The Lead Auditor will complete the CTPG visitors' inductions prior to undertaking the site inspection. The Lead Auditor will be escorted at all times by a CTPG representative whilst on site.

In accordance with the site requirements, the following PPE will be worn by the Lead Auditor:

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

All other site-specific PPE will be provided by CTPG.

4.3 Matters Related to Confidentiality

All information supplied, sighted, and disclosed as part of this IEA will remain confidential and the outcomes of the IEA will only be provided to the CTPG representative for review and dissemination to relevant personnel.

4.4 Auditors Code of Conduct

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

Code of Conduct

- Auditors will act professionally, accurately and in an unbiased manner
- Auditors will strive to increase the competency and prestige of the profession
- Auditors will assist those in their employ or under their supervision in developing their professional competency
- Auditors will not undertake any assignments that they are not competent to perform
- Auditors will not represent conflicting or competing interests and will disclose to any client or employer any relationships that may influence their judgment

- Auditors will not discuss or disclose any information relating to any assignment unless required by law or authorised in writing by the client and/or their employing organization
- Auditors will not accept any inducement, commission, gift or any other benefit from client organizations, their employees or any interested party or knowingly allow colleagues to do so
- Auditors will not intentionally communicate false or misleading information that may compromise the integrity of any assignment or the personnel certification process
- Auditors will comply with Exemplar Global Certification Requirements, procedures and advisories which are relevant to their profession or certification
- Auditors will not act in any way that would prejudice the reputation of Exemplar Global or the personnel certification process and will cooperate fully with an enquiry in the event of any alleged breach of this code

4.5 Key Contacts

Table 4. Key Contacts

Name	Company and Position	Phone	Email
Natalie Ross	CTPG Associate Director /IEA Representative	0410 651 409	Natalie.ross@ctpg.com.au
Brigid White	CTPG Assistant Project Manager /IEA Representative	0466 970 857	brigid.white@ctpg.com.au
Chris Griffiths	Onterris, Lead Auditor	0498 863 242	christophergriffiths@onterris.com
Kirsty Douglas	Onterris, Auditing Assistant	0410 410 373	kirstydouglas@onterris.com

5 Limitations and Disclaimer

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

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

- Released to any other person, whether in whole or in part
- Used or relied upon by any other party
- Filed with any Governmental agency or other person or quoted or referred to in any public document

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

- Presumed the accuracy of the information provided by the Client (including its representatives)
- Has not undertaken any verification to the accuracy or reliability included in this information (with the exception where such verification formed part of the scope of works)
- Has not undertaken any independent investigations or enquiries outside the scope of works with respect to information provided for this report
- Provides no warranty or guarantee, expressed or implied, as to the accuracy or reliability of the information provided in this report

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

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

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

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

Appendix D Audit Meeting Minutes

A Montrose Environmental Company

AUDIT-IN-CONFIDENCE

OPENING MEETING AGENDA

PROJECT: CTPG Loreto Normanhurst School Redevelopment - Independent Environmental Audit (IEA)	
Site:	Loreto Normanhurst School
Auditee:	CTPG / Buildcorp
Meeting date & time (SEST)	14/07/2026 0810
Register of Attendees	David Stralow – Project Manager – Buildcorp Sam Eagleton – Undergrad Engineer – Buildcorp Brigid White – CTPG Chris Griffiths – Lead Auditor – Epic

Agenda item	**Notes**
Audit team	Chris Griffiths – Lead Auditor Gabrielle Head – Auditing Assistant Kirsty Douglas – Technical Reviewer
Audit scope	The IEA scope will include activities undertaken at the site, in relation to the redevelopment works at the Loreto Normanhurst School: Stage 1, substage 4.
Audit Period	The IEA period will be between 28 February and 14 July 2026 to with respect to the IEA criteria. Any activity or evidence that is not within this IEA period will not be included in the scope of the IEA (with the exception of assessing the status of the actions identified in the previous audit).
Audit objective	• Assess whether the site is operated in compliance with the approval conditions listed under Schedule 3 of the State Significant Development consent (SSD 8996): • Assess whether the site is being operated in accordance with current practice and standards • Assess the overall environmental performance of the site and effects on the surrounding environment and sensitive receptors • Review the adequacy and implementation of procedures and management plans developed in accordance with the approval conditions • Provide recommendations for the overall improvement of environmental performance of the site
Audit criteria	The audit criteria for the site will be as follows: • Conditions of the SSD 8996 • Commitments within the CTPG Loreto Normanhurst Construction Environmental Management Plan (CEMP) and the following sub-plans: - Community Consultation Plan (CCP) - Construction Pedestrian and Traffic Management Plan (PTMP) - Construction Noise and Vibration Management Plan (NVMP) - Construction Soil and Water Management Plan (SWMP) - Construction Waste Management Sub-plan (WMP)
Audit method	In accordance with the: *Independent Audit Post Approval Requirements (May 2020):* **Document Review** With regards to the works being undertaken at the site, documentation will be reviewed against the standard to identify actual or potential non-conformances or opportunities for improvement. **Conduct an Opening Meeting** This meeting conducted at the start of the audit. **Undertake Interviews**

<table>
<tr><th>Agenda item</th><th>Notes</th></tr>
<tr><td></td><td>Interviews will be undertaken with relevant personnel both online and onsite (as required). Objective evidence will be requested to confirm conformance or compliance.

Site Inspection
Photographs and measurements (where appropriate) will be taken of items of interest or items requiring corrective action. If any items of non-compliance/conformance are identified, they will be raised with CTPG and noted in the report. If an item which poses immediate environmental harm or is causing immediate environmental harm is identified, CTPG will be notified immediately.

Conduct the Closing Meeting
A closing meeting will be conducted with CTPG at the end of the audit. It will provide opportunity for Epic to outline compliant and non-compliant findings identified during the audit, CTPG to respond or clarify any findings, and the auditor to confirm the process following the audit. Meeting minutes and attendance records will be maintained by Epic following the meeting.

Audit Reporting
The findings of the document review and interviews will be assessed, and each finding assigned a rating. Once the findings are assessed and rated, an audit report will be prepared.

Matters Related to Confidentiality
All information supplied, sighted, and disclosed as part of this audit will remain confidential. Results of the audit will only be provided to CTPG.</td></tr>
<tr><td>Audit scoring</td><td>The scoring assessment ratings will be as follows:
• Compliant: The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the condition or management plan requirement have been complied/conformed with within the scope of the audit
• Non-compliant: The auditor has determined that one or more specific elements of the conditions or management plan requirements have not been complied with within the scope of the audit
• Not triggered: A condition or requirement has an activation or timing trigger that has not been met during the defined audit period (may be a retrospective or future requirement), therefore an assessment of compliance/conformance is not relevant</td></tr>
<tr><td>Audit schedule</td><td>
<table>
<tr><th>Proposed Date</th><th>Task / Description</th><th>Location</th><th>Responsibility</th></tr>
<tr><td colspan="4">Phase I - Project Preparations</td></tr>
<tr><td>3/03/2026</td><td>Provision of management plans required for the IEA</td><td>Email</td><td>CTPG</td></tr>
<tr><td></td><td>Preparation and provision of IEA Plan to CTPG</td><td>Email</td><td>Epic</td></tr>
<tr><td></td><td>Undertake a preliminary document review</td><td>Epic Offices</td><td>Epic</td></tr>
<tr><td></td><td>Develop the IEA tools</td><td>Epic Offices</td><td>Epic</td></tr>
<tr><td colspan="4">Phase II - IEA</td></tr>
<tr><td rowspan="3">03/03/2026</td><td>Opening Meeting</td><td>Site</td><td>All</td></tr>
<tr><td>Site inspection</td><td>Site</td><td>Epic</td></tr>
<tr><td>IEA Interviews</td><td>Site</td><td>Epic & CTPG</td></tr>
<tr><td></td><td>IEA Interviews and evidence collation (additional time allocated if required)</td><td>Teleconference</td><td>Epic & CTPG</td></tr>
<tr><td></td><td>Closing Meeting</td><td>Site</td><td>All</td></tr>
<tr><td colspan="4">Phase III – IEA Reporting</td></tr>
<tr><td></td><td>Provision of additional evidence not obtained during the IEA</td><td>Email</td><td>CTPG</td></tr>
<tr><td></td><td>Prepare the draft IEA report</td><td>Epic Offices</td><td>Epic</td></tr>
<tr><td></td><td>Issue the draft IEA report to CTPG</td><td>Email</td><td>Epic</td></tr>
<tr><td></td><td>CTPG provides comments on draft IEA report</td><td>Email</td><td>CTPG</td></tr>
<tr><td></td><td>Issue the final IEA report to CTPG</td><td>Email</td><td>Epic</td></tr>
</table>
</td></tr>
<tr><td>Closing Meeting</td><td>At the closing meeting, Epic will present preliminary findings, these may change as the final document review is completed.</td></tr>
</table>

Appendix E Independent Audit Findings

Conditions		July 2026 Audit			
Condition No.	Requirement (Exact Wording)	Compliance Rating	Evidence Reviewed	IEA Findings	Unique Identification
SCHEDULE 3 - CONDITIONS OF CONSENT FOR STAGE 1 WORKS					
Part A - Administrative Conditions					
Obligation to Minimise Harm to the Environment					
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and, if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development.	C	1. Site Inspection 2. Audit interviews	Based on the site inspection, audit interviews and evidence provided, it was determined the the project was generally in compliance with the this requirement during the audit period. Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4.	
Terms of Consent					
A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS, except where superseded by the RtS, SRtS, and SSD-8996-MOD-1; and SSD-8996-Mod-2 (d) in accordance with the approved plans in the table below (as may be amended by the conditions in Schedule 3 Part A):	C	1. Site Inspection 2. Audit interviews	It was determined that the development of this project is generally in compliance with the this requirement	
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; (b) any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and (c) the implementation of any actions or measures contained in any such document referred to in (a) above.	NC	1. Letter correspondence from DPHI dated 3/08/2026 2. https://www.loretonh.nsw.edu.au/about/master-plan/community-engagement/	The letter dated 3 August 2026 stated that the previous IEA (27/08/25 - 27/02/26) was considered to generally satisfy the reporting requirements of the Consent and the IA PAR. The letter also requested the following items for future IEAs: 1. Site inspection to be conducted during the audit period in accordance with the IA PAR . - the site inspection for this IEA was undertaken in accordance with the IA PAR 2. The IEA report and RAR be published on the project website. - A copy of the report was confirmed as being published on the project website, **however section 4.3.2 of the IA PAR specifically requires the proponent to submit their response to the audit recommendations to the Department in a document separate to the final IEA report.** 3. A status update for all actions in the RAR be reported in the next IEA until all actions complete. - This IEA includes a review of the status of the recommendations made in the previous IEA report. 4. Following submission of the IEA report a review (and update if necessary) of strategies, plans, programs required under this consent be completed. - Document review /updates did not occur, however it is important to note that at the time of this audit, construction was complete and only minor defects work was being undertaken.	**NC-01**
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in Schedule 3 condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in Schedule 3 condition A2(c) and A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	NT	NA	This condition is provided for clarification and is not an auditable matter.	
Limits of Consent					
A5	This consent lapses five years after the date of consent unless work is physically commenced within the meaning of section 4.53(4) of the EP&A Act.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with this condition occurred outside of this audit period: - Construction for stage 1 substages 1 - 3 are complete (commenced within 5 years of the consent date). - Notification for the commencement of construction for substage 4 was submitted to the Department as required under condition A29.	
Student and Staff Numbers					
A6	A maximum school population of 1650 students (500 additional students) and 290 (36 additional) staff are permitted at the school at any one time as part of Stage 1 works.	C	1. Audit interviews. 2. Loreto New Boarding House-Environmental Audit-Student Numbers- Email correspondence (Loreto, 10/08/2026)	Email correspondence from the Loreto Normanhurst Director of Business Services confirmed compliance with the requirements of this condition. Based on the February census, student and Staff numbers are: - Total number of students: 1238 - Total number of staff: 247	
A7	A maximum of 216 students (enrolled at the school) are permitted as boarders within the Boarding Accommodation at any one time as part of the Stage 1 works.	C	1. Audit interviews. 2. Loreto New Boarding House-Environmental Audit-Student Numbers- Email correspondence (Loreto, 10/08/2026)	Email correspondence from the Loreto Normanhurst Director of Business Services confirmed compliance with the requirements of this condition. Based on the February census: - Total number of boarders: 197	
A8	Notwithstanding Schedule 2 condition A6: (a) the increase in student and staff population must be staged in accordance with the specified maximum population listed for each substage in the amended staging plan required by Schedule 3 condition B1; (b) no increase in student numbers is permitted unless the five additional drop-off/pick-up spaces, the through site road and two additional bus bays are constructed and operational on the site; and (c) the sequential increase in the student and staff population for the relevant substage must only occur once evidence is provided to the satisfaction of the Certifier demonstrating that the specified transport infrastructure for the relevant substage has been completed in accordance with the amended staging plan required by Schedule 3 condition B1.	C	1. Audit interviews. 2. Loreto New Boarding House-Environmental Audit-Student Numbers- Email correspondence (Loreto, 10/08/2026)	Compliance with this condition for substages 1-3 (now complete) have previously been confirmed. Substage 4 (subject to this audit period): a) Evidence provided by the Director of Business Services confirmed that - Current student numbers are 1238 (Maximum allowed students is 1250) - Current staff numbers are 247 (Maximum allowed staff numbers is 254) b) and c) compliance previously confirmed as part of Substages 1-3	
Staging					
A9	The project may be constructed and operated in stages. Where compliance with conditions is required to be staged due to staged construction or operation, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the satisfaction of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 05, dated 31 May 2024. 2. Revised Staging Report Approval Letter signed 20/06/2024 (DPHI).	No changes to the current staging report (Rev 05) occurred within the audit period. Compliance with the requirements of this condition was confirmed in March 2026 audit.	

A10	A Staging Report prepared in accordance with Schedule 3 condition A9 must: (a) be generally consistent with the construction staging plan detailed in 'Loreto Normanhurst School Redevelopment (Concept and Stage 1 DA) – SSD 8996 Staging Plan', prepared by Ethos Urban and dated 19 May 2021 as amended by Schedule 3 conditions A2 and B1; (b) demonstrate that the student / staff number increase, car parking numbers, pick-up / drop-off facilities would be provided in accordance with the approved staging plan, as amended by Schedule 3 conditions A2 and B1; (c) demonstrate the four existing pick-up/drop-off spaces next to the Gonzaga Barry building and accessed from Osborn Road would not be removed and would remain in operation until the five new pick-up/drop-off spaces and associated infrastructure have been constructed and are operational; (d) set out how the construction of the whole of Stage 1 will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; (e) set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant); (f) specify how compliance with conditions will be achieved across and between each of the stages of the project; and (g) set out mechanisms for managing any cumulative impacts arising from the proposed staging.	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 05, dated 31 May 2024. 2. Revised Staging Report Approval Letter signed 20/06/2024 (DPHI).	No changes to the current staging report (Rev 05) occurred within the audit period. Compliance with the requirements of this condition was confirmed in March 2026 audit.	
A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 05, dated 31 May 2024. 2. Revised Staging Report Approval Letter signed 20/06/2024 (DPHI).	No changes to the current staging report (Rev 05) occurred within the audit period. Compliance with the requirements of this condition was confirmed in March 2026 audit.	
A12	Where construction or operation is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report.	C	1. Site inspection 2. Audit interviews	A site inspection undertaken 14 July 2026 which confirmed that the only works occurring on site were related to Substage 4. It is noted that construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed. No other works were associated with Substages 5 and 6 were identified as having commenced	
Staging, Combining and Updating Strategies, Plans or Programs					
A13	The Applicant may: (a) prepare and submit any strategy, plan (including management plan, architectural or design plan) or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan (including management plan, architectural or design plan) or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan (including management plan, architectural or design plan) or program); (b) combine any strategy, plan (including management plan, architectural or design plan), or program required by this consent (if a clear relationship is demonstrated between the strategies, plans (including management plan, architectural or design plan) or programs that are proposed to be combined); and (c) update any strategy, plan (including management plan, architectural or design plan), or program required by this consent (to ensure the strategies, plans (including management plan, architectural or design plan), or programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).	C	1. SSD-MOD 2 Notice of Decision (12/03/2026) 2. Loreto Normanhurst School Redevelopment - Modification 2 Assessment Report (DPH&I, March 2026)	Evidence provided in the March 2026 audit confirmed compliance with the requirements of this condition. MOD 2 to SSD8996 was approved by the Department (decision date 12/037/2026) to make minor changes to architectural drawings and the following conditions: - A42 Annual Reporting for Substage 6 Transport Infrastructure (Note: Substage 6 is outside of this audit period) - B1 Substages (Note: changes to transport infrastructure for future substages not relevant to this audit period) - B18 additional bicycle parking spaces for substage 6 (not applicable to his audit period) - E10 Green Travel Plan	
A14	Any strategy, plan or program prepared in accordance with condition A13, where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary	C	1. SSD-MOD 2 Notice of Decision (12/03/2026) 2. Loreto Normanhurst School Redevelopment - Modification 2 Assessment Report (DPH&I, March 2026)	Evidence provided in the March 2026 audit confirmed compliance with the requirements of this condition. MOD 2 to SSD8996 was approved by the Department (decision date 12/037/2026) to make minor changes to architectural drawings and the following conditions: - A42 Annual Reporting for Substage 6 Transport Infrastructure (Note: Substage 6 is outside of this audit period) - B1 Substages (Note: changes to transport infrastructure for future substages not relevant to this audit period) - B18 additional bicycle parking spaces for substage 6 (not applicable to his audit period) - E10 Green Travel Plan	
A15	If the Planning Secretary agrees, a strategy, plan (including management plan, architectural or design plan), or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	NT	NA	This condition provides permissions to the applicant and is not auditable.	
A16	Updated strategies, plans (including management plan, architectural or design plan), or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan, program or drawing.	C	1. Construction Environmental Management Plan Rev 05, (Buildcorp, 08/09/2025) 2.Construction Soil and Water Management Plan Rev 2 (TWW, 26/03/2025) 3. Construction Traffic and Pedestrian Management Sub-Plan Rev4 (pdc consultants , 10/07/2024) 4. Construction Noise & Vibration Management Plan (CNVMP) Rev D (RWDI, 22/10/2024) 5.HSE Emergency Procedures Plan Rev3 (Buildcorp, 24/07/2024) 6. Audit interviews	Construction works were complete at the time of this IEA. Management plans developed for Substage 4 included: - Construction Environmental Management Plan (CEMP) - Construction Soil and Water Management Plan (CSMP) - Construction Traffic and Pedestrian Management Sub-Plan - Construction Noise and Vibration Management Plan (CNVMP) - Construction Waste Management Plan (CWMP) - HSE Site Emergency Procedures Plan No changes to these plans were made during the audit period.	
Prescribed Conditions					
A17	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	NT	NA	No prescribed conditions have been applied under the EP&A Regulation.	
Planning Secretary as Moderator					
A18	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution , to the extent to which the Planning Secretary has power under the EP&A Act.	NT	NA	The condition is provided for clarification and is not an auditable matter.	

Evidence of Consultation					
A19	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document for information or approval; and (b) provide details of the consultation undertaken including: (i) the outcome of that consultation, matters resolved and unresolved; and (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	C	1. Multiple Post construction dilapidation Reports (LCG) - Residential properties - Mt Pleasant Ave, 33, 35, 37, 39, 41, 45, 47 (LCG, 24/02/2026) 2. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	Such consultation is required under sub-clauses C5(a) (Pre-Construction Dilapidation Survey Report), C5(a) (Pre-Construction Dilapidation Survey Report), C16(b) (Construction Pedestrian and Traffic Management Plan). Compliance with the requirements of this condition was determined in the March 2026 audit and C18(a) (Construction Soil and Water Management Plan). The Auditee confirmed that no additional dilapidation surveys were required for the substage 4 construction works. Post construction dilapidation reports were completed for seven residential properties on Mt Pleasant Ave and were provided to the certifier for review as part of the occupation certificate	
Structural Adequacy					
A20	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. **Note:** Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	Evidence provided as part of previous audits confirmed: The assessment report for the boarding house was undertaken against the "Deemed-to-satisfy" provisions of the relevant sections of the BCA and applicable building regulations. The assessment confirmed that the design is capable of complying subject to resolution of the identified areas of non-compliance and compliance with the recommendations provided within the report. The Occupation certificate provided for substage 4 includes a list of all relevant BCA standards and associated safety measures installed to address these. The occupation certificate provided was a partial certificate for the completed construction of a new boarding house, excluding external footpaths, stairs, retaining structures and landscaping in the northern portion of the building, and excluding a hearing augmentation system.	
External Walls and Cladding					
A21	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026).	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance for external walls against the relevant requirements of the BCA : 74: External wall disclosure statement (Dunrite Linings, 20/03/2026) 75: External wall disclosure statement (Façade Concept NSW Pty Ltd 26/03/2026) 79: Waterproofing Installation certificate - External areas (Danlaid CFS Pty Ltd 09/04/2026)	
Design and Construction for Bush Fire and Emergency Vehicle Access					
A22	Water, electricity and gas must comply with sections 4.1.3 and 4.2.7 of *Planning for Bush Fire Protection 2006* (or any other updated version).	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026). 2. Compliance Statement (Bushfire hazard Solutions, 4/06/2026).	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: 64: Bushfire Compliance Statement (Bushfire Hazard Solutions Pty Ltd 04/06/2026) which confirmed design and construction compliance with the SSD conditions A22 - A25, B24 and E14. 92: Bushfire Emergency Management& Evacuation Plan (Bushfire Hazard Solutions Pty Ltd, 02/04/2026) 163: Bushfire Construction Comment (Bushfire Hazard Solutions Pty Ltd 14/06/2026) BCA performance solution reports included fire engineering reports / documents addressing the relevant BCA provisions	
A23	Landscaping to the site must comply with the principles of Appendix 5 of *Planning for Bush Fire Protection 2006* (or any other updated version) and must ensure that the compliance with this provision does not result in removal of additional trees apart from that permitted by this development consent.	C	1. Bushfire Protection Assessment, Loreto Normanhurst - Stage 1 Works and Master Plan. 2. Compliance Statement (Bushfire hazard Solutions, 4/06/2026). 3. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	A bushfire protection assessment for stage 1 of the proposed development was undertaken by Eco Logical. The assessment identified that the proposed works for stage 1 were located outside of the vegetation buffer for bushfire prone land. Bushfire Hazard Solutions reviewed the relevant plans and confirmed that delivery of the Landscape Plan prepared by Context Landscape Design Pty Ltd, Project No. 22551, Softworks Plan 01 – 05, Issue C, dated 07/02/2024, External Services Plan, Project No 7689, Drawing NoH-0001, Revision 1, Date Jan 2024 and Electrical Services Site Plan, Drawing Number 7498-ES-103, Issue Number B, Date 02.02.24 can achieve compliance with the aforementioned conditions. The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition outlining applicable documentation regarding landscaping compliance and a bushfire compliance statement. The Bushfire Compliance Statement confirmed design and construction compliance with the SSD conditions A22 - A25, B24 and E14.	
A24	A Bush Fire Emergency Management and Evacuation Plan must be prepared consistent with 'Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan December 2014'.	C	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026) 2. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026) 3. Compliance Statement (Bushfire hazard Solutions, 4/06/2026).	The March 2026 audit confirmed compliance with the requirements of this condition: A bushfire protection assessment for stage 1 of the proposed development was undertaken by Eco Logical. The assessment identified that the proposed works for stage 1 were located outside of the vegetation buffer for bushfire prone land. An email from Eco Logical confirmed that bushfire protection measures for construction standards, access, gas, and multi- storey development require no bushfire response to be addressed given the proposed development is greater that 100 m from the bushfire hazard. The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: 92: Bushfire Emergency Management& Evacuation Plan (Bushfire Hazard Solutions Pty Ltd, 02/04/2026)	
A25	Emergency vehicle access must continue to be provided onto the sports fields from Mount Pleasant Avenue and/or Osborn Road.	C	1. Site inspection 2. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026) 3. Compliance Statement (Bushfire hazard Solutions, 4/06/2026).	Entrance to sports field was clear at time of inspection and 'no parking' signage in place. Driveway access to sports field observed to be clear at the time of the inspection. Traffic controllers in place to ensure there were no access restriction relating to project vehicles. The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: 94. Letter confirming Emergency Vehicle access continues to be provided on the Sports Fields (Loreto Normanhurst 02/03/2026) The Bushfire Compliance Statement confirmed design and construction compliance with the SSD conditions A22 - A25, B24 and E14.	
Applicability of Guidelines					

A26	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	NT	NA	The condition is provided for clarification and is not an auditable matter.	
A27	Consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	NT	1. Audit interviews	The Auditee confirmed the no such direction had been received from the Planning Secretary during the audit period.	
Monitoring and Environmental Audits					
A28	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, noncompliance notification, Site audit report and independent auditing. **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.	NT	NA	The condition is provided for clarification and is not an auditable matter.	
Access to Information					
A29	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in Schedule 3 condition A2 of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent; (v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint; (viii) a complaints register, updated monthly; (ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report; (x) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary, and publicly available for 12 months after the commencement of operations.	C	1.Letter correspondence - request to cease Operational Compliance Reporting or substages 1-3 2. https://www.loretonh.nsw.edu.au/about/master-plan/	A review of the Applicant's website confirmed compliance with the requirements of this condition for items (a)(i) to (a)(x). The following information was not triggered at the time of the IEA: (v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs b) The Applicant has advised that the required information will remain on the website as required by this condition.	
Compliance					
A30	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	C	1. Site Induction (Buildcorp, 18/11/2024)	Employees, contractors (and their sub-contractors) are required to complete a site induction which includes relevant aspects of the conditions of this consent relevant to activities they carry out in respect of the development for substage 4. A copy of the site induction was provided as evidence.	
Incident Notification, Reporting and Response					
A31	The Planning Secretary must be notified through the major projects portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.	C	1. Audit interviews 2.Complaints and Incidents Register	The Auditee confirmed that no reportable incidents had occurred within the audit period. A review of the complaints and incidents register provided identified that no incidents had been reported to the Department as required by this condition, nor had any complaints been received from the public within the audit period	
A32	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.	NT	1. Audit interviews 2.Complaints and Incidents Register	No reportable incidents occurred within the audit period as outlined in the findings for condition A31	
Non-Compliance Notification					
A33	Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing and must be submitted via the Department's Major Projects Website.	C	1. Audit interviews 2.Complaints and Incidents Register	No reportable incidents occurred within the audit period as outlined in the findings for condition A31	
A34	The notification must identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance	C	1. Audit interviews 2.Complaints and Incidents Register	No reportable incidents occurred within the audit period as outlined in the findings for condition A31	
A35	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	NT	NA	Condition clarifies reporting requirements	
Revision of Strategies, Plans and Programs					
A36	Within three months of: (a) the submission of a compliance report under Schedule 3 condition A38; (b) the submission of an incident report under Schedule 3 condition A32; (c) the submission of an Independent Audit under Schedule 3 condition D37; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under Schedule 3 condition A2 which requires a review the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	NC	1.Audit interviews	Recommendations made in the previous IEA related to the review and /or update of documents/management plans etc, did not occur, however, construction was complete and only minor defects work was being undertaken at the time of this audit	**NC-02**

A37	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) within six weeks of the review. **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.	C	1. Audit interviews 2. Loreto Normanhurst School Redevelopment - Modification 2 (DPHI, March 2026) 3. Modification of Development Consent (12/03/2026) 4. Notice of decision (12/03/2026). 5. Stamped Plans	Mod 2 was submitted and approved by the Department for Stage 1 to change building and roof RLs, carparking to be delivered over seven stages instead of the original five, changes in student and staff numbers for substages five and six (noting no overall number changes), increase in bicycle parking numbers. The Department identified that the changes were consistent with Government strategies, plans and policies.	
Compliance Reporting					
A38	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).	NC	1.Request to cease Operational Compliance reporting for Substages 1-3 Approval (DPHI, 6/05/2026) 2. Email Correspondence: Exemption from Operation Compliance reports - Substages 1-3 (DPHI, 6/05/2025)	The annual Operation Compliance Report for substages 1 - 3 (2025) remains outstanding. A letter form the Department in March 2026 approved the cessation of ongoing annual Operational Compliance Reporting for for Sub-stages 1 to 3. This approval did not include any detail to state that the outstanding 2025 report was no longer required. Therefore, compliance with this condition for substages 1 - 3 has not been met and the 2025 report remains outstanding. It is noted that the approval to cease compliance reporting does not include substage 4 (subject to this audit) and annual compliance reports for substage 4 will still be required in accordance with the Compliance Reporting Post Approval Requirements (2020).	**NC-03+J240**
A39	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.	NC	1.Request to cease Operational Compliance reporting for Substages 1-3 Approval (DPHI, 6/05/2026) 2. Email Correspondence: Exemption from Operation Compliance reports - Substages 1-3 (DPHI, 6/05/2025)	Section 2.1 Table 1 of the Compliance Reporting PAR, 2026 sets out the phase, timing and minimum frequency for compliance reporting. Operational compliance reports are required on an annual basis (at a minimum). An annual Operations Compliance Report was not completed for 2025 (substages 1-3) and remains outstanding.	
A40	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	NC	1. https://www.loretonh.nsw.edu.au/about/master-plan/ 2. Compliance Reporting Post Approval Requirements (Department of Planning, Housing and Infrastructure, March 2026)	Previous Operations Compliance Report dated 7/03/2024 was confirmed as being available on the Applicants website. An annual Operations Compliance Report was not completed for 2025 and remains outstanding and therefore has not been made available on the website within the specified timeframe	
A41	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.	C	1.Request to cease Operational Compliance reporting for Substages 1-3 Approval (DPHI, 6/05/2026) 2. Email Correspondence: Exemption from Operation Compliance reports - Substages 1-3 (DPHI, 6/05/2025) 3. https://www.loretonh.nsw.edu.au/about/master-plan/	Evidence was provided confirming that the Department agreed to and approved the cessation of ongoing annual Operational Compliance Reporting for for Sub-stages 1 to 3 via letter and email. It is noted that this approval does not include substage 4 (subject to this audit) and annual compliance reports for substage 4 will still be required in accordance with the Compliance Reporting Post Approval Requirements (2020).	
Annual Reporting on Substage 6 Transport Infrastructure					
A42	Within seven years of the date of issue of the Occupation Certificate for Substage 5 works permitted in Schedule 3 Condition B1, if the transport infrastructure works and minimum parking provisions required in Substage 6 under Schedule 3 Condition B1 have not been fully delivered, the Applicant must: (a) prepare and submit ongoing annual reports to the satisfaction of the Planning Secretary; (b) include in the annual report, at minimum, the following information: (i) evidence of continued ongoing commitment to the progression of the Substage 6 works under Schedule 3 Condition B1; (ii) the current status of planning, design, any relevant approvals and delivery of the Substage 6 works; (iii) the anticipated commencement date for Substage 6 physical works (as calendar year and relevant quarter) or the evidence of commencement; (iv) the anticipated completion date for the Substage 6 works (by calendar year and relevant quarter); and (v) any identified barriers to delivery of the Substage 6 parking provisions. (c) submit ongoing annual reports as detailed in Schedule 3 Condition A42(b), no more than every 12 months from the date of the initial report until the Substage 6 works have been fully delivered and are operational.	NT	1. Notice of Decision - Loreto Normanhurst School Redevelopment - Modification 2 (12/03/2026) 2.Modification of Development Consent (12/03/2026) 3. Consolidated Consent - Development Consent (21/10/2021)	This is a new condition introduced as part of the MOD 2 approval and is related to a future substage. Compliance against the requirements of this condition will be assessed din future independent audit reports.	
PART B PRIOR TO THE ISSUE OF A CONSTRUCTION CERTIFICATE					
Amendments to staging of student and staff increases and transport infrastructure facilities					
B1	Prior to the issue of any construction certificate in relation to Stage 1, a revised staging plan must be prepared and submitted to the satisfaction of the Planning Secretary. The revised staging plan must incorporate all substages, associated maximum permitted student and staff numbers and the required transport infrastructure as listed in the table below:	C	1. Loreto Normanhurst SSD8996 Staging Report Rev 05, dated 31 May 2024. 2.Revised Staging Report Approval Letter signed 20/06/2024 (DPHI).	No changes to the previously approved staging report occurred within the audit period. The Staging Report Rev 05, dated 31/05/2024 was approved by DPHI (letter dated 20/06/2024) Section 1.2 of the Staging Report identifies: - Stage 1 substages 1 - 3 are complete - Stage 1 substage 4 is the current stage - Stage 1 substages 5 - 6 are yet to commence.	
Design Amendments					

B2	Prior to the issue of any construction certificate for Stage 1, the approved architectural and landscape plans listed in Schedule 3 condition A2 relating to the boarding accommodation building must be amended to incorporate the following changes to the design of the boarding accommodation building to the satisfaction of the Planning Secretary: *(a) Deleted by SSD-8996-MOD-1.* *(b) Deleted by SSD-8996-MOD-1.* *(c) Deleted by SSD-8996-MOD-1.* (d) the design of the basement, including ceiling clearance and turning circle, must be redesigned to enable a waste collection vehicle to enter and exit the basement in a forward direction; and *(e) Deleted by SSD-8996-MOD-1.* *(f) Deleted by SSD-8996-MOD-1.* (g) the existing trees identified as T362 and T363 on Landscape Drawing, Tree Protection & Removal Plan, Drawing No. L_100, Revision H, prepared by Context and dated 14.03.24, must be retained through alternative design of the driveway to the south of the boarding accommodation building and additional tree protection measures.	C	1.Revised Staging Report Approval Letter signed 20/06/2024 (DPH&I).	Compliance with the requirement of this condition was confirmed in a previous audit period. Substage 4 was approved by the DPH&I dated 20/06/2024 No changes to the staging plan in relation to the items specified in this condition occurred within the audit period.	
B3	Prior to the issue of any construction certificate for Stage 1, the approved architectural and landscape plans listed in Schedule 3 condition A2 relating to the P3A Osborn Road carpark must be amended to incorporate the following changes to the design of the P3A Osborn Road carpark to the satisfaction of the Planning Secretary: (a) existing tree nos. T413 to T420 and T472 as identified on the landscape plans must be retained; (b) the tandem car parking spaces from the western (Osborn Road) side to the eastern (oval side) of the carpark must be relocated or the carpark redesigned in another manner which results in the retention of the trees listed in (a) above as may be agreed to by the Planning Secretary.	NT	1. Substage 4 Landscape plans marked up (AJ&C, 8/12/2020) 2. Landscape plans (Arcadia 5/11/2021) 3. Approval Letter - conditions B2, B3, B4, B5, B18 and D20 (DPE, 15/12/2021) 4. Site inspection	Compliance with the requirement of this condition was confirmed in a previous audit period. Substage 4 was approved by the DPH&I dated 15/12/2021. Bservatiosn made during the site inspection confirmed that the retained trees were still present.	
Electrical Substation					
B4	Prior to the issue of any construction certificate for Stage 1, the Applicant must submit detailed plans of the electrical stand-alone substation to the satisfaction of the Planning Secretary. The plans must: (a) demonstrate that service connections, cabling or associated works would not be located within Tree Protection Zone or Structural Root Zone of any existing trees; (b) confirm appropriate tree protection measures to be implemented during construction (if required); (c) demonstrate that the substation front is accessed from the existing Primary School car park driveway and does not include a new separate driveway connected to Mount Pleasant Avenue; and (d) include details of landscaping around the substation to visually screen / reduce the visibility of the structure from Mount Pleasant Avenue.	C	1. Site inspection	Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4.	
Landscape Plans					
B5	Prior to the issue of any construction certificate for Stage 1, the Applicant must prepare updated Landscape Plans, to the satisfaction of the Planning Secretary. The Landscape Plans must: (a) incorporate the design amendments in Schedule 3 conditions B2, B3 and B4; (b) confirm the resulting tree canopy site coverage is no less than 42% of the site area (13.17 hectares); (c) detail the location, species, maturity and height at maturity of plants to be planted on-site; (d) include a majority of plants (trees, shrubs and groundcovers) endemic to the local area from the Blue Gum High Forest (BGHF) native vegetation community; (e) include details to confirm that all trees to be planted on site will be advanced stock in containers of 200 litres or greater; (f) include detailed design to demonstrate that the front setback of the boarding accommodation building (facing Mount Pleasant Avenue) includes canopy trees and minimal hard surfaces; (g) include the provision of any nest boxes required by Schedule 3 condition D20; and (h) comply with the principles of Appendix 5 of Planning for Bush Fire Protection 2006 (or any other updated version). (i) provide for the planting of 105 new trees; (j) demonstrate sufficient space is provided to allow the replacement trees to grow to maturity; (k) confirm early commencement of the sourcing of replacement planting as soon as feasible; (l) detail that seeds from native plants to be removed are collected and used in the landscape area; (m) confirm the retention of Trees No. 195, 227, 321, 323, 324, 328, 331, 335, 336, 337, 362, and 363, as identified on the Landscape Drawing, Tree Protection & Removal Plan, Drawing No. L_100, Tree Protection & Removal Plan, Revision H, prepared by Context Landscape Architecture and dated 14.03.24; (n) include details that the native trees to be removed from the site are to be salvaged, including root balls, tree hollows and tree trunks (greater than 25cm in diameter and 3m in length), and used to enhance habitat at the site and the remnant bushland within the southern section of the site; and (o) if the removed native trees are not able to be entirely reused within the site, evidence of consultation with local community restoration and rehabilitation groups, Landcare groups, and relevant public authorities, local councils, and Greater Sydney Local Land Services to determine if the removed trees can be reused in habitat enhancement and rehabilitation work prior to pursuing other disposal options.	C	1. Site inspection	No changes to the approved landscape planting design and specifications were identified during the audit period. Observation made during the site inspection confirmed that landscaping appeared to be in accordance with approved plans.	
External Walls and Cladding					
B6	Prior to the issue of a construction certificate for the boarding accommodation building, the Applicant must submit to the satisfaction of the Certifier evidence the staff apartments would be constructed in accordance with the BASIX Certificate no. 1362224M_04 commitments. The BASIX Certificate must be submitted to the Certifier with all commitments clearly how on the Construction Certificate plans. An updated certificate must be issued if relevant design amendments are made.	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026). 2. Section J1V3 and BASIX OC letter (Engineering Lab NSW Pty Ltd, 30/06/2026) 2. BASIX Compliance Report - BASIX Affected Dwelling Rev 4 (E-LAB Consulting, 4/07/2024).	The statement provided by for Engineering Labs confirmed that the constructed works of Loreto Normanhurst New Boarding House complies with: - S section J requirements outlined within the Section J Part J1 JV3 Compliance report dated 01/07/2024 - BASIX requirements outlined within the BASIX Compliance Report dated 04/07/2024. A final BASIX certificate will be issued at the completion of al occupation certificates for the project.	
BASIX					

B7	Prior to the issue of a construction certificate for the boarding accommodation building, the Applicant must submit to the satisfaction of the Certifier evidence the staff apartments would be constructed in accordance with the BASIX Certificate no. 1194482M commitments. The BASIX Certificate must be submitted to the Certifier with all commitments clearly shown on the Construction Certificate plans. An updated certificate must be issued if relevant design amendments are made.	NT	1.SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026) 2. BASIX Compliance Report Rev 4 (E-LAB Consulting, 09/02/2024). 3. https://www.planningportal.nsw.gov.au/major-projects/projects/loreto-normanhurst-school-redevelopment-modification-1	Compliance with the requirements of this condition was confirmed prior to this audit period. The BASIX Certificate (1362224M-04) for the boarding house has been published on the Planning Portal. A final BASIX certificate will be issued at the completion of al occupation certificates for the project.	
Stormwater Management					
B8	Prior to the issue of the relevant construction certificate that involves stormwater works, the Applicant must provide detailed design plans for an operational stormwater management system for that stage of the development, to the Certifier for approval. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the SRtS as listed in the table below (as amended by the conditions of this consent where applicable): (c) be in accordance with applicable Australian Standards; (d) include details of the on-site detention system and water sensitive urban design measures as required by the conditions of this development consent; (e) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff(Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines; and (f) be designed for an average recurrence interval (ARI) of 20 years and be gravity drained and connected to an existing Council piped drainage system.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026) 2. Construction Drawings Rev 3 (TTW,12/07/2024) 3. CC1-WSUD Peer review (Warren Smith Consulting Engineers, 6/08/2024) 4. Sydney Water Subdivider/Developer Compliance Certificate 19/03/2025	Compliance with the requirements of this condition was confirmed prior to this audit period. Construction Drawings Rev 3 (12/07/2024) developed by TTW include detailed design of stormwater system that has been peer reviewed (Warren Smith Consulting Engineers, 6/08/2024.	
B9	Prior to the issue of the relevant construction certificate, the Applicant must design an on-site stormwater detention system for the development and submit it to the Certifier for approval. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) have a capacity of not less than 115 cubic metres (m3), and a maximum discharge (when full) of 114 m3 per second; (c) have a surcharge/inspection grate located directly above the outlet; (d) ensure the discharge from the detention system is controlled via 1 metre (m) length of pipe, not less than 150mm diameter or via a stainless plate with sharply drilled orifice bolted over the face of the outlet discharging into a larger diameter pipe capable of carrying the design flow to an approved / existing Council drainage system; and (e) ensure that where above ground and the average depth is greater than 0.3m, a 'pool type' safety fence and warning signs are installed.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition was confirmed prior to this audit period.	
B10	Prior to the issue of the relevant construction certificate that involves stormwater works that would result in any change to existing stormwater drainage on Pennant Hills Road, detailed design plans and hydraulic calculations of the stormwater drainage system must be submitted to and be endorsed by TfNSW. Evidence of such endorsement must be provided to the Certifier prior to the issue of the construction certificate for those stormwater management works.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition was confirmed prior to this audit period - Sub-stage 4 works do not impact stormwater drainage to Pennant Hills Road.	
B11	Prior to the issue of the relevant construction certificate, a Water Sensitive Urban Design (WSUD) Strategy must be submitted to the Certifier for approval. The WSUD Strategy must: (a) be prepared by a suitably qualified and experienced person(s); (b) be peer-reviewed and certified by a qualified hydraulic engineer; (c) include the recommended water quality devices and targets contained within the Civil Engineering Report and plans prepared by Taylor Whitting Consulting Engineers, dated 17 December 2020, including (but not limited to): (i) 1 00kL rainwater tank; (ii) vegetated swale/s; (iii) gully pit insert/ baskets designed to capture pollution prior to it running into stormwater drains; and (iv) storm filter cartridges or equivalent; (d) comply with the water quality targets set out in the Hornsby Development Control Plan 2013;and (e) be supported by a MUSIC model.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition was confirmed during a previous audit period - A WSUD strategy had been developed and submitted to the certifier.	
Operational Noise - Design of Mechanical Plant, Equipment and School Bell / PA System					
B12	Prior to the issue of the relevant construction certificate for the design of mechanical plant/ equipment and school bell/ PA system, the Applicant must incorporate appropriate noise mitigation measures into the detailed design drawings. The Certifier must verify that all noise mitigation measures have been incorporated into the design to ensure the development will not exceed the recommended operational noise levels identified in the Construction and Operational Noise Assessment prepared by Wilkinson Murray and dated 16 December 2020.	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the requirements of this condition: Noise Mitigation Design Statement (Cowyn Building Group, 13/09/2022)	
Operational Waste Storage and Collection					
B13	Prior to the issue of the relevant construction certificate for the operational waste storage and collection areas, the Applicant must obtain agreement from Council for the design of the operational waste storage area (where waste removal will be undertaken by Council). Where waste removal will be undertaken by a private contractor, the design of the operational waste storage area must be in accordance with Council's standards. Evidence of the design and Council endorsement (where relevant) must be provided to the Certifier.	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	Compliance with the requirements of this condition was confirmed during previous audit periods. The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: - Operational Waste Management Plan (Property Development Solutions Aust Pty Ltd, 12/08/2024)	
Public Domain Works					
B14	Prior to the issue of the relevant construction certificate for footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifier that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from Council to the Certifier.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition were confirmed in a previous audit period.	

B15	Separate construction certificate applications under the provisions of section 138 of the *Roads Act 1993* must be submitted with the relevant road authority (Council/ TfNSW as relevant) for works within their land or public reserves including new vehicular crossings.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition were confirmed in a previous audit period.	
B16	Public domain works relating to Council property must be designed in accordance with AUSSPEC Specifications (www.hornsby.nsw.gov.au/property/build/aus-spec-terms-andconditions) and comply with the following requirements: (a) any damaged footpath, kerb, gutter and stormwater drainage pits and pipes as a result of the development must be reconstructed; (b) the land adjoining the footpath must be fully turfed; (c) any public utility adjustments must carried out at the cost of the applicant and to the requirements of the relevant public authority; (d) any damaged road pavement, as a result of the development, must be saw cut a minimum of 600 mm from the existing edge of the bitumen and reconstructed; and (e) the submission of a compaction certificate from a geotechnical engineer for any fill within road reserves, and all road sub-grade and road pavement materials.	C	1. Email correspondence - Damage to Council Assets (Hornsby Shire Council, 10/02/2026)	Email correspondence from Council confirmed that all reinstatement works to Council infrastructure was completed by Council Contractors.	
Operational Car Parking, Access, Drop-off/Pick-up and Service Vehicle Layout					
B17	Prior to the issue of the relevant construction certificate, evidence must be submitted to the satisfaction of the Certifier that the proposed access, parking and servicing arrangements comply with the following requirements: (a) adequate number of car spaces are provided in each substage in accordance with Schedule 3 condition B1; (b) amendments to the car parking layout are in accordance with Schedule 3 condition B3; (c) new and amended car parking spaces are designed in accordance with the latest versions of AS 2890.1 and AS 2890.6; (d) the basement access to the boarding accommodation building is designed to accommodate the turning path of a 6.5m medium rigid truck; (e) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the latest version of AS 2890.2; (f) design levels at the front boundary have been approved by Council; (g) the driveway pavement complies with AS 3727 and is a minimum 3m wide; (h) the pavement has a kerb to one side and a one-way cross fall with a minimum gradient of 2 percent and a lintel and pit provided at the low point; (i) retaining walls required to support the carriageway and the compaction of all fill batters are designed in accordance with the requirements of a structural engineer; (j) safety rails are provided where there is a level difference more than 0.3m and a 1 :4 batter cannot be achieved; (k) pedestrian grades steeper than 12.5% are provided with surface texturing, brushing or cleats to satisfy Class V: R 11 ramps in accordance with Australian Standards AS 4586- 2004 Clause 5.2; and (l) longitudinal sections along centreline of the access driveway are provided in accordance with the relevant sections of AS 2890.1 to demonstrate that: (i) the maximum grade does not exceed 1 in 4 (25%) with the maximum changes of grade of 1 in 8 (12.5%) for summit grades and 1 in 6.7 (15%) for sag grades; (ii) any transition grades have a minimum length of 2m; and (iii) the longitudinal sections incorporate the street cross-over design levels obtained from Council.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition were confirmed during a previous audit period. Changes made to carparking as part of the MOD 2 application are related to future substages.	
Bicycle Parking and End-of-Trip Facilities					
B18	Prior to the issue of the relevant construction certificate, revised drawings showing the staged provision of a minimum of 100 additional bicycle parking spaces must be submitted to and approved by the Planning Secretary.	C	1. Traffic Impact Assessment (TTW, 8/07/2025)	As part of the MOD 2 application, an updated Traffic Impact Assessment was included that identified that the changes to the number of bicycle parking spaces as condition under B18 were related to future substages.	
B19	Prior to the issue of the relevant construction certificate, the following design details in relation to the secure bicycle parking and end-of-trip facilities must be submitted to the Certifier for approval: (a) compliance of the layout, design and security of bicycle facilities with the minimum requirements of the latest version of AS 2890.3:2015 Parking facilities - Bicycle parking, and ; (b) the provision of end-of-trip facilities for staff in accordance with the Hornsby Development Control Plan 2013.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition were previously confirmed. Updates to the number of bicycle parking as part of MOD 2 will be confirmed in future substages.	
Geotechnical - North Connex					
B20	Prior to the issue of the relevant construction certificate for excavation works, the developer must submit design drawings and documents relating to the excavation of the site and support structures to TfNSW for endorsement (in accordance with Technical Direction GTD2012/001). The design drawings and documents must demonstrate the proposed Stage 1 works would have no impact to the North Connex tunnel and verify that any sub-basement does not encroach on the North Connex tunnel envelope.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition was confirmed prior to this audit period.	
PART C PRIOR TO COMMENCEMENT OF CONSTRUCTION					
Notification of Commencement					
C1	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.	NT	SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition was confirmed prior to this audit period. Notification for the commencement of substage 4 construction works was submitted via the planning portal on the 16/07/2024.	
C2	If the construction or operation of the development is to be staged, the Planning Secretary must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	NT	SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition was confirmed prior to this audit period. Notification for the commencement of substage 4 construction works was submitted via the planning portal on the 16/07/2024.	
Certified Drawings					
C3	Prior to the commencement of construction for the relevant construction stage, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.	NT	SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition was confirmed prior to this audit period. A construction certificate was previously provided confirming compliance with the requirement of this condition.	
Photographic Archival Recording					

C4	Prior to any demolition and/or alteration works commencing on the site in Stage 1 on the site, archival photographic recordings must be undertaken for significant building fabric and spaces, as specified by a qualified heritage consultant. The archival recordings must specifically include a detailed account of internal and external components of the buildings / spaces and context photographs of the existing site as viewed from the street and its surroundings. A copy of the final recordings must be submitted to the Certifier and Council for information.	NT	SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Demolition works occurred under substages 1 - 3. Compliance with the requirements of this condition was confirmed prior to this audit period.	
Pre-Construction Dilapidation Report - Protection of Public Infrastructure					
C5	Prior to the commencement of construction, the Applicant must: (a) consult with the relevant owner and provider of services and infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non-residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected; (c) submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and (d) provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested.	NT	SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition have previously been confirmed as compliant. No new dilapidation surveys have been required during this audit period.	
Pre-Construction Survey - Residential Properties					
C6	Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of residential buildings that are likely to be impacted by the relevant construction.	NT	SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition have previously been confirmed as compliant. No new pre construction surveys have been required during this audit period.	
C7	Where the offer for a pre-construction survey is accepted (as required by condition C6), the Applicant must arrange for a survey to be undertaken by a suitably qualified and experienced expert prior to the commencement of vibration generating works that could impact on the identified buildings.	NT	SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition have previously been confirmed as compliant. No new pre construction surveys have been required during this audit period.	
C8	Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by condition C6, the Applicant must: (a) provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report; (b) submit a copy of the Pre-Construction Survey Report to the Certifier; and (c) provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.	NT	SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition have previously been confirmed as compliant. It is noted that vibration monitoring occurred between 13 January 2026 and 3 February 2026 (outside of this audit period).	
Development Contributions					
C9	Prior to the commencement of any construction works, a payment of a levy of 1 % of the proposed cost of carrying out the development in Stage 1 must be paid to Council under section 7 .12 of the EP&A Act. **Note:** There are approval requirements for imposing a condition under section 7. 12 in respect of land within a special contributions area.	NT	SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition have previously been confirmed as compliant.	
Community Communication Strategy					
C10	No later than two weeks before the commencement of any construction, a Community Communication Strategy must be submitted to the Planning Secretary for approval and approved by the Planning Secretary prior to the commencement of construction or within another timeframe agreed with the Planning Secretary. The Community Communication Strategy must provide mechanisms to facilitate communication between the Applicant, the relevant Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction. The Community Communication Strategy must: (a) identify people to be consulted during the design and construction phases; (b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; (c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; (d) set out procedures and mechanisms: (i) through which the community can discuss or provide feedback to the Applicant; (ii) through which the Applicant will respond to enquiries or feedback from the community; and (iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation. (e) include any specific requirements around traffic, noise and vibration, visual impacts, amenity, flora and fauna, soil and water, contamination, heritage.	NT	SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition have previously been confirmed as compliant as part of substages 1 - 3. No changes have been made to the strategy since 2022.	
Community Consultative Committee					
C11	Prior to the commencement of any construction, a Community Consultative Committee (CCC) must be established for the development in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (2016). The CCC must begin to exercise functions in accordance with such guidelines before the commencement of construction and continue to do so for the duration of construction and for at least six months following completion of construction. **Notes:** • The CCC is an advisory committee only. • In accordance with the Guidelines, the Committee should comprise an independent chair and appropriate representation from the Applicant, Council and the local community.	NT	NA	Compliance with the requirements of this condition have previously been confirmed as compliant as part of substages 1 - 3.	
Demolition					
C12	Prior to the commencement of any construction, demolition work plans required by AS 2601- 2001 The demolition of structures (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier and Planning Secretary.	NT	NA	No demolition works required as part of substage 4. All demolition works occurred outside of this audit period and compliance with the requirement of this condition has previously been confirmed.	
Environmental Management Plan Requirements					

C13	Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). **Notes:** • The Environmental Management Plan Guideline is available on the Planning Portal at: https:l/www.planningportal.nsw.gov.au/majorprojectslassessmentlpost-approval • The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans	C	1. Construction Environmental Management Plan Rev 05, (Buildcorp, 8/09/2025) and subplans 2. Interviews	The CEMP was updated 8/09/2025 and includes sub plans; Community Communication Strategy & Buildcorp Complaints Management, Construction Traffic and Pedestrian Management Plan, Construction Noise and Vibration Management Plan, Construction Soil and Water Management Plan	
Construction Environmental Management Plan					
C14	Prior to the commencement of any construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary. The CEMP must include, but not be limited to, the following: (a) Details of: (i) hours of work; (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) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting; (vii) community consultation and complaints handling as set out in the Community Communication Strategy required by condition C10; (viii) the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; (b) Construction Traffic and Pedestrian Management Sub-Plan (condition C16); (c) Construction Noise and Vibration Management Sub-Plan (condition C17); (d) Construction Soil and Water Management Sub-Plan (condition C18); (e) Construction Waste Management Sub-Plan (condition C19); (f) an unexpected finds protocol for contamination and associated communications procedure; (g) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; (h) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site; (i) details of location of protective fencing (exclusion fence) to protect the significant vegetation on the southern side of the site; (j) details to demonstrate that the proposed exclusion fence on the site would not impinge on species movement within and adjoining the site; (k) details of all mitigation and management measures to ameliorate impacts on flora and fauna during the construction works as indicated in the BDAR Loreto Normanhurst Biodiversity Assessment Report (version 6), prepared by Eco Logical Australia and	**OFI**	1. Construction Environmental Management Plan Rev 05, (Buildcorp, 08/09/2025). 2. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	A review of the CEMP (Buildcorp, Rev 04) confirmed that it adequately addressed the requirements of this condition. The March 2026 IEA identified an OFI with regard to updating the ESCP to update the ESCP to reflect the site conditions current at that time, this was not completed, however it is noted that construction is now complete. Observations made during the site inspection identified a small section of rill erosion occurring within a landscaped area adjacent to the driveway. Landscape defects works were occurring at the time of the site inspection.	**OFI-01**
C15	The Applicant must not commence construction of the development until the CEMP is approved by the Certifier and a copy submitted to the Planning Secretary.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition was confirmed in the previous audit period. Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4	
C16	A Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council and TfNSW; (c) include details of predicted number of construction vehicle movements per day and detail of vehicle types, noting that vehicle movements are to be minimised during peak periods; (d) include assessment of potential impacts to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works; (e) include details of any cumulative impacts due to ongoing construction works on nearby sites; (f) include the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services. (g) detail heavy vehicle routes, access and parking arrangements; (h) detail construction vehicle access arrangements and student/ staff access to the site during construction works to ensure safe operation of the school at all times; and (i) no existing trees are to be removed to facilitate construction works that are not included in the list of trees permitted to be removed as part of this consent.	C	1. Construction Traffic and Pedestrian Management Plan (CTPMP) Version 4 (pdc, 10/07/2024) 2. Site inspection 3. Audit interviews	A review of the CTPMP (pdc, Rev4) confirmed that it adequately addressed the requirements of this condition. It is noted that construction of substage 4 is now complete.	

C17	The Construction Noise and Vibration Management Sub-Plan (CNVMSP) 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) describe the measures to be implemented to ensure that the noise generated by the construction activities do not have adverse impacts on the ongoing operation of the school; (e) include details of respite measures to be implemented for high noise generating activities (exceeding 75DBA as measured at the sensitive receiver) including (but not limited to) measures such as: • works being undertaken in continuous blocks of no more than 3 hours, with at least a 1-hour respite between each block of work generating high noise impact at the identified sensitive receiver; • respite periods implemented during the day; and • elimination of high noise generating construction works during identified examination times; (f) include strategies that have been developed with the community for managing high noise generating works; (g) describe the community consultation undertaken to develop the strategies in condition C17(d); (h) include a complaints management system that would be implemented for the duration of the construction; and (i) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the management measures in accordance with condition C 13. **Note:** the purposes of this condition 'continuous' includes any period during which there is less than one hour respite between ceasing and recommencing any of the work the subject of this condition.	C	1. Construction Noise & Vibration Management Plan (CNVMP) Rev D (RWDI, 22/10/2024) 2. Site inspection 3. Audit interviews	A review of the CNVMP (RWDI, RevD) confirmed that it adequately addressed the requirements of this condition. It is noted that construction of substage 4 is now complete.	
C18	The Applicant must prepare a Construction Soil and Water Management Plan (CSWMP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landform 2004) commonly referred to as the 'Blue Book'; (c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (d) detail all off-Site flows from the Site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to, 1 in 5-year ARI.	**OFI**	1. Construction Soil and Water Management Plan Rev 2(TTW 5/02/2025) 2. Site inspection 3. Audit interviews	A review of the CSWMP (TTW, Rev 2) confirmed that it adequately addressed the requirements of this condition. It is noted that construction of substage 4 is now complete. Observations made during the site inspection identified: - Landscaping defects work was being completed - Minor erosion occurring within a landscaped area adjacent to the driveway - coir logs installed in steep garden beds to minimise erosion during heavy rainfall	**OFI-01**
C19	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste comprising: (a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use; (b) information regarding the recycling and disposal locations; and (c) confirmation of the contamination status of the development areas of the site based on the validation results.	C	1. Construction Environmental Management Plan Rev 05, (Buildcorp, 08/09/2025) 2. Site inspection 3. Audit interviews	A review of the CWMP (Buildcorp, Rev 5) confirmed that it adequately addressed the requirements of this condition. It is noted that construction of substage 4 is now complete.	
C20	A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following: (a) minimise the impacts of earthworks and construction on the local and regional road network; (b) minimise conflicts with other road users; (c) minimise road traffic noise; and (d) ensure truck drivers use specified routes.	C	1. Construction Environmental Management Plan Rev 05, (Buildcorp, 08/09/2025) 2. Site inspection 3. Audit interviews	Section 9 of the CEMP references the Drivers Code of Conduct as being available in the CTMP which is in Appendix B (CTPMP) of the CEMP. A review of the driver code of conduct confirmed it adequately addressed the requirements outlined in this condition.	
Soil and Water					
C21	Prior to the commencement of construction, the Applicant must install erosion and sediment controls and other soil and water management measures in accordance with the CSWMSP (Schedule 3 condition C18).	**OFI**	1. Construction Soil and Water Management Plan Rev 2(TTW 5/02/2025) 2. Site inspection 3. Audit interviews	Observations made during the site inspection identified: - Landscaping defects works were being completed - Minor erosion occurring within a landscaped area adjacent to the driveway - coir logs installed in steep garden beds to minimise erosion during heavy rainfall	**OFI-01**
C22	Prior to the commencement of any construction, the Applicant must submit a Construction Worker Transportation Strategy to the satisfaction of the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be submitted to the Planning Secretary for information.	C	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition has been confirmed in the March 2026 audit. No further updates to the CWTS occurred during the audit period.	
Biodiversity					
C23	Prior to the commencement of any vegetation clearing, the number and classes of ecosystem credits (like-for-like) set out in the Biodiversity Assessment Method (BAM) Biodiversity Credit Summary Report contained in Appendix G of the Loreto Normanhurst Biodiversity Assessment Report (version 6), prepared by Eco Logical Australia and dated 16 December 2020 must be retired.	NT	NA	Vegetation clearing was completed outside of this audit period. Compliance with the requirements of this condition have been confirmed in previous audits.	
C24	The requirement to retire credits in Schedule 3 condition C23 may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem and species credits.	NT	NA	Biodiversity Conservation Fund retirement were completed outside of this audit period. Compliance with the requirements of this condition have been confirmed in previous audits.	
C25	Evidence of the retirement of credits or payment to the Biodiversity Conservation Fund in satisfaction of condition C24 must be provided to the Planning Secretary prior to carrying to commencement of any construction works.	NT	NA	Biodiversity Conservation Fund retirement were completed outside of this audit period. Compliance with the requirements of this condition have been confirmed in previous audits.	
Outdoor Lighting					
C26	Prior to the installation of outdoor lighting, evidence must be submitted to the Certifier that all outdoor lighting within the site has been designed to comply with AS 1158.3.1 :2005 Lighting for roads and public spaces - Pedestrian area (Category P) lighting - Performance and design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	Compliance with the requirements of this condition were confirmed in previous audit periods. The Occupation Certificate also included a review of the following: - Outdoor Lighting certificate (Cowyn Building Group , 13/09/2022 - Essential Fire Safety <measures Installation Certificate (Class Electrical Services Pty Ltd, 19/06/2026) - other safety measures for the building	
Ecologically Sustainable Development					

C27	Prior to the commencement of construction for the relevant construction stage, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either: (a) registering for a minimum 5-star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifier; or (b) seeking approval from the Planning Secretary for an alternative certification process.	NT	NA	Compliance with the requirements of this condition were confirmed in previous audits confirming the Department supported the alternative ESD frameworks and certification process for substage 4.	
C28	Prior to the commencement of construction for the relevant construction stage, the Applicant must engage a suitably qualified Green Star accredited professional to ensure the ESD measures indicated in the ESD SSDA Report prepared by ARUP and dated 7 January 2019 and the requirements of condition C27 are incorporated into the detailed design of the development.	NT	NA	Compliance with the requirements of this condition were confirmed in previous audits confirming a third part y had been engaged to review the architectural drawings to confirm ESD strategies could be achieved.	
Contamination					
C29	Prior to the commencement of any construction, the Applicant must engage a NSW EP Accredited Site Auditor to provide advice throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed. Evidence of the appointment of the Site Auditor must be provided to the Certifier prior to the commencement of construction.	NT	NA	Compliance with the requirements of this condition has been confirmed in previous audits. The contamination status of the site was undertaken during previous substages of the project (by a NSW EP accredited site auditor). A Remediation Action Plan (RAP) was developed to address contaminated material requiring disposal. Clearance inspection reports were completed.	
C30	Prior to the commencement of each construction substage specified in Schedule 3 condition A9 as amended by this development consent), the Applicant must conduct additional site investigations (where relevant to the substage) to confirm the full nature and extent of the contamination in accordance with Section 4 'Data Gap Investigation Requirements' of the Remedial Action Plan (Revision 1), prepared by JK Environments and dated 12/01/2021.	NT	NA	Compliance with the requirements of this condition has been confirmed in previous audits. The contamination status of the site was undertaken during previous substages of the project (by a NSW EP accredited site auditor). A Remediation Action Plan (RAP) was developed to address contaminated material requiring disposal. Clearance inspection reports were completed.	
C31	The additional site investigations required by Schedule 3 condition C30 must be documented in a report prepared by, or reviewed and endorsed by, a suitably consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.	NT	NA	Compliance with the requirements of this condition has been confirmed in previous audits. The contamination status of the site was undertaken during previous substages of the project (by a NSW EP accredited site auditor). A Remediation Action Plan (RAP) was developed to address contaminated material requiring disposal. Clearance inspection reports were completed.	
C32	The recommendations of the Remediation Action Plan (RAP) (Revision 1) prepared by JK Environments and dated 12/01/2021 and the unexpected finds procedure must be updated following results of further site investigations and implemented throughout duration of project work as required by Schedule 3 conditions C30 and C31. The updated RAP must be endorsed by the same consultant as specified in Schedule 3 condition C30.	NT	NA	Compliance with the requirements of this condition has been confirmed in previous audits. The contamination status of the site was undertaken during previous substages of the project (by a NSW EP accredited site auditor). A Remediation Action Plan (RAP) was developed to address contaminated material requiring disposal. Clearance inspection reports were completed.	
C33	The site investigation report, required in Schedule 3 condition C31, the amended RAP in Schedule 3 condition C32 and the relevant certification must be submitted to the satisfaction of the Planning Secretary at least 4 weeks prior to the commencement of any construction for the relevant substage. A copy of the Planning Secretary's approval must be submitted to the Certifier for information prior to the commencement of construction of each relevant substage.	NT	NA	Compliance with the requirements of this condition has been confirmed in previous audits. The contamination status of the site was undertaken during previous substages of the project (by a NSW EP accredited site auditor). A Remediation Action Plan (RAP) was developed to address contaminated material requiring disposal. Clearance inspection reports were completed.	
Utilities					
C34	Prior to the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	C	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026) 2.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	Compliance with the requirements of this condition was confirmed in the March 2026 audit. Electricals (testing) and gas fitting compliance certificates were sighted ,and a section 73 certificate was provided as evidence. The Occupation Certificate also identified relevant documents demonstrating compliance with the requirements of this condition.	
C35	Prior to the commencement of construction written advice must be obtained from the relevant utility providers / authorities (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition were confirmed in the March 2026 audit.	
Notification of excavation					
C36	If it is necessary to excavate below the level of the base of the footings of the adjoining roadways, the Applicant must ensure that the relevant roads authority is/are given at least seven (7) day notice of the intention to excavate below the base of the footings. The notice is to include complete details of the work.	NT	1. Site inspection 2. Audit interviews	It was confirmed by the on site personnel that excavation below roadway is not required.	
PART D DURING CONSTRUCTION					
Site Notice					
D1	A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purposes of informing the public of project details and must satisfy the following requirements: (a) minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A 1) with any text on the site notice(s) to be a minimum of 30-point type size; (b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period; (c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and (d) the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted.	C	1. Site inspection	Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4 Observations made during the site inspection confirmed that construction related signage and notices had been removed.	
Operation of Plant and Equipment					
D2	All construction plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner.	C	1.Site inspection	All construction machinery was demobilised from site by the 30 June 2026. Observations made during the site inspection did not identify any machinery on site.	
Demolition					
D3	Demolition work must comply with the demolition work plans required by Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001) and endorsed by a suitably qualified person as required by Schedule 3 condition C12.	NT	NA	Demolition works occurred outside of this audit period as part of previous substages.	
Construction Hours					
D4	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 5pm, Mondays to Fridays inclusive; and (b) between 8am and 1 pm, Saturdays. No work may be carried out on Sundays or public holidays.	C	1. Audit Interviews 2. Complaints and Incidents Register	It was confirmed that no construction related activities were undertaken outside approved hours during audit period. A review of the complaints / community issues register confirmed that there were no specific construction related noise complaints made during the audit period. It is noted that there was one enquiry regarding the date for completion of "noisy construction works" at the school. A letter box was prepared for neighbouring properties.	

D5	Construction activities may be undertaken outside of the hours in Schedule 3 condition D4 if required: (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or (c) where a variation is approved in advance in writing by the Planning Secretary or their nominee if appropriate justification is provided for the works.	NT	1. Audit Interviews	It was confirmed that no construction related activities were undertaken outside approved hours during audit period.	
D6	Notification of such construction activities as referenced in Schedule 3 condition D5 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	NT	NA	Not applicable as works did not occur outside of the approved hours, therefore notification was not required.	
D7	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: (a) 9am to 12pm, Monday to Friday; (b) 2pm to 5pm Monday to Friday; and (c) 9am to 12pm, Saturday.	C	1. Site inspection 2. Audit interviews	No rock breaking, rock hammering, sheet piling, pile driving or similar activities were reported to have occurred during audit period.	
D8	Construction of the P4A Osborn Road and the through site road and associated works must be undertaken outside the school term dates or outside the AM and PM peak pick-up/drop-off times.	NT	NA	Works were completed as part of previous substages.	
Implementation of Management Plans					
D9	The Applicant must carry out the construction of the development in accordance with the most recent version of the submitted CEMP (including Sub-Plans).	C	1. Site inspection	Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4.	
Construction Traffic					
D10	All construction vehicles (excluding site personnel vehicles) are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site or an approved on-street work zone before stopping.	C	1. Site inspection	All construction machinery was demobilised from site by the 30 June 2026. Observations made during the site inspection did not identify any machinery on site. All personnel are required to complete the Project induction which outlines vehicle movement requirements. A drivers code of conduct is also required to be completed by relevant site personnel.	
Hoarding					
D11	The following hoarding requirements must be complied with: (a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and (b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application.	C	1. Site inspection	Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4. Observations made during the site inspection confirmed that no third party advertising was present.	
No Obstruction of Public Way					
D12	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances.	C	1. Site inspection	At the time of the site inspection there were no obstructions as a result of construction activities outside of the approved construction work zone.	
Construction Noise Limits					
D13	All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved CNVMSP in Schedule 3 condition C17.	C	1. Complaints register	Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4. A review of the complaints register confirmed that there were no noise complaints made within the audit period specific to construction noise. It is noted that there was an enquiry requesting clarification on when the "noisy construction work" would be complete. The School responded the resident and followed up with a letter box drop updating residents of the construction finalisation process.	
D14	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under Schedule 3 condition D4.	C	1. Complaints register	Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4. A review of the complaints register confirmed that there were no complaints made regarding out of hours arrivals.	
D15	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' to ensure noise impacts on surrounding noise sensitive receivers are minimised.	C	1. Complaints register	Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4. A review of the complaints register confirmed that there were no noise complaints made within the audit period specific to construction noise. It is noted that there was an enquiry requesting clarification on when the "noisy construction work" would be complete. The School responded the resident and followed up with a letter box drop updating residents of the construction finalisation process.	
Vibration Criteria					
D16	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time).	NT	1. Vibration survey summary email (RWDI, 4/03/2026). 2. Complaints register	A vibration survey was undertaken between 13/01/2026 - 3/02/2026 (outside of this audit period) in response to a complaint that had been made. The survey conclude that the vibrations caused by the roller were below the usual limits for structural damage at all receivers, however were above human comfort levels, which may have been the cause for the complaint. A review of the complaints register confirmed that there had been no vibration complaints made within this audit period.	
D17	Vibratory compactors must not be used closer than 30m from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition D16.	NT	1. Vibration survey summary email (RWDI, 4/03/2026). 2. Complaints register	A vibration survey was undertaken between 13/01/2026 - 3/02/2026 (outside of this audit period) in response to a complaint that had been made. The survey conclude that the vibrations caused by the roller were below the usual limits for structural damage at all receivers, however were above human comfort levels, which may have been the cause for the complaint. A review of the complaints register confirmed that there had been no vibration complaints made within this audit period.	
D18	The limits in Schedule 3 conditions D16 and D17 apply unless otherwise outlined in the CNVMSP required by Schedule 3 condition C17.	NT	1. Complaints register	A vibration survey was undertaken between 13/01/2026 - 3/02/2026 (outside of this audit period) in response to a complaint that had been made. The survey conclude that the vibrations caused by the roller were below the usual limits for structural damage at all receivers, however were above human comfort levels, which may have been the cause for the complaint. A review of the complaints register confirmed that there had been no vibration complaints made within this audit period.	
Tree Protection					

D19	For the duration of the construction works: (a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; (b) all street trees immediately adjacent to the approved disturbance area/ property boundary/is must be protected at all times during construction in accordance with Council's tree protection requirements. Any street tree, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council; (c) all trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the Arboricultural Impact Assessment Reports (Boarding Accommodation) and (Car Parks and Through Site Link), prepared by Earthscape Horticultural Services and dated January 2021, as amended by Schedule 3 conditions B2, B3 and B5, and supplemented by the Arboricultural Impact Assessment Stage 1 Works (Boarding House) S4.55 Modification, prepared by Earthscape Horticultural Services and dated 28 September 2023 and the Arboricultural Site Consultation V3, prepared by Canopy Consulting and dated 30 April 2024; (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater; (e) pre-clearance survey of trees to be removed and identification/location of habitat trees must be undertaken by a suitably qualified ecologist. Supervision by a qualified ecologist/licensed wildlife handler during tree removal must be undertaken in accordance with best practice methods to ensure relocation of fauna in a sensitive manner; (f) in accordance with the mitigation and management measures during construction works as indicated in the BDAR Loreto Normanhurst Biodiversity Assessment Report (version 6), prepared by Eco Logical Australia and dated 16 December 2020, timing of construction works should be planned to occur outside of the spring breeding season for microbat species and nesting birds. Where possible, clearing works should be avoided in late winter/spring during breeding/nesting period for birds; (g) any trees removed that have hollows/hollow trunks or fissures should be retained as ground fauna habitat and/or used as replacement hollows and attached to trees within the development area. If re-use of the salvaged hollows is impractical, compensatory nest boxes must be installed within vegetation to be retained; (h) vehicles, machinery and building refuse must remain only within the development footprint and not impinge on the areas of retained native vegetation; (i) a weed management plan must be prepared and implemented; (j) all staff working on the development must undertake an environmental induction as part of their site familiarisation. This induction must include items such as Importance of No Go Zones in the area identified on the Biodiversity Values map/high retention value trees within the school that comprises the Blue Gum High Forest critically endangered Ecological community and the Sydney Turpentine-Ironbark Forest endangered Ecological community; and (k) landscaping in the development site must use local provenance species in accordance with condition B5.	C	1. Site inspection 2. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition was confirmed in previous audits. Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4. Observations on site confirmed that all tree protection measures had been removed.	
Tree Hollows / Nest Boxes					
D20	Any trees on-site approved for removal that have hollows must be retained in part as ground fauna habitat or used as replacement hollows and attached to trees within the site. If it is not feasible to use salvaged hollows as replacement tree hollows, an artificial nest box must be installed to replace the loss of each tree hollow at a minimum ratio of 1 :1. Details of the artificial nest box/es for targeted species must be approved in writing by a suitably qualified ecologist and included in the Landscape Plans required under Schedule 3 condition B5.	NT	1. Email correspondence - Confirming tree pruning (Bushfire Hazard Solutions, 30/05/2026) 2. Site inspection	Tree removal was completed prior to this audit period. No additional tree removal was required, however email correspondence with Bushire Hazard Solutions confirmed that some tree trimming was required to remove branches overhanging buildings as dictated by the Level 3 Arborist.	
Air Quality					
D21	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	C	1. Site inspection 3. Complaints register	There was no obvious signs of dust nuisance occurring during the site inspection. Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4. A review of the complaints register confirmed that there were no dust related complaints received during the audit period.	
D22	During construction, the Applicant must ensure that: (a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	C	1. Site inspection 3. Complaints register	There was no obvious signs of dust nuisance occurring during the site inspection. Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4. A review of the complaints register confirmed that there were no dust related complaints received during the audit period.	
Erosion and Sediment Control					
D23	All erosion and sediment control measures must be effectively implemented and maintained in accordance with the CSWMSP (Schedule 3 condition C17).	**OFI**	1. Construction Soil and Water Management Plan Rev 2(TTW 5/02/2025) 2. Daily ESC checklist 3. Site inspection	Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4 Observations on site confirmed: - Construction related ESC measures had been removed - Landscaped areas within steep terrain had coir logs in place and there was evidence of minor rill erosion in landscaped area adjacent to the driveway	**OFI-01**
Imported Soil					
D24	The Applicant must: (a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Certifier upon request.	C	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026)	Compliance with the requirements of this condition were confirmed in the March 2026 audit.	
Disposal of Seepage and Stormwater					

D25	Adequate provisions must be made to collect and discharge stormwater drainage during construction of the building to the satisfaction of the Certifier. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	NT	1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026) 2. Site inspection	Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4. It was confirmed in the March 2026 audit that the sediment pond had been removed. Observation made during the site inspection did not identify any sediment laden water or sediment build up to be present outside of the site or in the stormwater network (i.e. Gutters, drainage pits etc)	
D26	The Applicant must prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes, for the duration of construction.	C	1. Site Induction (Buildcorp, 18/11/2024)	Employees, contractors (and their sub-contractors) are required to complete a site induction which includes relevant aspects of the conditions of this consent relevant to activities they carry out in respect of the development for substage 4. A copy of the site induction was provided as evidence.	
Unexpected Finds Protocol - Aboriginal Heritage					
D27	In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site must be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by EES Group and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and EES Group to develop and implement management strategies for all objects/sites. Works must only recommence with the written approval of EES Group.	C	1. Construction Environmental Management Plan Rev 05 (Buildcorp, 08/09/2025) 2. Audit Interviews	A copy of the unexpected finds protocol for both Aboriginal and non-Aboriginal heritage is included in Sections 6 of the CEMP. There was no records of unexpected finds such as archaeological relics during the audit period.	
Unexpected Finds Protocol - Historic Heritage					
D28	If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and Heritage NSW contacted. Depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area. Works must only recommence with the written approval of Heritage NSW.	NT	NA	There was no records of unexpected finds such as archaeological relics during the audit period	
Waste Storage and Processing					
D29	All waste generated during construction must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	C	1. Site inspection	Observations made during the site inspection confirmed that all waste on site was adequately contained, no evidence of construction /landscaping waste migration across the site or offsite.	
D30	All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	C	1. Waste Tracking Registers 2. Site inspection	Monthly waste reports are provided by waste provider Skips and Scrap which identifies waste type and disposal locations. Waste reports supplied for this audit period were March 2026 and April 2026.	
D31	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse	C	1. Site inspection	There were no signs of waste concrete or concrete washout on site.	
D32	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.	C	1. Waste Tracking Registers 2. Site inspection	Monthly waste reports are provided by waste provider Skips and Scrap which identifies waste type and disposal locations. Waste reports supplied for this audit period were March 2026 and April 2026.	
D33	The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance with the requirements of the relevant legislation, codes, standards and guidelines.	C	1. Waste Tracking Registers 2. Site inspection	Monthly waste reports are provided by waste provider Skips and Scrap which identifies waste type and disposal locations. No hazardous materials were recorded as being removed from site. Waste reports supplied for this audit period were March 2026 and April 2026.	
Outdoor Lighting					
D34	The Applicant must ensure that all external lighting is constructed and maintained in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	C	1. Installation Certificate (Class Electrical Services Pty Ltd, 1/06/2026) 2. Installation Certificate - Essential Fire Safety Measures (Class Electrical Services Pty Ltd, 19/06/2026) 3. Electrical Design Services - Design Certificate -CC3 (Shelmerdines Consulting Engineers, 8/05/2026)	The Design certificate provided confirmed that lighting design was in accordance with relevant standards BASSIX and BCA requirements as well as complying with DA conditions A22 and A23. The installation certificate confirmed that all electrical work was completed in accordance with the relevant standards and BCA .BASIX requirements.	
Site Contamination					
D35	Remediation of the site must be carried out in accordance with the RAP and any variations to the RAP approved by an NSW EPA-accredited Site Auditor, as amended by this development consent.	NT	NA	No further remediation works were required to be undertaken during the audit period.	
D36	If work is to be carried out/ completed in stages, a NSW EPA-accredited Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice(s).	NT	NA	No further remediation works were required to be undertaken during the audit period.	
Independent Environmental Audit					
D37	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an Independent Audit Program or commencement of an Independent Audit.	C	1.Email DPHI approval of Audit Team (DPHI, 1/08/2025) 2. Letter - Loreto Normanhurst School Redevelopment - Independent Auditor Endorsement (DPHI, 16/08/2024)	An email from the Department confirmed that the proposed audit team had previously been approved for Substage 4 via letter dated 16/08/2024. The team approved were Christopher Griffiths, Kirsty Douglas and Gabrielle Head.	
D38	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	C	1.SAA250012 Loreto Normanhurst IEA Report Rev 0 (Epic Environmental, 28/04/2026)	The method for the previous IEA undertaken by Epic Environmental was developed and executed generally in accordance with the Independent Audit Post Approval Requirements (2026).	
D39	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those agreed to above, upon giving at least 4 weeks' notice to the applicant of the date or timing upon which the audit must be commenced.	NT	NA	The Planning Secretary did not request additional audits outside of the schedule identified in the Independent Audit Post Approval Requirements (2020).	
D40	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under Schedule 3 condition D38 of this consent; (b) submit the response to the Planning Secretary and the Certifier; and (c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary.	C	1.1. SSD8996-MOD-1 Independent Environmental Audit Report (Epic Environmental, 28/04/2026) 2. https://www.loretonh.nsw.edu.au/about/master-plan/community-engagement/ 3. Letter - Independent Audit August 2025 - February 2026 (DPHI, 3/08/2026)	The March 2026 Audit report has been made publicly available on the Applicants website. The letter from DPHI confirmed the audit report and response to the audit recommendations was received by the Department on 30 April 2026.	

D41	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.	C	1. Letter - Independent Audit August 2025 - February 2026 (DPHI, 3/08/2026)	The letter from DPHI confirmed the audit report and response to the audit recommendations was received by the Department on 30 April 2026 which was within the required timeframe.	
D42	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.	C	1.Request to cease Operational Compliance reporting for Substages 1-3 Approval (DPHI, 6/05/2026) 2. Email Correspondence: Exemption from Operation Compliance reports - Substages 1-3 (DPHI, 6/05/2025)	A letter form the Department in March 2026 approved the cessation of ongoing annual Operational Compliance Reporting for for Sub-stages 1 to 3. This approval did not include any detail to state that the outstanding 2025 report was no longer required. Therefore, compliance with this condition for substages 1 - 3 has not been met and the 2025 report remains outstanding. It is noted that the approval to cease compliance reporting does not include substage 4 (subject to this audit) and annual compliance reports for substage 4 will still be required in accordance with the Compliance Reporting Post Approval Requirements (2020).	
PART E: PRIOR TO THE ISSUE OF OCCUPATION CERTIFICATE / COMMENCMENT OF OPERATION					
Notification of Occupation					
E1	At least one month before the issue of the occupation certificate for the relevant stage, the date of commencement of the operation of the development must be notified to the Planning Secretary in writing. If the operation of the development is to be staged, the Planning Secretary must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	C	1. Letter - Occupation Notification (Loreto Normanhurst, 20/02/2026). 2. Email - Post Approval document upload confirmation (DPE, 23/02/2026)	The notification of occupation letter signed by the Director of Business Service for Loreto Normanhurst School confirmed that commencement of operation for Stage 4 would be 7/4/2026 confirming that notification complied with the timeframe specified within this condition. Email confirmation the required notification had been uploaded via the planning portal was provided confirming compliance with this condition	
External Walls and Cladding					
E2	Prior to the issue of the occupation certificate for the relevant stage, the Applicant must provide the Certifier with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance for external walls against the relevant requirements of the BCA : 74: External wall disclosure statement (Dunrite Linings, 20/03/2026) 75: External wall disclosure statement (Façade Concept NSW Pty Ltd 26/03/2026) 79: Waterproofing Installation certificate - External areas (Danlaid CFS Pty Ltd 09/04/2026)	
E3	The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	**NC**	1. Letter - Notification of documentation provided other Certifier (ctlg, 7/08/2026 2. Post Approval Form (online portal, 6/08/2026)	Evidence was provided demonstrating the submission of documentation as required by this condition was submitted to the Planning Secretary, however it was outside of the seven day timeframe (Occupation certificate date being 15 July 2026).	**NC-04**
Post Construction Dilapidation Report - Protection of Public Infrastructure					
E4	Prior to the commencement of operation, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must: (a) ascertain whether the construction works created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition C5 of this consent; (b) have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads). (c) be submitted to the Certifier; (d) be forwarded to Council for information; and (e) be provided to the Planning Secretary when requested.	C	1. Dilapidation Report - Post Construction report Council Assets (LCG, 24/02/2026) 2. Email correspondence Council Assets Dilapidation Report (17/03/2026) 3. Email correspondence - Post Construction Dilapidation Report to Council (ctlg, 12/06/2026) 4.Email correspondence - Damage to Council Assets (Hornsby Shire Council, 10/02/2026) 5. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	The post construction dilapidation was completed as required by this condition. The report identified that observation identified that the Council assets assessed were considered "good" - items do not appear to have any defects and are in good condition.. A copy of the dilapidation report was provided to Council, who responded via email confirming all reinstatement works to Council infrastructure was completed by Council Contractors.	
Repair of Public Infrastructure					
E5	Unless the Applicant and the relevant public authority agree otherwise, the Applicant must, prior to the commencement of operation: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the construction works; and/or (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development. Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions payable under this consent.	C	1. Email correspondence - Damage to Council Assets (Hornsby Shire Council, 10/02/2026)	Correspondence received by the restorations supervisor at Hornsby Shire Council confirmed that all reinstatement of council infrastructure including any asphalt pavement or concrete path, kerb was reinstated by council contractors under the terms of the road opening permit. During the site inspection the road surface and gutters of Mt Pleasant Ave immediately adjacent the site were inspected and no damage was identified.	
Post Construction Survey - Residential Properties					
E6	Where a pre-construction survey has been undertaken in accordance with condition C6, prior to the commencement of operation the Applicant must engage a suitably qualified and experienced expert to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must: (a) document the results of the post-construction survey and compare it with the pre- construction survey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition C7; (b) be provided to the owner of the relevant buildings surveyed; (c) be provider to the Certifier; and (d) be provided to the Planning Secretary when requested.	C	1. Multiple Post construction dilapidation Reports (LCG) - Loreto assets - gymnasium and aquatic centre (LCG 24/02/2026). - Loreto assets - primary school (LCG 24/02/2026). - Residential properties - Mt Pleasant Ave, 33, 35, 37, 39, 41, 45, 47 (LCG, 24/02/2026) 2. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	Post construction dilapidation reports were completed for the Schools Gymnasium and Mt Pleasant Ave residents and were provided to the certifier for review as part of the occupation certificate	
E7	Where the Post-Construction Survey Report determines that damage to the identified property occurred as a result of the construction works, the Applicant must repair, or pay the full costs associated with repairing the damaged buildings, within an agreed timeline between the owner of the identified property and the Planning Secretary	C	1. Multiple Post construction dilapidation Reports (LCG) - Loreto assets - gymnasium and aquatic centre (LCG 24/02/2026). - Loreto assets - primary school (LCG 24/02/2026). - Residential properties - Mt Pleasant Ave, 33, 35, 37, 39, 41, 45, 47 (LCG, 24/02/2026) 2. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	Post construction dilapidation reports did not identify any significant damage at the properties as a result of the construction works. Some minor cracking was identified in a couple of residential properties, however the reports did not confirm that these were a result of construction,	
Utilities and Services					

E8	Prior to the issue of the occupation certificate for the relevant stage, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the *Sydney Water Act 1994.*	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026. 2. Subdivider/Developer Compliance Certificate - Case No. 214015 (Sydney Water).	The Occupation certificate provided for substage 4 included review of the compliance certificate for water and sewage infrastructure under the Sydney Water Act. A copy of the certificate was also provided as evidence demonstrating compliance with the requirement of this condition.	
Works as Executed Plans					
E9	Prior to the issue of the occupation certificate for the relevant stage, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifier.	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026). 2. 241730-WAE-CIVIL-RevA-SH1(LCG Global Pty Ltd, 23/4/2026) 3. 241730-WAE-CIVIL-RevA-SH2 (LCG Global Pty Ltd, 23/4/2026)	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate stormwater drainage and finished ground levels were constructed as approved (works as executed drawings): As executed drawings provided were signed and dated by a registered surveyor.	
Green Travel Plan (GTP)					
E10	Prior to the issue of any occupation certificate which permits an increase in student and staff numbers, the applicant must update the GTP in consultation with TfNSW and Council with an Implementation Strategy that commits to specific management actions, including operational procedures to be implemented along with timeframes. The GTP must include, but not be limited to: (a) be prepared by a suitably qualified traffic consultant; (b) analysis of current travel survey data and parking survey data undertaken by an independent qualified traffic/transport professional as required by Schedule 3 Condition E10(m), including the survey dates, school postcode data and discussion of how this data has informed the mode share targets and actions of the GTP; (c) identify the number of staff and students within reasonable walking / cycling distance; (d) specific tools and actions to help achieve the objectives and mode share target of 5.1% reduction in staff car trips and 11.4% for students; (e) an implementation strategy that commits to specific actions (including operational procedures to be implemented along with timeframes) to encourage the use of public and active transport and discourage the use of single occupant car travel to access the site; (f) details of bicycle parking and dedicated end of trip facilities including but not limited to lockers, showers and change rooms and e-bike charging station(s) for staff and students to support an increase in the non-car mode share for travel to and from the site; (g) a Transport Access Guide for staff, students and visitors providing information about the range of travel modes, access arrangements and supporting facilities that service the site; (h) a communication strategy for engaging with students, staff and visitors regarding public and active transport use to the site and the promotion of the health and wellbeing benefits of active and non-car travel to the site; (i) include a mechanism to monitor the effectiveness of the measures of the plan; and (j) the appointment of a Travel Plan Coordinator responsible for implementing the plan and its ongoing monitoring and review, including the delivery of actions and associated mode share targets. (k) the location of all car parking spaces on the school site and their allocation (i.e. driving-age student, staff, visitor, accessible, emergency); (l) operational transport arrangements to manage potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to reduce queuing impacts associated with vehicles accessing drop-off and pick-up zones, prevent overflow parking onto the residential side of Osborn Road and Mount Pleasant Avenue and address any parking shortfall that is identified in the current surveys; and (m) an annual monitoring and review program, reviewed and confirmed by an independently qualified traffic/transport professional, for the duration of operation that includes (but is not limited to) the following: (i) within 12 months of the student population reaching 1400, a suitably qualified Travel Plan Coordinator shall implement the objectives and strategies within the GTP for three years; (ii) the review/audit by the Travel Plan Coordinator, as confirmed by the independently qualified traffic/transport professional, shall ensure that parking demand from students and staff is contained within the parking provided within the site. The result of the annual review is to be provided to Council and TfNSW for information within two months of completing the annual review/audit. And a copy made available to the Planning Secretary upon request within two working days; (iii) where the annual review/audit required by Schedule 3 Condition E10(m)(ii) above identifies that parking demand attributable to school students and staff are not being met on site, the Applicant is to implement further measures in consultation with Council and TfNSW to mitigate the impacts on street parking demand prior to the next annual review/audit cycle; (iv) evidence of this consultation in the form of a report must include a description of the proposed measures and a schedule for implementing the measures, and be submitted to the Planning Secretary with the annual review/audit report required under E10(m)(ii); (n) notwithstanding Schedule 3 Condition E10(m) above, the Planning Secretary may consider revisions to timing to commence, extend and conclude the audit/review program, notably in instances where the Applicant demonstrates that: (i) parking demand from students and staff is contained on site on a consistent basis; or (ii) parking demand from students and staff is not consistently contained on site; or (iii) where parking demand from students and staff is not consistently contained on site, however, suitable evidence is provided detailing how impacts from the parking overflow have been mitigated. Note: The applicant must submit a copy of the plan for the endorsement of TfNSW via development.sco@transport.nsw.gov.au, prior to the issue of the occupation certificate.	**C**	1. Green Travel Plan - Loreto Normanhusrt Master Plan (TTW, 10/08/2022). 2. Email - Confirmation Travel Plan addresses requirements (bm+g, 02/03/2026) 3. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	The occupation certificate lists the relevant documents related to GTP as part of their assessment of compliance. The email dated 02/03/2026 from bm+g (certifier) also confirms that the outstanding requirements to demonstrate compliance with this condition were considered closed out. It is noted as part of the MOD 2 consolidated consent conditions, that new sub conditions have been included (sub conditions k - n). These items relate to the operational phase. Compliance with the requirements of this condition including ne requirements will be confirmed in future independent environmental audits.	
Operational Transport and Access Management Plan (OTAMP)					

E11	Prior to the issue of the occupation certificate for the through site road, new carparks and drop-off/pick-up facilities, an OTAMP must be prepared by a suitably qualified person, in consultation with Council and TfNSW, and submitted to the satisfaction of the Certifier. The OTAMP must address the following: (a) the recommendations and commitments within the document titled ref: 181202 TAAB, prepared by Taylor Thomson Whitting and dated 8 December 2020 (as amended by this consent): (b) detailed pedestrian analysis including the identification of safe route options to identify the need for management measures such as staggered school start and finish times to ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish; (c) the location of all car parking spaces on the school campuses and their allocation (i.e. staff, visitor, accessible, emergency, etc.); (d) the access and security arrangements of the boarding accommodation basement car park including clarification of how: (i) school staff and students not residing at the boarding accommodation are provided safe access to the car and bicycle parking within the building; and (ii) unauthorised access of the boarding accommodation basement would be prevented; (e) the operation of the pick-up/drop-off facilities confirming that all facilities would be open and allow access for on-site vehicle queuing at least 30 minutes prior to the afternoon school pick-up period commencing each day; (f) the location and operational management procedures of the pick-up and drop-off parking located within the project site, including staff management/traffic controller arrangements; (g) delivery and services vehicle and bus access and management arrangements; (h) management of approved access arrangements; (i) potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing pick-up and drop-off parking in the project site; (j) car parking arrangements and management associated with attendance at the school by staff, parents and persons associated with the school to ensure no parking occurs on Osborn Road and Mount Pleasant Avenue; (k) monitoring of Mount Pleasant Avenue and Osborn Road by traffic marshals and/or staff during peak periods to ensure pick-up/drop-off does not occur on these roads; (l) booking system / management of the tandem car parking spaces; (m) car parking arrangements and management associated with the proposed use of school facilities by community members; and (n) a monitoring and review program.	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026) 2. Email - Confirmation Travel Plan addresses requirements (bm+g, 02/03/2026) 3. Operational Transport and Access Management Plan (TTW, 9/08/2022).	A review of the OTAMP was undertaken in a previous audit period confirming it adequately addressed the requirements of this condition, Evidence was also provided confirming the plan was submitted to both Council and TfNSW. confirm was confirmed during a previous audit period. The email dated 02/03/2026 from bm+g (certifier) confirms that the requirements of this condition were resolved with OC#22128.	
Boarding Accommodation Operational Management Plan					
E12	Prior to the issue of the first occupation certificate for the boarding accommodation, a Boarding Accommodation Operational Management Plan (BAOMP) must be submitted to and approved by the Planning Secretary. The BAOMP must: (a) include all the measures to be implemented on the premises in terms of safety & security, amenity and health including but not limited to matters relating to curfews and after-hours access, bringing of visitors on to the site, emergency response and use of communal areas etc; (b) include all the responsibilities of the caretaker/manager; (c) include an Incident Register to be maintained by the caretaker/manager. This Register must be produced upon demand by any Council officer or NSW Police Officer. The Register must contain a direction that all incidents of a criminal nature are to be reported to the Police immediately; (d) be dated and the name and signature of the author of the document must be included; and (e) be displayed in prominent locations within the premises and a copy of the Plan must be provided to all residents of the boarding accommodation.	C	1. Boarding Accommodation Operational Management Plan - McCabe House Rev 1 (December 2025). 2.Email - confirmation the BAOMP available on the Applicants website (CTPG, 15/04/2026) 3.Letter - BAOMP, Condition E12 compliance (DPH&I, 18/02/2026) 4.Post Approval Form - confirming documents upload 5. https://www.loretonh.nsw.edu.au/about/master-plan/	Evidence provided confirmed that a BAOMP had been developed, submitted and approved by the Planning Secretary. The BOAMP is also available on the Applicants website.	
E13	Prior to occupation and commencement of the use of the boarding accommodation, a notification letter must be forwarded to Council and neighbours providing contact details for the caretaker/manager so that any issues regarding the operation of the premises can be addressed promptly. Evidence of this letter being forwarded as required in this condition must be provided to the satisfaction the Certifier. The letter must also be forwarded to the CCC for information	C	1. Email - Notification New Boarding House (CTPG, 14/04/2026). 2. Letter - Notification of Boarding House Contact Details (Loreto Normanhurst Director of Business, 16/03/2026). 3.Photo - letter drop (x2)	Evidence provided confirmed that notification to relevant stakeholders complying with the requirements od this condition had occurred. The letter provided formal notification to residents, Council and the CCC of the contact details for the Boarding House . Contact details including name, position, and contact details.	
Evacuation and Emergency Planning					
E14	Prior to the commencement of operation, a Bush Fire Emergency Management and Evacuation Plan must be prepared consistent with Development Planning A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan December 2014.	C	1. Bushfire Emergency Management and Evacuation Plan Rev 1 (Building Code & Bushfire Hazard Solutions P/L, 02/04/2026). 2. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026) 3. Compliance Statement (Bushfire hazard Solutions, 4/06/2026).	A review of the BFEMEP confirmed it was developed generally in accordance with: - Guide to developing a Bush Fire Emergency Management and Evacuation Plan – 2014 - AS3745-2010 Planning for emergencies in facilities The Bushfire Compliance Statement confirmed design and construction compliance with the SSD conditions A22 - A25, B24 and E14	
Mechanical Ventilation					
E15	Prior to the issue of the occupation certificate for the relevant stage, the Applicant must provide evidence to the satisfaction of the Certifier that the installation and performance of the mechanical ventilation systems complies with: (a) AS 1668.2-2012 The use of air-conditioning in buildings Mechanical ventilation in buildings and other relevant codes; and (b) any dispensation granted by Fire and Rescue NSW.	C	1. Installation certificate - Mechanical services (Eagle Air-conditioning, 1/07/2026).	Certificate provided confirms Mechanical Ventilation and Air Conditioning System has been installed in accordance with Part E2 of the BCA.	
Operational Noise - Design of Mechanical Plant, Equipment and School Bell/PA System					
E16	Prior to the issue of the occupation certificate for the relevant stage, the Applicant must submit evidence to the Certifier that the appropriate noise mitigation measures required under Schedule 3 condition B12 have been incorporated into the design to ensure the development will not exceed the recommended operational noise levels identified in the Construction and Operational Noise Assessment prepared by Wilkinson Murray and dated 16 December 2020.	C	1. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the requirements of this condition: Noise Mitigation Design Statement (Cowyn Building Group, 13/09/2022)	
Car Parking, Service Vehicle and Bicycle parking Arrangements					

E17	Prior to the issue of the occupation certificate for any relevant construction stage, evidence must be submitted to the satisfaction of the Planning Secretary that demonstrates that: (a) the car-parking, service vehicle areas, bicycle parking facilities comply with the approved Staging Report under Schedule 3 condition A10, the amended Staging Plan under Schedule 3 condition B1 and the requirements of Schedule 3 conditions B17 and B18; (b) appropriate pedestrian and cyclist advisory signs have been provided; (c) all works/regulatory signposting associated with the proposed developments have been undertaken at no cost to the relevant roads authority; (d) appropriate signage has been provided within the site to direct the pedestrians to the safe pedestrian crossing facilities within the site; (e) the location and design of the bicycle spaces comply with the provisions of Schedule 3 condition B19; and (f) end-of-trip facilities for staff and students are provided.	C	1.Letter - Condition E17 Car Parking service vehicles and Bicycle Parking Arrangements - compliance (TTW, 12/06/2026) 2. Letter - Car Parking Service Vehicles and Bicycle Parking Arrangements (DPH&I, 01/07/2026) 3.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026) 4. Letter - Compliance with condition E17(f) (Loreto Normanhurst Director of Business, 2/03/2026). Photographic evidence	TTW provided a statement addressing each requirement outlined in this condition, including supporting documents to confirm compliance. Evidence of submission of relevant documentation to the Planning Secretary was provided, along with photographic evidence of parking arrangements and relevant signage. A letter provided by the Planning Secretary confirmed that the evidence submitted against the requirements of this condition were considered satisfactory, confirming compliance for Stage 1 substage 4.	
Road Damage					
E18	Prior to the commencement of operation, the cost of repairing any damage caused to council or other public authority's assets in the vicinity of the Subject site as a result of construction works associated with the approved development must be met in full by the Applicant.	C	1. Email correspondence - Damage to Council Assets (Hornsby Shire Council, 10/02/2026)	Correspondence received by the restorations supervisor at Hornsby Shire Council confirmed that all reinstatement of council infrastructure including any asphalt pavement or concrete path, kerb was reinstated by council contractors under the terms of the road opening permit. During the site inspection the road surface and gutters of Mt Pleasant Ave immediately adjacent the site were inspected and no damage was identified.	
Fire Safety Certification					
E19	Prior to the issue of the occupation certificate, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety Certificate must be submitted to the relevant authority and Council. The Fire Safety Certificate must be prominently displayed in the building.	C	1. Fire Safety Certificate- part 11 of the EP&A Reg (13/07/2026)	A signed Fire Safety Certificate was provided as evidence demonstrating compliance with the requirements of this condition.	
Structural Inspecting Certificate					
E20	Prior to the issue of the occupation certificate of the relevant parts of any new or refurbished buildings, a Structural Inspection Certificate or a Compliance Certificate must be submitted to the satisfaction of the Certifier. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the approval authority and the Council after: (a) the site has been periodically inspected and the Certifier is satisfied that the structural works is deemed to comply with the final design drawings; and (b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.	C	1. Structural Engineering Inspection Certificate (Birzulis, 23/06/2026). 2. Structural Design and Installation Certificate - Post tensioning Design Loreto Normanhurst Boarding School (Edge Consulting Engineers, 11/03/2026) 3. Email - submission of evidence complying with condition E20 (CTPG, 12/06/2026)	The structural engineering inspection certificate confirms that inspections were carried out during the course of the construction phase and did not identify anything to suggest the structural design had not been followed.. The certificate also confirmed that the balustrades throughout the building had been designed and installed in accordance with the relevant standard. Teh post tensioning design certificate confirmed that the structural design complies with the National Construction Code (BCA 2022 Amendment 2), the required fire resistance periods (FRLs) as per Specification 5 of BCA, Fire Engineering Report Project No. P00372 Rev 3 Issued 01 July 2024 by E-LAB Consulting and relevant standards. A document register was also included in the certificate. Correspondence confirming submission to Council was provided.	
Compliance with Food Code					
E21	Prior to the issue of the occupation certificate for the boarding accommodation, the Applicant is to obtain a certificate from a suitably qualified tradesperson, certifying that the kitchen, food storage and food preparation areas have been fitted in accordance with the AS 4674 Design, construction and fit-out of food premises and provide evidence of receipt of the certificate to the satisfaction of the Certifier.	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: - 88. food preparation construction installation certificate (The Mack Group, 10/04/2026) - 90. Food premises inspection report (Hornsby Shire Council, 08/04/2026)	
Stormwater Quality Management Plan					
E22	Prior to the commencement of operation, an Operation and Maintenance Plan (OMP) is to be submitted to the satisfaction of the Certifier along with evidence of compliance with the OMP. The OMP must ensure the proposed stormwater quality measures remain effective and contain the following: (a) maintenance schedule of all stormwater quality treatment devices; (b) record and reporting details; (c) relevant contact information; and (d) Work Health and Safety requirements.	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026) 2. Civil certificate - WSUD and OSD (TTW, 2/06/2026).	Ac copy of the civil certificate was provided as evidence which confirmed specifications had been provided by the WSUD device manufacturer confirming cartridge number and locations are consistent with the approved civil design, refer to Appendix 3 . Based on the above documentation the OSD and WSUD will meet the design intent including the water quality requirements in Schedule 3 Condition B11 satisfying conditions E37 and E39 (b).	
Warm Water Systems and Cooling Systems					
E23	The installation of warm water systems and water-cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 1 (or Part 3 if a Performance-based water-cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings Microbial control Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires' Disease.	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026). 2. Installation certificate - Hydraulic (Fluid Contracting, 29/04/2026).	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: - 17. Installation certificate - Hydraulic (Fluid Contracting, 29/04/2026). The installation certificate included a statement confirming the hydraulic services have been installed / implemented / constructed, inspected, assessed and tested (where appropriate) in accordance with the DA conditions, relevant BCA codes and Australian Standards.	
Outdoor Lighting					
E24	Prior to the issue of the occupation certificate for the relevant stage, the Applicant must submit evidence from a suitably qualified practitioner to the Certifier that demonstrates that installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers and: (a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and (b) has been mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties, public road network or bushland.	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026), 2. Installation certificate (Class Electrical, 1/06/2026).	The electrical certificate provided certified that the electrical services were installed / implemented / constructed, inspected, assessed and tested (where appropriate) in accordance with the relevant BCA clauses and BASIX certificate.	
Signage and no right turn restriction					
E25	Prior to the issue of an occupation certificate for the relevant stage, way-finding signage and signage identifying the location of staff car parking must be installed.	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: - 100. Carpark signage Installation certificate (Carpark-King Pty Ltd, 30/03/2026)	

E26	Prior to the issue of an occupation certificate for the relevant stage, bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas.	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: - 49. Bicycle Signage and Parking Installation Certificate (Carpark-King Pty Ltd, 30/03/2026)	
E27	Prior to the issue of the occupation certificate for the through site road, the Applicant must provide the following to the satisfaction of the Certifier: (a) evidence to demonstrate that "No stopping" restrictions have been installed within the through site road (effective at all times); (b) evidence of endorsement from Council's Traffic Committee and/or TfNSW (where applicable) to install a "No Right Turn" from Mount Pleasant Avenue onto Pennant Hills Road for the following time periods: (i) 8am to 9.30am school days; and (ii) 2.30pm to 4pm school days (c) evidence, of any alternative advice (including refusal) from the relevant roads authority (Council or TfNSW), if the requirement of Schedule 3 condition E27(b) is not endorsed by the relevant roads authority; (d) Evidence to demonstrate that the "No Right Turn" signage has been installed, in the case endorsement is obtained from the relevant roads authority(s).	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026) 2. Email correspondence - installation of signage (Hornsby Shore Council and Loreto, 22/12/2025) 3. Photo of signage (email dated 25/02/2026)	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: - 149. Road Safety Audit Report - P1A, P3A and Through Site Link (AMWC RSA, 12/09/2022) Photographic evidence provided confirmed that the signage had been installed as per the requirements of this condition.	
Operational Waste Management Plan (OWMP)					
E28	Prior to the commencement of operation, the Applicant must prepare an OWMP for the development and submit it to the Certifier. The OWMP must: (a) incorporate relevant amendments to the development required under Schedule 3 condition B2; (b) detail the type and quantity of waste to be generated during operation of the development; (c) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); (d) detail the materials to be reused or recycled, either on or off site; and (e) include the Management and Mitigation Measures included in EIS Appendix P.	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	An OWMP was submitted as part of the Modification application that adequately met the requirements of this condition. The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: - 146. Operational Waste Management Plan (Property Development Solutions (Aust) Pty Ltd, 12/08/2024)	
Site Contamination					
E29	If, based on further site investigations report undertaken in accordance with Schedule 3 condition C31, it is determined that ongoing on-site management of soil or groundwater contamination is required, then the following requirements must be satisfied: (a) the Applicant must engage a NSW EPA-accredited Site Auditor to confirm the appropriateness of the site for the proposed use. The Applicant must obtain from a NSW EPA-accredited Site Auditor a Section A2 Site Audit Statement accompanied by an Environmental Management Plan prepared by a certified consultant and submit it to the Planning Secretary and relevant Council for information no later than one month before the commencement of operation; and (b) the development must not be used for the purpose approved under the terms of this consent until a Site Audit Statement determines the land is suitable for that purpose and any conditions on the Site Audit Statement have been complied with.	C	1.Interim Site Audit Advice - review and Endorsement of Substage 4 Validation Report (Enviroview, 11/12/2024) 2. Email correspondence - Site contamination audit (bm+g, 28/05/2026).	Compliance with the requirements of this condition were previously confirmed. The interim advice provided by Enviroview reported that no further contaminated soil was identified or removed during the audit period. The correspondence from bm+g (certifier) upon final occupation certificate to be issued for the final stage, a Section A2 Site Audit Statement will be required accompanied by a an environmental management plan. The letter from Enviroview confirmed no further requirements for substage 4. Compliance with this condition will need to be confirmed for substages 5 and 6 and final certification provided to close out full compliance with the condition.	
Landscaping					
E30	Prior to the issue of an occupation certificate for the relevant stage, landscaping of the site must be completed in accordance with approved landscape plan(s) under Schedule 3 condition B5.	C	1. Installation certificate (O Landscapes, 7/06/2026)	The installation certificate included a statement certifying that the landscaping areas had been installed / implemented / constructed in accordance with the BCA clause and Australian Standards	
E31	Prior to the issue of an occupation certificate for the relevant stage, the Applicant must submit an Operational Landscape Management Plan to manage the proposed landscaping on-site, to the satisfaction of the Certifier. The plan must: (a) describe the ongoing monitoring and maintenance measures to manage proposed landscaping; (b) be consistent with the Applicants Management and Mitigation Measures in the RtS Appendices C and I; and c) incorporate the indirect impact mitigation measures indicated in the BDAR Loreto Normanhurst Biodiversity Assessment Report (version 6) prepared by Eco Logical Australia dated 16 December 2020 relevant to the ongoing operation of the development	C	1. Operational Landscape Management Plan Rev 1 (Context, 3/03/2026). 2. Installation certificate (O Landscapes, 7/06/2026) 3. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026) 4. Biodiversity Development Assessment Report (EcoLogical, 16/12/2020).	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: - 147. Operational Landscape Management Plan Rev 1 (Context, 3/03/2026) A review of the management plan confirmed compliance with the requirements of this condition: a) and b) monitoring and maintenance measures are outlined in sections 2 (maintenance summary) and section 3 outlines the individual maintenance measures to be implemented. - Section 4 includes management measures for ecological impacts. c) Mitigation measures for indirect impacts relevant to the operational phase of the project int he BDAR report included hygiene protocols to prevent spread of seeds which has been addressed in sections 3.2, 3.7 and 4.2	
BASIX					
E32	Prior to the issue of the occupation certificate for the boarding accommodation building, the Applicant must implement the BASIX commitments required by Schedule 3 condition B7.	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: - 180 Section J1V3 & BASIX Compliance Statement an& Supporting Documentation (E-Lad Consulting Pty Ltd, 25/06/2026)	
Pennant Hills Road Vehicular Entrance					
E33	Prior to the issue of any occupation certificate, removable bollards must be installed at the Pennant Hills Road vehicular entrance of the driveway accessing the Chapel.	NT	SAA240010.01 Loreto Normanhurst IEA Audit Report (Epic Environmental, 27/11/2024)	No further updates to previous audit finding. Observations made during the 2024 audit site inspection confirmed that removeable bollards had been installed in accordance with the requirements of this condition.	
Road Safety Audit					
E34	Prior to the issue of an occupation certificate for internal through site road and drop-off/pick-up facilities, a Road Safety Audit (RSA) must be conducted on the school pick-up and drop off areas, through site road, pedestrian and vehicular accesses to the school. The RSA must be undertaken in accordance with Austroads Guide to Road Safety Part 6: Managing Road Safety Audits and Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits.	NT	SAA220009.01 Loreto Normanhurst IEA Audit Report Rev 4 (Epic Environmental, 04/09/2023)	No further updates to previous audit finding. The internal through site road and drop off / pick up facilities were completed in sub stages 1 - 3. Compliance with the requirements of this condition were confirmed in the previous IEA stating that the RSA was completion accordance with the requirements of the condition.	

E35	The results of the RSA and the relevant recommendations, including any measures to improve road safety must be submitted to the Certifier for information within one month of undertaking the audit and prior to the issue of that substage.	NT	SAA220009.01 Loreto Normanhurst IEA Audit Report Rev 4 (Epic Environmental, 04/09/2023)	No further updates to previous audit finding. Compliance with the requirements of this condition were confirmed in the previous IEA. : - The internal through site road and drop off / pick up facilities were completed in substates 1 - 3, the RSA was sent to the certifier on 21/09/22 which was within one month of the audit	
E36	Based on the recommendations of the RSA, appropriate road safety and/or traffic management measures must be implemented, in consultation with Council and TfNSW, within 3 months of the RSA and evidence submitted to the satisfaction of the Certifier.	NT	SAA220009.01 Loreto Normanhurst IEA Audit Report Rev 4 (Epic Environmental, 04/09/2023)	No further updates to previous audit finding. Compliance with the requirements of this condition were confirmed in the previous IEA: - The RSA was forwarded to both Council and TfNSW on 16/09/22 via email. TfNSW responded that they had no comments.	
Certification of WSUD Facilities					
E37	Prior to the issue of an occupation certificate for the relevant stage, a certificate from a Civil Engineer must be obtained stating that the WSUD facilities have been constructed and will meet the water quality targets set out in the approved WSUD Strategy required by Schedule 3 Condition B11.	NT		It is the Auditors understanding that a certificate from a suitably qualified engineer confirming the site WSUD facilities meets the requirements of this condition will be provide at the completion of Stage 1 works.	
Damage to Council Assets					
E38	Any damage caused to Council's assets as a result of the construction or demolition of the development must be rectified by the applicant in accordance with AUS-SPEC Specifications (www.hornsby.nsw.gov.au/property/build/aus-spec-terms-and-conditions. Rectification works must be undertaken prior to the issue of an occupation certificate, or sooner, as directed by Council.	C	1. Email correspondence - Damage to Council Assets (Hornsby Shire Council, 10/02/2026)	Correspondence received by the restorations supervisor at Hornsby Shire Council confirmed that all reinstatement of council infrastructure including any asphalt pavement or concrete path, kerb was reinstated by council contractors under the terms of the road opening permit. During the site inspection the road surface and gutters of Mt Pleasant Ave immediately adjacent the site were inspected and no damage was identified.	
Creation of Easements (Application for the Execution of legal documents)					
E39	Prior to the issue of the occupation certificate for the relevant stage, the following easement/s must be created on the title of the property under the Conveyancing Act 1919: (a) the creation of an appropriate "Positive Covenant" and "Restriction as to User" over the constructed on-site detention/retention systems and the water quality devices, within the lots in favour of Council in accordance with council's prescribed wordings. The position of the on-site detention and water quality system is to be clearly indicated on the title; and (b) to register the OSD and water quality devices easement, the restriction on the use of land "works as executed" details of the on-site-detention system must be submitted verifying that the required storage and discharge rates have been constructed in accordance with the design requirements. The details must show the invert levels of the onsite system together with pipe sizes and grades. Any variations to the approved plans must be shown in red on the "works-as-executed" plan and support by calculations. Note: Council must be nominated as the authority to release, vary or modify any easement, restriction or covenant.	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026) 2. Civil certificate - WSUD and OSD (TTW, 2/06/2026).	Ac copy of the civil certificate was provided as evidence which confirmed specifications had been provided by the WSUD device manufacturer confirming cartridge number and locations are consistent with the approved civil design, refer to Appendix 3 . Based on the above documentation the OSD and WSUD will meet the design intent including the water quality requirements in Schedule 3 Condition B11 satisfying conditions E37 and E39 (b).	
Arborist Certification					
E40	Prior to the issue of the occupation certificate for the relevant stage, the project Arborist must submit to the Certifier a certificate that details: (a) all tree protection requirements were complied with for the duration of the construction works in accordance with the Arboricultural Impact Assessments Reports 'Boarding House' and 'Car Parks and Through Site Link', prepared Earthscape Horticultural Services and dated 21 January 2021, as amended by Schedule 3 conditions B2, B3, and B5 and supplemented by the Arboricultural Impact Assessment Stage 1 Works (Boarding House) S4.55 Modification, prepared by Earthscape Horticultural Services and dated 28 September 2023 and the Arboricultural Site Consultation V3, prepared by Canopy Consulting and dated 30 April 2024; (b) all completed works relating to tree protection and maintenance have been carried out in compliance with the conditions of consent and approved plans (as amended by conditions of this consent); (c) dates, times and reasons for all site attendance by the project Arborist/s; and (d) all works undertaken to maintain the health of retained trees.	C	1.Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	The Occupation certificate provided for substage 4 included details of documentation provided to demonstrate compliance against the the requirements of this condition: - 154. Arboricultural Compliance Statement (Arbor report Vegetation Management Consultants, 1/06/2026)	
Pennant Hills Road Vehicular Entrance					
F1	Bollards in accordance with the requirements of condition E33 must be installed at the Pennant Hills Road vehicular entrance between Monday and Friday to prevent access by general traffic. The Pennant Hills Road access is only allowed to be opened for use on the weekend for ceremonial vehicles accessing the Chapel.	NT		Compliance with the requirements of this condition were confirmed in a previous audit period.	
Early Learning Centre Car Parking					
F2	*Deleted by SSD-8996-MOD-1*				
F3	*Deleted by SSD-8996-MOD-1*				
Operation of Plant and Equipment					
F4	All plant and equipment used on site must be maintained in a proper and efficient condition operated in a proper and efficient manner.	C	1.Site inspection 2. Plant Register	All construction machinery was demobilised from site by the 30 June 2026. A copy of the plant register was provided which identified each planning type, subcontractor responsible, inspections and status of equipment.	
Warm Water Systems and Cooling Systems					
F5	The operation and maintenance of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 2 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires' Disease.	NT	NA	Compliance with the requirements of this condition will be confirmed in future independent environmental audits. The Boarding House has only just completed construction with occupation/operation yet to commence.	
Community Communication Strategy					
F6	The Community Communication Strategy required by condition C10, as approved by the Planning Secretary, must be implemented for a minimum of 12 months following the completion of construction.	NT	1. Site inspection. 2. Audit interviews.	Construction on site was completed on 30 June, with all construction plant removed offsite. Compliance with the requirements of this condition will be assessed in future operational audit periods.	
F7	The CCC required by condition C11 must be operational at least 6 months after completion of the Stage 1 works.	NT	1. Site inspection. 2. Audit interviews.	Compliance with the requirements of this condition will be assessed in future operational audit periods.	
Operational Noise Limits					

F8	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in the Construction and Operational Noise Assessment prepared by Wilkinson Murray and dated 16 December 2020.	C	1. Complaints Register	No operational noise complaints were made during the audit period.	
F9	The Applicant must undertake short term noise monitoring in accordance with the Noise Policy for Industry, where valid data is collected within three months of commencement of use of each stage which results in an increase in student numbers.	NT	NA	Compliance with the requirements of this condition will be assessed in future operational audit periods.	
F10	The monitoring program must be carried out by an appropriately qualified person and a monitoring report must be submitted to the Planning Secretary within two months of commencement use of each substage (which results in an increase in student numbers) to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in the Construction and Operational Noise Assessment prepared by Wilkinson Murray and dated 16 December 2020.	NT	NA	Compliance with the requirements of this condition will be assessed in future operational audit periods.	
F11	Should the noise monitoring program required by Schedule 3 condition F10 identify any exceedance of the recommended noise levels referred to in Schedule 3 condition F8, the Applicant is required to implement appropriate noise attenuation measures so that operational noise levels do not exceed the recommended noise levels or provide attenuation measures at the affected noise sensitive receivers.	NT	NA	Compliance with the requirements of this condition will be assessed in future operational audit periods.	
Unobstructed Driveways and Parking Areas					
F12	All of the site's driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.	C	1. Site inspection	Driveways, footways and car spaces were clear of construction related material and equipment at the time of the site inspection.	
Operational Transport and Access Management Plan (OTAMP)					
F13	The OTAMP(s) approved under Schedule 3 condition E11 (as revised from time to time) must be: (a) implemented by the Applicant for the life of the development; and (b) monitored, reviewed and updated (if necessary) on an annual basis, to ensure operational transport impacts of the development are effectively managed and mitigated.	C	*1. Operational Transport and Access Management Plan* (201435 TAAA) 9 August 2022.	A copy of the OTAMP is available.	
Signposting					
F14	All works/regulatory signposting associated with the proposed development are to be at no cost to TfNSW or Council.	C	1. Site inspection	Adequate signposting observed during site investigation component of audit.	
Green Travel Plan (GTP)					
F15	The GTP required by Schedule 3 condition E10 of this consent, including the annual monitoring and review program require by Schedule 3 Condition E10(m), must be updated annually and implemented for the life of the development unless otherwise agreed by the Planning Secretary having regards to evidence as to why an annual review and update is no longer required.	NT	NA	Condition E10(m) is a new condition included in the consolidated consent for MOD 2. It is the Auditors interpretation that the requirement to comply with this condition will be required within one year of commencement of substage 4 operations and compliance will be confirmed in future independent environmental audits.	
Ecologically Sustainable Development					
F16	Unless otherwise agreed by the Planning Secretary, within six months of commencement of operation, Green Star certification must be obtained demonstrating the development achieves a minimum 5 star Green Star Design & As Built rating. If required to be obtained, evidence of the certification must be provided to the Certifier and the Planning Secretary. If an alternative certification process has been agreed to by the Planning Secretary under condition C27, evidence of compliance of implementation must be provided to the Planning Secretary and Certifier.	NT	NA	Compliance with the requirements of this condition will be assessed in future operational audit periods.	
Outdoor Lighting					
F17	Notwithstanding Schedule 3 condition D34, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide reasonable mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level. Details of outdoor lighting must also be provided to the CCC for information.	OFI	1. Installation Certificate (Class Electrical Services Pty Ltd, 1/06/2026) 2. Installation Certificate - Essential Fire Safety Measures (Class Electrical Services Pty Ltd, 19/06/2026) 3. Electrical Design Services - Design Certificate -CC3 (Shelmerdines Consulting Engineers, 8/05/2026)	Observations made during the site inspection confirmed the the plans listed in this condition appeared to be being implemented. Construction of substage 4 was near completion at the time of the audit with only minor works and landscaping being completed.	**OFI-02**
Various Operational Management Plans					
F18	The following operational management plans (and any updates to those plans), must be implemented and adhered to at all times by the Applicant following the issue of the relevant occupation certificate: (a) Operational Landscape Management Plan (Schedule 3 condition E31); (b) GTP (Schedule 3 condition E10); (c) Operational Transport Access Management Plan (Schedule 3 condition E11); (d) Boarding Accommodation Operational Management Plan (Schedule 3 condition E12); (e) Operation and Maintenance Plan (Schedule 3 condition E22); and (f) Operational Waste Management Plan (Schedule 3 condition E28).	C	1. Site inspection 2. Occupation Certificate (OC-26101) Pursuant to Part 6 of the EP&A Act (bm+g, 15/07/2026)	Observations made during the site inspection confirmed the the plans listed in this condition appeared to be being implemented. Construction of substage 4 was near completion at the time of the audit with only minor works and landscaping being completed. Compliance with the implementation of these plans will be confirmed in future operational audits.	
Chapel Carpark Access and Allocation					
F19	The nine car parking spaces within the Chapel carpark being delivered and operated during Substage 5 under Schedule 3 Condition B1, must be allocated to full-time staff of the school with similar and consistent arrival and departure times to ensure staff travel inbound in the morning and outbound in the afternoon. Time-based signage must be installed at the entrance to the access roadway to the Chapel carpark off Mount Pleasant Avenue to restrict car movements based on the time of day to prevent conflicting movements.	NT	NA	This condition relates to compliance requirements for a future substage. Compliance with e the requirement of this condition will be assessed in future independent environmental audits	
Cap on Year 12 Student Numbers - Substage 5					
F20	The increase of 150 students from Substage 4 to Substage 5 permitted under Schedule 3 Condition B1 must not result in any increase to the number of Year 12 students above 176 (Year 12 Baseline), unless and until the transport infrastructure works and minimum parking provisions required in Substage 6 under Schedule 3 Condition B1 have been fully completed and are operational.	NT	NA	This condition relates to compliance requirements for a future substage. Compliance with the requirement of this condition will be assessed in future independent environmental audits	

F21	During operation of Substage 5 under Schedule 3 Condition B1, the Applicant must: (a) maintain accurate records of Year 12 enrolments by cohort and submit an annual compliance report (including enrolment data) to the Planning Secretary from the determination date of SSD-8996-Mod-2, confirming compliance with the Year 12 Baseline as per Schedule 3 Condition F20; (b) notwithstanding the requirement of Schedule 3 Condition F20, the Year 12 Baseline can be varied by up to, but not more than 5%; (c) where the records required in F21(a) identifies that Year 12 enrolments are projected to exceed, or have exceeded, the Year 12 Baseline, the Planning Secretary is to be notified in writing within 14 days; and (d) where Year 12 Baseline has been exceeded and notice has been given as required by Schedule 3 Condition F21(c), reduce the Year 12 cohort enrolment to or below the Year 12 Baseline by the commencement of the next enrolment intake date, unless otherwise agreed by the Planning Secretary.	NT	NA	This condition relates to compliance requirements for a future substage. Compliance with e the requirement of this condition will be assessed in future independent environmental audits	
F22	The cap on Year 12 student numbers under Schedule 3 Condition F20 ceases to apply once the Substage 6 works under Schedule 3 Condition B1 have been fully completed and are operational.	NT	NA	This condition relates to compliance requirements for a future substage. Compliance with e the requirement of this condition will be assessed in future independent environmental audits	

Appendix F Site Inspection Photos

Photo 1: Rehabilitated construction office area

Photo 2: Landscaping and erosion and sediment controls

Photo 3: Landscaping

Photo 4: Landscaping and with evidence of rill erosion

Photo 5: Car park and electrical substation

Photo 6: Car park boundary fence

Photo 7: Landscaping

Photo 8: Driveway entrance to loading dock

Appendix G Independent Environmental Audit Action Plan

Loreto Normanhurst School Redevelopment
Independent Environmental Audit July 2026 Action Plan

Recommendation Identification	Condition No.	Requirement (Exact Wording)	Compliance Rating	IEA Finding	Proposed Recommendation / Action	Applicant Response	Proposed Action Due Date (if applicable)
NC-01	A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; (b) any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and (c) the implementation of any actions or measures contained in any such document referred to in (a) above.	NC	The letter dated 3 August 2026 stated that the previous IEA (27/08/25 - 27/02/26) was considered to generally satisfy the reporting requirements of the Consent and the IA PAR. The letter also requested the following items for future IEAs: 1. Site inspection to be conducted during the audit period in accordance with the IA PAR . - the site inspection for this IEA was undertaken in accordance with the IA PAR 2. The IEA report and RAR be published on the project website. - A copy of the report was confirmed as being published on the project website, **however section 4.3.2 of the IA PAR specifically requires the proponent to submit their response to the audit recommendations to the Department in a document separate to the final IEA report.** 3. A status update for all actions in the RAR be reported in the next IEA until all actions complete. - This IEA includes a review of the status of the recommendations made in the previous IEA report. 4. Following submission of the IEA report a review (and update if necessary) of strategies, plans, programs required under this consent be completed. - Document review /updates did not occur, however it is important to note that at the time of this audit, construction was complete and only minor defects work was being undertaken.	For all future audits, complete and submit responses to the audit recommendations to the Department in a separate document to the final IEA report.	Responses to the recommendations made int future audits for substages 5 and 6 will be submitted to the Department in a separate document to the independent audit report.	As required by the audit schedule outlined in the IA PAR
NC-02	A36	Within three months of: (a) the submission of a compliance report under Schedule 3 condition A38; (b) the submission of an incident report under Schedule 3 condition A32; (c) the submission of an Independent Audit under Schedule 3 condition D37; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under Schedule 3 condition A2 which requires a review the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	NC	Recommendations made in the previous IEA related to the review and /or update of documents/management plans etc, did not occur, however, construction was complete and only minor defects work was being undertaken at the time of this audit	Notify the Planning Secretary and the Certifier in writing that a review is being undertaken where triggered by this condition.	The Planning Secretary and Certifier will be notified in writing within three months of the submission of: - Submission of a compliance report under Schedule 3 condition A38 - Submission of an incident report under Schedule 3 condition A32 - Submission of an Independent Audit under Schedule 3 condition D37 - Approval of any modification of the conditions of this consent; or - The issue of a direction of the Planning Secretary under Schedule 3 condition A2 which requires a review the strategies, plans and programs required under this consent must be reviewed	Within 3 months of any of these items being required
NC-03	A38	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).	NC	The annual Operation Compliance Report for substages 1 - 3 (2025) remains outstanding. A letter form the Department in March 2026 approved the cessation of ongoing annual Operational Compliance Reporting for for Sub-stages 1 to 3. This approval did not include any detail to state that the outstanding 2025 report was no longer required. Therefore, compliance with this condition for substages 1 - 3 has not been met and the 2025 report remains outstanding. It is noted that the approval to cease compliance reporting does not include substage 4 (subject to this audit) and annual compliance reports for substage 4 will still be required in accordance with the Compliance Reporting Post Approval Requirements (2020).	1. Seek clarification from the Department whether the approval for the cessation of future compliance reporting for substages 1-3 includes the outstanding report for 2025. If the Department confirms the outstanding report is still required to be submitted: 2. Complete the Compliance report in accordance with the Compliance Reporting Post Approval Requirements (2020). 3. Submit the Operation Compliance Report for substages 1 - 3 (2025). 4. Publish the Operation Compliance Report within 60 days after the submission of the report to the Planning Secretary.	1. Request clarification in writing from the Department confirming whether the outstanding 2025 Operation Compliance Report is still required to be submitted. 2. If required, complete and submit the Operation Compliance Report 3. Publish the Operation Compliance Report within the 60 days after the submission of the report to the Planning Secretary.	1. 18 Spetmber2026
	A39	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.	NC	Section 2.1 Table 1 of the Compliance Reporting PAR, 2026 sets out the phase, timing and minimum frequency for compliance reporting. Operational compliance reports are required on an annual basis (at a minimum). An annual Operations Compliance Report was not completed for 2025 (substages 1-3) and remains outstanding.			2. Within two weeks of confirmation from the Department.
	A40	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	NC	Previous Operations Compliance Report dated 7/03/2024 was confirmed as being available on the Applicants website. An annual Operations Compliance Report was not completed for 2025 and remains outstanding and therefore has not been made available on the website within the specified timeframe			3. Within 60 days after the submission of the report to the Planning Secretary (if required).
NC-04	E3	The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	NC	Evidence was provided demonstrating the submission of documentation as required by this condition was submitted to the Planning Secretary, however it was outside of the seven day timeframe (Occupation certificate date being 15 July 2026).	Ensure all documentation given to the Certifier is provided to the Planning Secretary within seven days after the certifier accepts it.	All documentation given to the Certifier is provided to the Planning Secretary within seven days after the certifier accepts it for all future substages of the Project	Within 7 days after documents are accepted by the certifier

OFI-01	C14	Prior to the commencement of any construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary. The CEMP must include, but not be limited to, the following: (a) Details of: (i) hours of work; (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) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting; (vii) community consultation and complaints handling as set out in the Community Communication Strategy required by condition C10; (viii) the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; (b) Construction Traffic and Pedestrian Management Sub-Plan (condition C16); (c) Construction Noise and Vibration Management Sub-Plan (condition C17); (d) Construction Soil and Water Management Sub-Plan (condition C18); (e) Construction Waste Management Sub-Plan (condition C19); (f) an unexpected finds protocol for contamination and associated communications procedure; (g) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; (h) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site; (i) details of location of protective fencing (exclusion fence) to protect the significant vegetation on the southern side of the site; (j) details to demonstrate that the proposed exclusion fence on the site would not impinge on species movement within and adjoining the site; (k) details of all mitigation and management measures to ameliorate impacts on flora and fauna during the construction works as indicated in the BDAR Loreto Normanhurst Biodiversity Assessment Report (version 6), prepared by Eco Logical Australia and dated 16 December 2020.	OFI	A review of the CEMP (Buildcorp, Rev 04) confirmed that it adequately addressed the requirements of this condition. The March 2026 IEA identified an OFI with regard to updating the ESCP to update the ESCP to reflect the site conditions current at that time, this was not completed, however it is noted that construction is now complete. Observations made during the site inspection identified a small section of rill erosion occurring within a landscaped area adjacent to the driveway. Landscape defects works were occurring at the time of the site inspection.	Undertake repair work to rectify the erosion and implement additional measures to prevent it form re-occurring.	Defects works were completed after the site inspection. No further action required	NA
	C18	The Applicant must prepare a Construction Soil and Water Management Plan (CSWMP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landform 2004) commonly referred to as the 'Blue Book'; (c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (d) detail all off-Site flows from the Site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to, 1 in 5-year ARI.	OFI	A review of the CSWMP (TTW, Rev 2) confirmed that it adequately addressed the requirements of this condition. It is noted that construction of substage 4 is now complete. Observations made during the site inspection identified: - Landscaping defects work was being completed - Minor erosion occurring within a landscaped area adjacent to the driveway - coir logs installed in steep garden beds to minimise erosion during heavy rainfall			
	C21	Prior to the commencement of construction, the Applicant must install erosion and sediment controls and other soil and water management measures in accordance with the CSWMSP (Schedule 3 condition C18).	OFI	Observations made during the site inspection identified: - Landscaping defects works were being completed - Minor erosion occurring within a landscaped area adjacent to the driveway - coir logs installed in steep garden beds to minimise erosion during heavy rainfall			
	D23	All erosion and sediment control measures must be effectively implemented and maintained in accordance with the CSWMSP (Schedule 3 condition C17).	OFI	Construction was complete at the time of the site inspection, with minor internal building and landscaping defect works being completed for Substage 4 Observations on site confirmed: - Construction related ESC measures had been removed - Landscaped areas within steep terrain had coir logs in place and there was evidence of minor rill erosion in landscaped area adjacent to the driveway			
OFI-02	F17	Notwithstanding Schedule 3 condition D34, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide reasonable mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level. Details of outdoor lighting must also be provided to the CCC for information.	OFI	The Design certificate provided confirmed that lighting design was in accordance with relevant standards BASSIX and BCA requirements as well as complying with DA conditions A22 and A23. The installation certificate confirmed that all electrical work was completed in accordance with the relevant standards, BCA and BASIX requirements. Consultation received from a member of the CCC outlined concerns with the lighting for the the parking area stating strong lights on high poles kept on all night and the boarding house with lights on every night and that adequate screening has not been installed.	Undertake an investigation of lights being left on and glare impacts on adjacent residential properties: - Confirm hours and which lights are required to be on for parking areas and the boarding house - investigate additional screening that could be installed to reduce glare impacts such light shields, use of soft lighting	Look into the concerns with lightning and determine appropriate actions to be implemented	Within 3 months

Appendix H Consultation Records

From:	Brigid White
To:	Natalie Ross; Sandy Hoy; "Loreto Normanhurst Principal"; "EA Principal (eaprincipal@loretonh.nsw.edu.au)"; "Lynn Long"; "ddwyer@loretonh.nsw.edu.au"; "Amber Williams"; "Janelle McIntosh - Councillor"; "Sallianne McClelland - Councillor"; "Mary Gow"; "Moira Hutchinson"; "Paddy Rich"; "Bryan Skelly"; "Bhakti Stokes"; "Matthew Gee"; "Brian Swanepoel"
Cc:	Christopher Griffiths
Subject:	[External] - Re: Independent Environmental Audit of Loreto Boarding House construction
Date:	Tuesday, 30 June 2026 11:44:08 AM
Attachments:	image.png Outlook-efncnuve.png Outlook-snq4kv3k.png Loreto IEA Consultation letter July 2026.pdf

Dear LNSRCCC Member,

The fifth Independent Environmental Audit (IEA) of the Boarding House building works is currently underway. As part of this process, consultation is required to seek any feedback or comments for the audit team's consideration regarding key issues **within the scope of the IEA**. Further details are provided in the attached letter.

We invite you to direct any enquiries or submit feedback by close of business on **13 July 2026** to:

Chris Griffiths
Onterris
Phone: 1800 779 363
Email: chrisgriffiths@onterris.com

Kind Regards,
Brigid

Brigid White
Assistant Project Manager

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From: Brigid White <Brigid.White@ctpg.com.au>

Sent: Monday, 23 February 2026 14:41
To: Natalie Ross <Natalie.Ross@ctpg.com.au>; Sandy Hoy <sandy@parklandplanners.com.au>; 'Loreto Normanhurst Principal' <principal@loretonh.nsw.edu.au>; 'EA Principal (eaprincipal@loretonh.nsw.edu.au)' <eaprincipal@loretonh.nsw.edu.au>; 'Lynn Long' <llong@loretonh.nsw.edu.au>; 'ddwyer@loretonh.nsw.edu.au' <ddwyer@loretonh.nsw.edu.au>; 'Amber Williams' <awilliams@loretonh.nsw.edu.au>; 'Janelle McIntosh - Councillor' <JMcIntosh@hornsby.nsw.gov.au>; 'Sallianne McClelland - Councillor' <smcclelland@hornsby.nsw.gov.au>; 'Mary Gow' <randmgow@bigpond.com>; 'Moira Hutchinson' <fhutchi1@bigpond.net.au>; 'Paddy Rich' <PATRICK.RICH@det.nsw.edu.au>; 'Bryan Skelly' <Bryan.Skelly@wisau.com.au>; 'Bhakti Stokes' <bhaktis018@gmail.com>; 'Matthew Gee' <matthew@cbdcollege.edu.au>; 'Brian Swanepoel' <BrianSwanepoel@adventist.org.au>
Cc: Christopher Griffiths <cgriffiths@epicenvironmental.com.au>
Subject: Re: Independent Environmental Audit of Loreto Boarding House construction

Dear LNSRCCC Member,

The fourth Independent Environmental Audit (IEA) of the Boarding House building works is currently underway. As part of this process, consultation is required to seek any feedback or comments for the audit team's consideration regarding key issues **within the scope of the IEA**. Further details are provided in the attached letter.

We invite you to direct any enquiries or submit feedback by close of business on **Tuesday 3 March 2026** to:

Chris Griffiths
Epic Environmental
Phone: 1800 779 363
Email: cgriffiths@epicenvironmental.com.au

Kind Regards,
Brigid

Brigid White
Assistant Project Manager

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From: Natalie Ross <Natalie.Ross@ctpg.com.au>
Sent: Thursday, 21 August 2025 18:09
To: Sandy Hoy <sandy@parklandplanners.com.au>; 'Loreto Normanhurst Principal' <principal@loretonh.nsw.edu.au>; 'EA Principal (eaprincipal@loretonh.nsw.edu.au)' <eaprincipal@loretonh.nsw.edu.au>; 'Lynn Long' <llong@loretonh.nsw.edu.au>; 'ddwyer@loretonh.nsw.edu.au' <ddwyer@loretonh.nsw.edu.au>; 'Amber Williams' <awilliams@loretonh.nsw.edu.au>; 'Janelle McIntosh - Councillor' <JMcIntosh@hornsby.nsw.gov.au>; 'Sallianne McClelland - Councillor' <smcclelland@hornsby.nsw.gov.au>; 'Mary Gow' <randmgow@bigpond.com>; 'Moira Hutchinson' <fhutchi1@bigpond.net.au>; 'Paddy Rich' <PATRICK.RICH@det.nsw.edu.au>; 'Bryan Skelly' <Bryan.Skelly@wisau.com.au>; 'Bhakti Stokes' <bhaktis018@gmail.com>; 'Matthew Gee' <matthew@cbdcollege.edu.au>; 'Brian Swanepoel' <BrianSwanepoel@adventist.org.au>
Cc: Brigid White <Brigid.White@ctpg.com.au>
Subject: Independent Environmental Audit of Loreto Boarding House construction

Dear LNSRCCC Member,

The third Independent Environmental Audit (IEA) of the Boarding House building works is currently underway. As part of this process, consultation is required to seek any feedback or comments for the audit team's consideration regarding key issues **within the scope of the IEA**. Further details are provided in the attached letter.

We invite you to direct any enquiries or submit feedback by close of business on **Tuesday, 26 August 2025** to:

Chris Griffiths
Epic Environmental
Phone: 1800 779 363
Email: cgriffiths@epicenvironmental.com.au

Thanks,
Natalie

Natalie Ross
Associate Director

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From: Sandy Hoy <sandy@parklandplanners.com.au>
Sent: Thursday, February 27, 2025 9:47 AM
To: 'Loreto Normanhurst Principal' <principal@loretonh.nsw.edu.au>; 'EA Principal (eaprincipal@loretonh.nsw.edu.au)' <eaprincipal@loretonh.nsw.edu.au>; 'Lynn Long' <llong@loretonh.nsw.edu.au>; 'ddwyer@loretonh.nsw.edu.au' <ddwyer@loretonh.nsw.edu.au>; 'Amber Williams' <awilliams@loretonh.nsw.edu.au>; Natalie Ross <Natalie.Ross@ctpg.com.au>; Kelsie Tuck <Kelsie.Tuck@ctpg.com.au>; 'Hayley Kardash' <hkardash@urbis.com.au>; 'Janelle McIntosh - Councillor' <JMcIntosh@hornsby.nsw.gov.au>; 'Sallianne McClelland - Councillor' <smcclelland@hornsby.nsw.gov.au>; 'Mary Gow' <randmgow@bigpond.com>; 'Moira Hutchinson' <fhutchi1@bigpond.net.au>; 'Paddy Rich' <PATRICK.RICH@det.nsw.edu.au>; 'Bryan Skelly' <Bryan.Skelly@wisau.com.au>; 'Bhakti Stokes' <bhaktis018@gmail.com>; 'Matthew Gee' <matthew@cbdcollege.edu.au>; 'Brian Swanepoel' <BrianSwanepoel@adventist.org.au>
Subject: Independent Environmental Audit of Loreto Boarding House construction

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Dear LNSRCCC member,

CPTG has advised that the second Independent Environmental Audit (IEA) of the Boarding House building works is currently underway. As part of the requirements of this audit, consultation is required seeking any feedback or comment for the audit team's attention to any key issues within the scope of the IEA. The two letters attached provide further information.

Please make any enquiries to and/or send feedback or comment on the IEA by close of business on Monday 10 March 2025 to Chris Griffiths, Epic Environmental, ph. 1800 779 363, cgriffiths@epicenvironmental.com.au

Regards,
Sandy

Sandy Hoy
Chair, Loreto Normanhurst School Redevelopment Community Consultative Committee (SSD-8996)

ph. 0411 191 866

sandy@parklandplanners.com.au