



Seventh Sense
Sustainability Consultants

Independent Environmental Audit Report No. 2

Barker College
(SSD-31822612)

September 2026

7thsense.global

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EXECUTIVE SUMMARY

This Independent Environmental Audit has been prepared by Seventh Sense Sustainability Consultants (7th Sense), engaged by the Proponent, for the initial operational phase audit of Stage 1A of the Barker College development (SSD-31822612)

The development that is covered under this consent involves the staged redevelopment of Barker College, including concept approval for a Performing Arts and Exams Centre, a new maintenance building, and an Aquatics and Tennis Centre, together with Stage 1 detailed works that include minor demolition and tree removal, pedestrian and landscaping improvements, minor building works, an elevated walkway along C-Block, new pedestrian links, and rationalised internal pick-up/drop-off arrangements.

The development works that is subject to this second audit is limited to the operation of the completed minor construction works on the staircase and associated pathways and minor landscaping works, which combined comprise the Stage 1A works. This is in line with the Department's approved audit program for Stage 1A as detailed in Appendix F. At the time of this audit, the remainder of the Stage 1B and Stage 1C works, and other concept design plans for the development had not yet commenced.

The school is located at 91 Pacific Highway, Hornsby, within the Hornsby local government area, and will have a maximum capacity of 2,850 students and 480 full-time equivalent staff on campus at any one time.

The requirement for this audit is set out in Condition of Consent (CoC) D38 'Independent Environmental Audit' and the scope The scope of the audit includes the relevant conditions of consent applicable to the operational phase of Stage 1A, together with any relevant outstanding or ongoing requirements from earlier phases of the development.

The on-site audit inspection was conducted on 26 June 2026 and an assessment of compliance was subsequently conducted against 97 consent requirements triggered at the time of the initial operation of the completed Stage 1A works which resulted in the finding of six (6) non-compliances and five (5) observations, categorised into the following:

- Administrative requirements: five (5) non-compliances and two (2) observations.
- Technical requirements: one (1) non-compliance and three (3) observations.

The auditor notes that whilst most of the requirements for the operation of Stage 1A works have been met, because the works in Stage 1A are tied to and form part of the overall Stage 1 development, other operational management plan requirements have also been triggered and are required to be met and have in this instance failed to be addressed. The auditor recommends that the auditee engage with a compliance project manager or coordinator to ensure all consent requirements are tracked and complied with at all stages of the development.

That said, the auditor notes that at the time of the audit, there were no identified high-risk areas associated with the operation of Stage 1A minor works which had the potential to cause any significant environmental harm or adverse impact to the community or school students, staff and visitors.

The auditees were cooperative and helpful throughout the audit and were committed to implementing the necessary corrective actions immediately following the audit, and to making improvements in line with noted observations and recommendations.

1. INTRODUCTION

1.1 Project overview

The Barker College development involves concept approvals and Stage 1 works that comprise:

- Concept approval: Co-curricular Performing Arts & Exams Centre with basement parking; Aquatics & Tennis Centre (indoor pool and rooftop courts) with basement parking; and a new Maintenance building with associated parking.
- Stage 1 works: site establishment and minor demolition; elevated east-west walkway with viewing and accessibility improvements; landscaped civic-space upgrades; new north-south path links; rationalised internal pick-up/drop-off with footpath upgrades; and an increase to 2,850 students and 480 FTE staff.

The college is located at 91 Pacific Highway, Hornsby, within the Hornsby LGA, comprising 91 Pacific Highway (Lot 100 DP 1262386), 9 Clarke Road (Lot 100 DP 1232343), 27-31 Clarke Road (Lot 1 DP 857049), 5 Marillian Avenue (Lot 5 DP 226796), 7 Marillian Avenue (Lot 12 DP 200961), 30A Unwin Road (Lot 4 DP 236907), and 32A Unwin Road (Lot 6 DP 236907).

The project has a capital investment value of \$121,480,394 (excluding GST). Stage 1 is expected to generate about 25 construction jobs with no change to operational jobs, and the concept works are expected to generate about 85 construction jobs with no change to operational jobs. The Aquatics & Tennis Centre is planned to commence in Q1 2027 for about 24 months, and the Co-curricular Performing Arts & Exam Centre is planned to commence in Q1 2029 for about 24 months.

The site has an area of 168,462 sqm and the surroundings are: north to the Pacific Highway with heritage buildings, light industrial and other commercial uses and access to Waitara Station, with Hornsby Station further north; east to Unwin Road with mostly low-density housing, pockets of medium-density and commercial uses, and St Leo's Catholic College on the south-east boundary; and west to College Crescent, which provides internal campus access and runs roughly parallel to the Northern Rail Line.

The Stage 1A works relevant to this operational audit comprised construction of an external staircase, including:

- minor demolition and shrub removal
- pedestrian and landscape improvement
- construction of the staircase



Figure 1-1: Aerial Site – Barker College (Source: EIS, Barker College, Urbis, 2022)

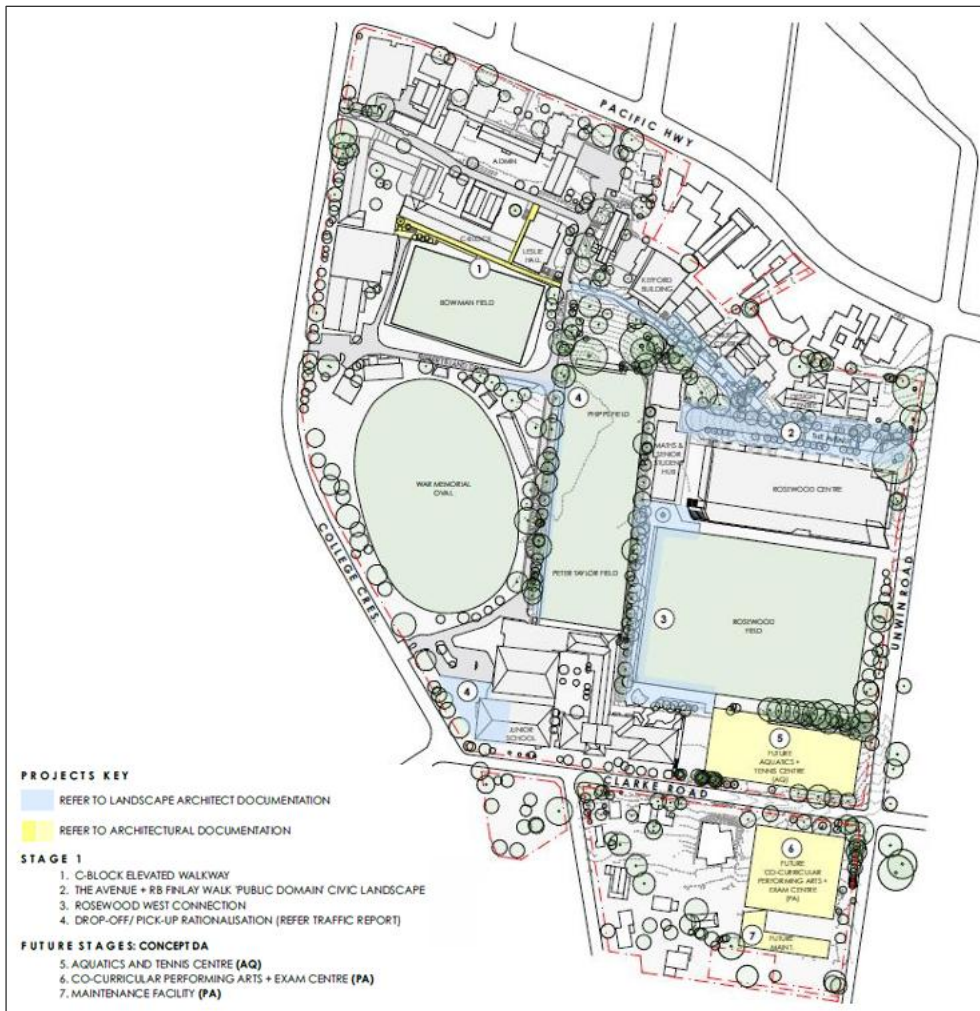


Figure 1-2: Proposed development layout (Source: EIS, Barker College, Urbis, 2022)

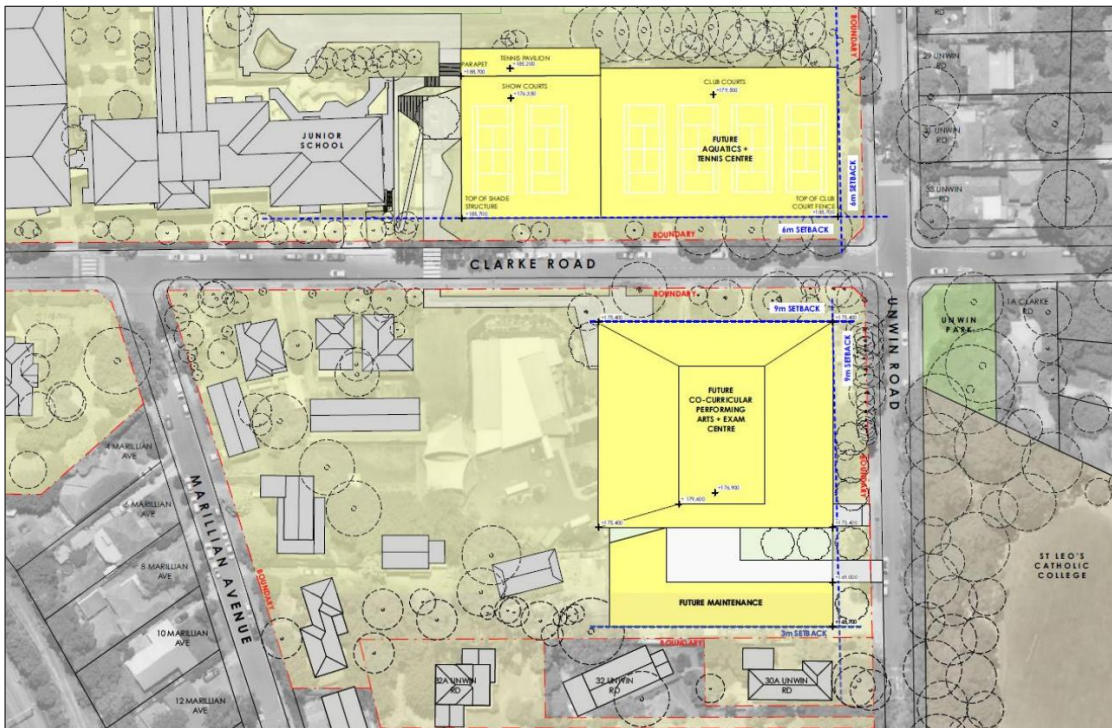


Figure 1-3: Proposed concept envelopes (Source: EIS, Barker College, Urbis, 2022)

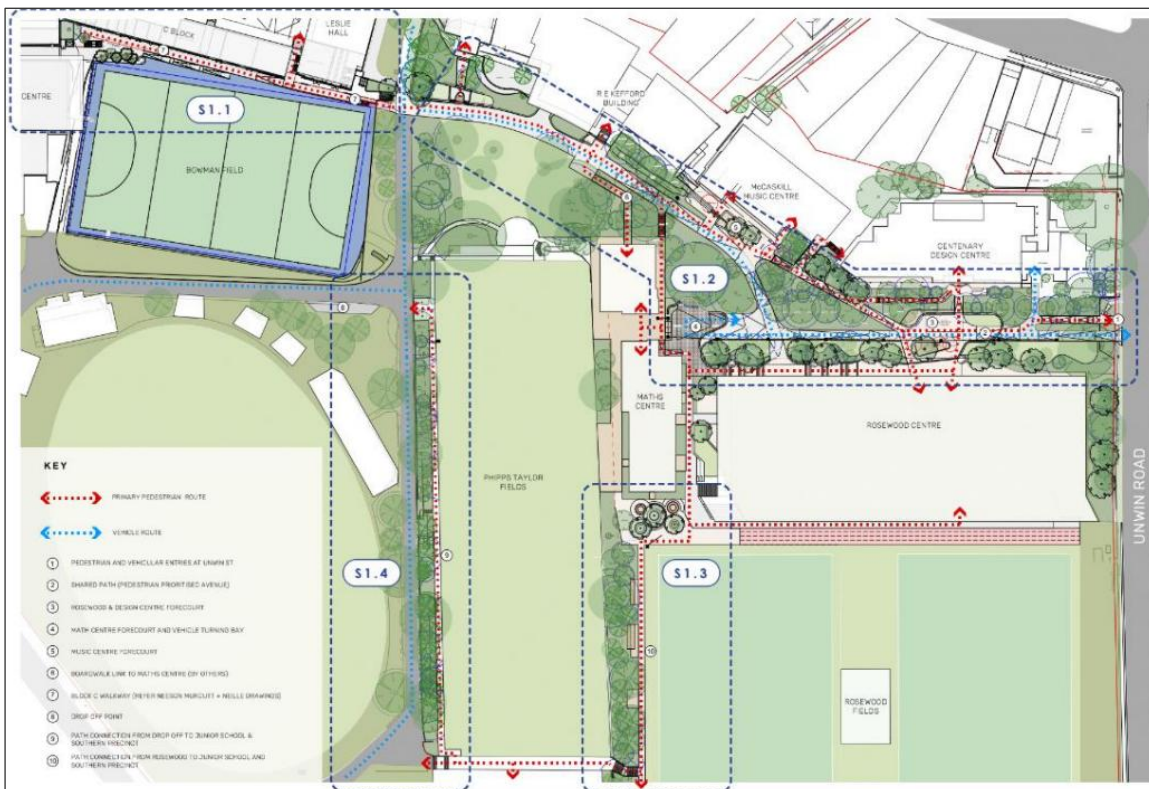


Figure 1-4: Stage 1 Works (Source: EIS, Barker College, Urbis, 2022)

1.2 Approval Requirements

Condition of Consent (CoC) D38 'Independent Environmental Audit' of SSD-31822612 sets out the requirement for undertaking this Independent Environmental Audit (IEA), and for the independent auditor to be appropriately qualified and experienced and approved by the Department. Additionally, CoCs D39 and D41 set out the responsibilities of the auditee with respect to responding to the audit report, submission to the Planning Secretary and making the audit report publicly available. The auditee, Barker College, was granted approval from DPHI for their nominated Independent Environmental Auditor, Ibrahim Awad, on 5/6/26. The approval is presented in Appendix B.

1.3 The Audit Team

In accordance with CoC D38 and Section 3.1 of the IAPAR, Independent Auditors must be suitably qualified, experienced, and independent of the Project, and appointed by the Planning Secretary. The approved Auditor is:

Ibrahim Awad (Lead Auditor): BSc, MEngSc, MEnvLaw, Exemplar Global Certified Lead Environmental Auditor (Certificate No 110720). Ibrahim has over 30 years of experience in environmental and compliance auditing and is also a Departmental approved Independent Environmental Auditor on major projects in NSW.

1.4 The Audit Objectives

The objective of this Independent Environmental Audit is to satisfy SSD-31822612 CoCs 38, 39, 40, 42 and 43 which state that:

D38. Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).

D39. 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,

D40. The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (2020), upon giving at least 4 weeks' notice (or timing) to the applicant of the date or timing upon which the audit must be commenced.

D41. 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 of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.

D42. 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.

1.5 Audit Scope

This second Independent Environmental Audit relates to the operational phase of the Stage 1A works covering the period between the date of notified commencement of operation of Stage 1A works on 16 January 2026 and the completion of the site inspection on 26/06/26 (the audit period).

The scope of this audit report covers Part A – Administrative Conditions, Part D – During Construction, Part E – Prior to the Issue of Occupation Certificate, and Part F – Post Occupation of the consent, and comprises:

- an assessment of compliance with:
 - all related conditions of consent for the period from the commencement of construction to the conduct of the on-site audit inspection;
 - all post approval and compliance documents prepared to satisfy the above conditions of consent
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit, and
 - feedback received from the Department, and other agencies on the environmental performance of the project during the audit period.
- a high-level assessment of whether the management plans and relevant subplans are adequate, and
- any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

2. AUDIT METHODOLOGY

2.1 Audit process

The Independent Environmental Audit (IEA) was conducted in accordance with AS/NZS ISO 19011.2019 - Guidelines for Auditing Management Systems and the methodology set out in the Department's IAPAR. An overview of the audit activities, as specified in AS/NZS ISO 19011, is presented in Figure 2.

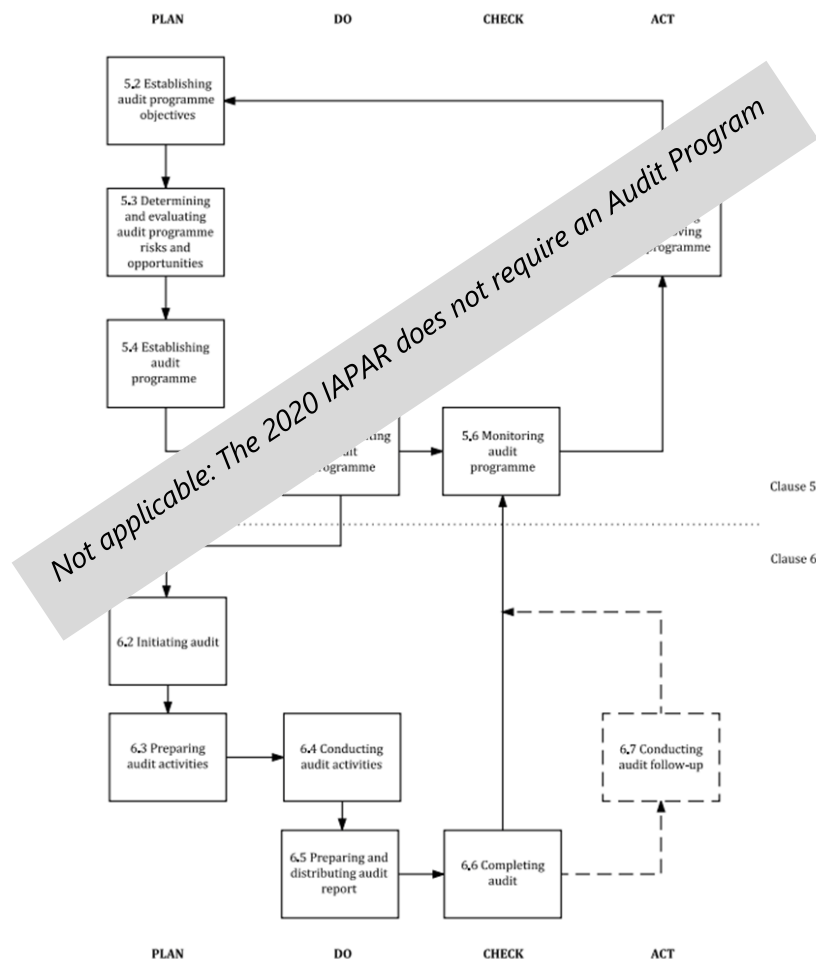


Figure 2: Audit activities overview (modified from AS/NZS ISO 19011). Subclause numbering refers to the relevant subclauses in the Standard.

2.2 Audit Process Detail

2.2.1 Audit initiation and scope development

Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the Auditee.
- Confirm the audit team and seek the Department's approval for nominated auditor.
- Confirm the audit purpose, scope and criteria.
- Consult with the Department on the audit scope.

The auditor consulted DPHI's Compliance Team (Sydney Metro) via email on 30/7/26 to obtain their input into the scope of the Independent Environmental Audit in accordance with Section 3.2 of the IAPAR. The consultation records are presented in Appendix C. A copy of the response by DPHI in their email dated 7/8/26 is provided in Appendix C.

2.2.2 Preparing Audit Activities

The Auditor performed a document review, prepared an audit plan, and prepared work documents (audit checklists) and distributed to the auditee's Project team in preparation for the Independent Environmental Audit.

The primary documents reviewed prior to and after the site visit are as follows:

- Development consent (SSD-31822612).
- Barker College Operational Management Plan, January 2024
- Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026
- Barker College Green Travel Plan, V03, The Transport Planning Partnership, 5/6/2026
- Remediation Action Plan, JK Environments, 29/09/2023
- Operational Traffic and Access Management Plan, V05, TTPP, 13/02/2024
- Green Travel Plan, V11, TTPP, 19/03/2024
- Staging Report, Final 02, Urbis, 13/03/2025
- Taylor Field & Junior School Stair Concepts, Rev C, 360 Degrees Landscape Architects, December 2024
- EIS, Report 1, Barker College, Urbis, 2022

2.2.3 Site Personnel Involved

The on-site audit activities took place on 26/6/26. The following personnel took part in the audit along with the auditor:

Barker College Team

Project Manager: Georgina Augustesen

gaugustesen@barker.nsw.edu.au

Ph. 0417 206 787

Auditee Consultant Representative – Urbis:

Planning Consultant: Georgia Gibson

ggibson@urbis.com.au

Ph. 02 8233 9900

2.2.4 Meetings

Opening and closing meetings were held between the Auditor and Project personnel on the day of the site inspection on 26/6/26.

During the opening meeting, held at the start of the 26/6/26 audit session, the objectives and scope of the Independent Environmental Audit, the resources required, and methodology to be applied were discussed.

At the closing meeting, held on 26/6/26, the preliminary audit findings were presented, additional information required was outlined, preliminary recommendations (as appropriate) were made, and post-audit corrective actions were confirmed.

2.2.5 Stakeholder Consultations

The auditor consulted with the Department on the audit scope on 30/7/26 and the Department responded on 7/8/26 with some requests for the auditor to consider as part of this audit.

The Department's requests and the auditor's response are detailed in the table below.

Ref No.	Department's request	Auditor's Response
1	Specifically review the actions and recommendations associated with the previous findings relating to	The auditee's implementation of the corrective actions and recommendations from the previous audit have been

Ref No.	Department's request	Auditor's Response
	Conditions D8 (Implementation of Management Plans) and D21 (Erosion and Sediment Control), and assess whether those matters have been adequately addressed;	reviewed and the status of actions taken are detailed in Table 3.1.
2	Clearly document how any issues raised through stakeholder consultation have been considered and addressed in the audit assessment; and	Hornsby Council was consulted in the first construction phase audit for Stage 1A and they noted there were no issues for consideration for the minor staircase work. (letter from Hornsby Council dated 18//25). There were no further stakeholder consultation requirements from the Department for this second operational audit for Stage 1A works of the staircase and minor pedestrian pathway and landscaping works associated with the staircase.
3	Assess all applicable consent conditions and assign an appropriate compliance status in accordance with the IAPAR 2020 (e.g. compliant, non-compliant or not triggered), consistent with the Department's determination letter dated 6 August 2026.	This has been completed in Appendix A for the conditions that have been triggered for the Stage 1A construction and operational works for Stage 1A only.
4	The Department also notes that the consultation request refers to an Operational Phase audit; however, it states that the subject of the audit is the construction of a minor staircase within the school grounds. Please clarify how the audit scope has been determined and whether the audit will assess compliance with all consent conditions relevant to the operational phase of Stage 1A.	This audit has been conducted in accordance with the Letter from the Department to Barker College entitled 'Concept Proposal and Stage 1 for Alterations and Additions to Barker College – Request to vary Independent Audit timing requirements' dated 11/7/25 – see Appendix F. The letter notes that an operation audit is to be conducted for Stage 1A works prior to 16/2/26. The proponent missed this date and has engaged the auditor to conduct this initial operational phase audit for Stage 1A works in June 2026. The letter notes that no further operation audit is required for Stage 1A works due to the minor scope of the works i.e. construction and operation of a staircase. The auditor notes this operation audit is conducted in accordance with the Department's letter and approved program and only covers those conditions triggered by Stage 1A works, which is the construction and operation of a staircase, and minor associated pedestrian pathway and landscaping. Any other conditions relating to Stages 1B, 1C and future concept design aspects of this development will be subject to future audits.

2.2.6 Interviews

The Auditor conducted interviews during the site inspection with key personnel involved in the Project operation, including those with responsibility for environmental management, to assist with verifying the compliance status of the development. All other communication was conducted remotely, which included detailed request for information and auditee responses to the request.

Audit interviews were conducted on 26/6/26 with the following people:

- Georgina Augustesen, Project Manager, Barker College
- Georgia Gibson, Planning Consultant, Urbis

2.2.7 Site inspection

An onsite inspection of the project was conducted by the auditor on 26/6/26 and included a visual inspection and interviews with key staff/stakeholders on the following areas:

- Staircase
- Brick work
- Pedestrian pathway
- Pathway lighting
- Drainage
- Signage
- Landscaping

Photos are presented in Appendix D.

2.2.8 Document review

The Independent Environmental Audit included investigation and review of project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement.

2.2.9 General Audit Findings

Independent Environmental Audit findings were based on verifiable evidence. The evidence included:

- relevant records, documents and reports

- interviews of relevant site personnel
- photographs
- agency consultations
- figures and plans, and
- site inspections of relevant locations, activities and processes.

2.2.10 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement using the descriptors from Table 2 of the IAPAR. These are replicated in Table 2 below.

Table 2: Compliance status descriptors

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

Observations and notes may also be made to provide context, identify opportunities for improvement or highlight positive initiatives.

Table 2-1: Additional Compliant status descriptors

Descriptor	Explanation
Opportunity for Improvement (OFI)	A suggestion or opportunity to implement good or better practice to improve effectiveness, further reduce exposure to risk or improve information management. When specifically stated as a Recommendation, a formal response and action plan are required.
Observation (OBS)	Documented requirement and/ or implementation issue which may not strictly affect required performance or compliance outcomes. Also termed a non-conformance (as opposed to non-compliance) in the industry, observations could be an early indication of potential non-compliance and/ or an adverse performance outcome.

2.2.11 Evaluation of post approval documentation

The Auditor assessed whether post approval documents:

- have been developed in accordance with the CoCs and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate, and

- have been implemented in accordance with the CoCs and all other environmental licences and approvals applicable to the Project (if any).

The adequacy of post approval documents was determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document.
- whether there are any opportunities for improvement.

2.2.12 Completing the audit

The Draft Independent Environmental Audit Report was distributed to the proponent to review and check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make the final findings or recommendations based on the facts presented.

3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

The requirements audited comprised all the conditions from Conditions of Consent of SSD-31822612 applicable to the works being undertaken, and selected mitigation measures and commitments from the following plans:

- Development consent (SSD-31822612).
- Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026
- Barker College Green Travel Plan, V03, The Transport Planning Partnership, 5/6/2026
- Barker College Operational Management Plan, January 2024
- Green Travel Plan, V11, TTPP, 19/03/2024
- Staging Report, Final 02, Urbis, 13/03/2025
- Taylor Field & Junior School Stair Concepts, Rev C, 360 Degrees Landscape Architects, December 2024
- EIS, Report 1, Barker College, Urbis, 2022

The evidence sighted against each requirement is detailed within Appendix A.

3.2 Non-compliance, Observations and Actions

This Section, including Table 3.1 and Table 3.2, presents the non-compliances and observations from the Independent Environmental Audit. Actions in response to each of the findings are also presented. Detailed findings against each requirement are presented in Appendix A.

Of the total 97 number of requirements audited six (6) non-compliances and five (5) observations, categorised identified with respect to the CoC. These relate to:

- Administrative requirements: five (5) non-compliances and two (2) observations.
- Technical requirements: one (1) non-compliance and three (3) observations.

There were no identified high-risk impacts associated with the operation of the Stage 1A works.

Table 3.1: Status of Previous Audit Report No. 1 Findings (Construction Phase Audit No. 1)

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
IA_13	A2	Non-compliance	<u>Requirement:</u> <i>The development may only be carried out:</i> <i>(a) in compliance with the conditions of this consent;</i> <i>(b) in accordance with all written directions of the Planning Secretary;</i> <i>(c) generally in accordance with the EIS, RtS and additional information; and</i> <i>(d) in accordance with the approved plans in the table below.</i> <u>Non-Compliance:</u> However, there were no sediment fences at the perimeter of the site as required in Section 4.1 'Soil Management' in the CEMP, and no details on how waste in the general waste bin and construction waste generated onsite was being managed in accordance with Section 5 – Waste Management and Table 3 – Construction Waste Management in the CEMP.	The auditee had responded to the initial audit recommendations by installing sediment fences on the site boundary fence. The construction works for Stage 1 A have now been completed and the boundary fencing removed. The auditee was also able to provide information on the waste contractor and their construction waste management policy and procedures of their waste contractor. Refer to auditee response from Audit No. 1. The auditor was able to verify satisfactory completion of works in the Audit No. 2 site inspection.	N/A	CLOSED

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
IA_35	A24	Non-compliance	<u>Requirement:</u> A24. 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	The auditee had responded to the initial audit recommendations by providing a complaints register and procedure has been updated to their website.	N/A	CLOSED

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			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 of each of the respective stages (where relevant). <u>Non-compliance:</u> There is no specific information on the project website on how to make a complaint, nor an updated complaints register.			

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			There are no regular reporting or monitoring requirements for Stage 1A minor works.			
IA_69	C12	Non-compliance	Requirement: <i>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:</i> <i>(a) Details of: (i) hours of work;</i> <i>(ii) 24-hour contact details of site manager;</i> <i>(iii) management of dust and odour to protect the amenity of the neighbourhood;</i> <i>(iv) stormwater control and discharge during construction;</i> <i>(v) groundwater management plan including measures to prevent groundwater contamination;</i> <i>(vi) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;</i> <i>(vii) community consultation and complaints handling as set out in the Community</i>	The construction phase of Stage 1A has now been satisfactorily completed and this requirement no longer applies. The auditor recommends the auditee address any outstanding matters in the CEMP for the next phase of Stage 1 developments.	N/A	CLOSED



Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			<i>Communication Strategy required by Schedule 3 condition C8;</i> <i>(viii) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and</i> <i>(ix) flood emergency procedures during construction works;</i> <i>(b) Construction Noise and Vibration Management Sub-Plan (see Schedule 3 condition C14);</i> <i>(c) Construction Traffic and Pedestrian Management Sub-Plan (see Schedule 3 condition C15);</i> <i>(d) an unexpected finds protocol for contamination, any required remediation (if relevant) and associated communications procedure;</i> <i>(e) construction flood emergency management procedures for the site including:</i> <i>(i) flood warning and notification procedures for construction workers on site; and</i> <i>(ii) evacuation and refuge protocols; and</i> <i>(f) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure.</i>			

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			<u>Non-compliance:</u> The CEMP does not include and/ or provide sufficient details on (v) Groundwater Management Plan and Flood Emergency Management Procedures (a) ix, e (i) and (ii). Additionally, the auditee has not provided evidence on how they have implemented the requirements of the Section Waste Management Plan in the CEMP as per (viii).			
IA_77	C20	Non-compliance	<u>Requirement:</u> <i>Prior to the commencement of construction, the Applicant describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 1-year Annual Recurrence Interval (ARI), 1 in 5-year ARI and 1 in 100-year ARI.</i> <u>Non-compliance:</u> The CEMP does not include any detail on how to manage flood flows for small and large sized events.	The Stage 1A works have now been completed. The auditor recommends any outstanding issues with the CEMP be addressed for any upcoming works for the remainder of Stage 1 developments.	Auditee To be addressed at next stage of development.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
IA_80	C23	Observation	<u>Requirement:</u> Prior to the commencement of any construction, the Applicant must engage a NSW EPA 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. <u>Observation:</u> The auditee has engaged a site auditor, though the engagement was following commencement of construction in June 2025.	Stage 1A works have been completed and this will only need to be addressed at the next stage of the development.	N/A	CLOSED
IA_83	C26	Non-Compliance	<u>Requirement:</u> <i>The updated Remediation Action Plan prepared by JK Environments dated 29 September 2023 (RAP) must be provided to the Planning Secretary for information, including the Interim Audit Advice and:</i> <i>(a) be prepared by a suitably qualified consultant;</i> <i>(b) be submitted to and be approved by the Site Auditor;</i> <i>(c) be supported by an Interim Audit Advice from an EPA-accredited Site Auditor certifying the updated RAP as appropriate prior to the commencement of remediation works.</i>	The RAP has been issued to the Planning Secretary. Update not required for Stage 1A	N/A	CLOSED

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			<u>Non-compliance:</u> The auditor could not find evidence of submission of this RAP to the Planning Secretary, nor submission to and approval from the Site Auditor, nor an Interim Advice from the Site Auditor certifying the RAP.			
IA_91	D8	Non-Compliance	<u>Requirement:</u> The Applicant must carry out the construction of the development in accordance with the most recent version of the submitted CEMP (including Sub-Plans), the endorsed CTPMP, and construction workers parking strategy. <u>Non-compliance:</u> The auditor notes that two requirements of the CEMP and sub-plans had not been met at the time of the on-site inspection and audit, the first relating to absence of sedimentation control at the boundary fence, and the other relating to management of construction waste.	The construction of Stage 1A has now been completed and actions taken to address these recommendations as per the auditee's response to Audit No. 1.	N/A	CLOSED
IA_104	D21.	Non-Compliance	<u>Requirement:</u> All erosion and sediment control measures must be effectively implemented and	The construction of Stage 1A has now been completed.	N/A	CLOSED

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			maintained in accordance with Schedule 3 condition Schedule 3 condition A1 and Schedule condition C19. <u>Non-compliance:</u> The CEMP includes erosion and sediment control requirements, including sediment fencing. However, during the site inspection, sediment fencing was not installed at the site boundaries as shown in photo in Appendix D.			
IA_108	D25.	Observation	<u>Requirement:</u> For the duration of construction works, the Applicant must implement, in accordance with the CEMP required by Schedule 3 condition C12 <u>Observation:</u> The auditor notes that CEMP does not include sufficient flood emergency management procedures or details for managing flood flows. However, the auditor also notes that flood risk and impact was very minimal at this site and for this stage of construction.	The Stage 1A works have been completed. The auditee will need to include a dedicated section on flood emergency management procedures or details for managing flows in the CEMP as per the requirements of this condition for the next stage of the development.	Auditee To be actioned for the next stage of the development.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
IA_115	D32	Observation	<u>Requirement:</u> 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. <u>Non-compliance:</u> The auditor notes that the mixed construction waste bin and records were being provided by the waste bin contractor. However, no evidence was provided.	The Stage 1A works have now been completed and the auditee has noted in their response that their waste contractor maintained these records and that the auditee will ensure that this requirement is met in the next stages of the development.	N/A	CLOSED
IA_119	D36	Observation	<u>Requirement</u> 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). <u>Observation</u> The auditee has engaged a site auditor, though the engagement was following commencement of construction in June 2025.	Stage 1A construction works did not require the input from a site auditor. This requirement will apply to the future construction stages and main works of the development.	N/A	CLOSED

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
IA_125	D42.	Observation	<u>Requirement</u> 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. <u>Observation</u> The auditee had submitted a response to Department on the IEA Report version 1 submitted dated 14/10/25 but will be required to submit a new response to this updated and correct version of the Report v1.1 dated 13/7/26.	The auditee submitted their response to Audit No. 1 to the Department on 14/10/25, which was within 2 months of the audit inspection as required. The auditee subsequently submitted an updated response to the revised and correct audit report v1.1 on 14/7/26.	N/A	CLOSED

Table 3.2: Audit findings and Actions (Operational Phase Audit No. 2)

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
IA_13	A2	Non-compliance	<u>Requirement:</u> <i>The development may only be carried out:</i> <i>(a) in compliance with the conditions of this consent;</i> <i>(b) in accordance with all written directions of the Planning Secretary;</i> <i>(c) generally in accordance with the EIS, RtS and additional information; and</i> <i>(d) in accordance with the approved plans in the table below.</i> <u>Non-Compliance:</u> Non-compliances were identified during this audit against Conditions A26, A27, A31, A32, and C1. Accordingly, the development was not fully carried out in compliance with the conditions of consent as required by Condition A2(a).	The auditee should address the individual non-compliances identified in this audit.	Auditee Within 8 weeks.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
IA_37	A26	Non-compliance	Requirement A26. The Applicant must submit evidence to and obtain approval from the Planning Secretary, within the 12 months of implementation of the OTAMP required by Schedule 3 condition E12 and the implementation of the GTP required by Schedule 3 condition E11 and then 5 consecutive years (at 12 months interval starting from the first year), demonstrating that: (a) the GTP has been implemented and that the proposed targets of mode of share have been achieved; or (b) alternative mode share targets have been agreed with the Planning Secretary and implemented; and (c) reduction in the car usage to the school has been achieved. Non-compliance:	Ensure future OTAMP/GTP implementation evidence is submitted to DPHI within the required 12-month timeframe.	Auditee For future reference and action.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			The updated OTAMP V03 and GTP V03, both dated 5 June 2026 and prepared by TTPP, were submitted to DPHI as implementation evidence under Condition A26. The DPHI letter dated 24 June 2026 confirms that the nominee of the Planning Secretary approved the updated OTAMP V03 and GTP V03 as implementation evidence under Condition A26 and agreed to the revised alternate mode share targets adopted in the updated GTP under Sub-condition A26(b). However, DPHI noted that the implementation evidence was not submitted for approval within 12 months of implementation of the OTAMP and GTP, as required by Condition A26. TTPP also advised that subsequent analysis and personnel changes within the study team resulted in an extensive delay in the completion of both the OTAMP and GTP.			
IA_38	A27	Non-compliance	Requirement A27. The Applicant must submit to the Planning Secretary the results of the audits required by Schedule 3 condition A25 (and the necessary mitigations / management measures implemented, if relevant), within 6 months of	Ensure future PUDO audit results are submitted to the Planning Secretary within 6 months of completing the audit.	Auditee For future reference and action.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			undertaking the audit, to verify the success of the Green Travel Plan (GTP) required to be prepared under Schedule 3 condition E11. <u>Non-compliance:</u> The OTAMP dated 5 June 2026 includes an audit of the PUDO zone undertaken by TTPP on 28 May 2025. DPHI noted that the PUDO zone site audit results were not submitted to the Department within 6 months of completing the audit, as required by Condition A27. TTPP also advised that subsequent analysis and personnel changes within the study team resulted in an extensive delay in the completion of both the OTAMP and GTP.			
IA-42	A31	Non-compliance	<u>Requirement</u> A31. The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major	Provide evidence that the non-compliances identified in IEA1 version 1 and version 1.1. were notified through the Major Projects Portal within 7 days.	Auditee Within 4 weeks.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			projects portal within seven days after they identify any non-compliance <u>Non-compliance:</u> IEA1 was undertaken on 13 August 2025 and the updated of the report v1.1 dated 13/7/26 identified 7 non-compliances. Evidence demonstrating that these non-compliances were notified to the Planning Secretary through the Major Projects Portal in accordance with Condition A31 has not been provided. Separately, Urbis prepared a letter to DPHI dated 23 June 2026 notifying the Planning Secretary of a non-compliance relating to the timing of the Stage 1A Operational Independent Environmental Audit. The letter also requested an amendment to the varied Independent Environmental Audit schedule. A Post Approval Form was provided confirming lodgement of this notification through the Major Projects Portal.			

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
IA-43	A32	Non-compliance	<u>Requirement</u> A32. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. <u>Non-compliance:</u> IEA1 was undertaken on 13 August 2025 and the updated of the report v1.1 dated 13/7/26 identified 7 non-compliances. Evidence demonstrating that these non-compliances were notified to the Planning Secretary through the Major Projects Portal in accordance with Condition A31 has not been provided.	Provide evidence that the non-compliance identified within IEA1 version 1 and version 1.1. were notified through the Major Projects Portal as well as the reasons for the non-compliances and actions to be taken.	Auditee Within 4 weeks.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			Separately, Urbis prepared a letter to DPHI dated 23 June 2026 notifying the Planning Secretary of a non-compliance relating to the timing of the Stage 1A Operational Independent Environmental Audit. The letter also requested an amendment to the varied Independent Environmental Audit schedule. A Post Approval Form was provided confirming lodgement of this notification through the Major Projects Portal.			
IA_48	C1	Non-Compliance	<u>Requirement</u> 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. <u>Non-compliance:</u> The notified commencement of operation of Stage 1A was 16 January 2026. The Planning Secretary was subsequently notified by Urbis in a letter dated 7 May 2026. The letter acknowledges that notification of commencement had not been provided at	The Applicant must notify the Planning Secretary in writing of the dates of the commencement of operation at least 48 hours before that date.	Auditee For future reference and action.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			least 48 hours before commencement of operation as required by Condition C1.			
IA_36	A25.	Observation	<u>Requirement</u> A25. A suitably qualified independent traffic consultant must undertake an audit of the PUDO zone, at 12 months of implementation of the OTAMP required by Schedule 3 condition E12 and rationalisation of the PUDO. The audit must: (a) include traffic counts at the PUDO zone during the AM and PM school peak periods; and (b) demonstrate that the proposed PUDO zone: (i) is adequate to cater for the school traffic; (ii) does not result in queuing across College Crescent and the adjoining intersections to the west of College Crescent; and (iii) does not impede the movement of passing vehicles or other emergency vehicles on College Crescent, Clarke Road and the surrounding roads.	Ensure future PUDO audits are undertaken within 12 months of implementation of the OTAMP.	Auditee For future reference and action.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			<u>Observation</u> The OTAMP dated 5 June 2026 includes an audit of the PUDO zone undertaken by TTPP on 28 May 2025 during the AM and PM school peak periods. The audit found that the PUDO zone was operating adequately, with queues contained within the school and no impediment to passing or emergency vehicles. However, DPHI noted that the PUDO zone audit was not undertaken within 12 months of implementation of the OTAMP, as required by Condition A25. The exact date of implementation of the OTAMP and PUDO zone was not provided in TTPP's response.			
IA_47	A36.	Observation	<u>Requirement</u> A36. Within three months of the notified date of commencement of operation of Stage 1, a Compliance Report must be submitted and approval obtained from the Certifier confirming that the development has been carried out in accordance with the conditions of this consent. <u>Observation</u>	Auditee to provide a copy of the Compliance Report covering Stage 1A of the works.	Auditee Within 4 weeks.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			Operation of the Stage 1A works commenced on 16 January 2026. Therefore, the requirement under Condition A36 to submit a Compliance Report within three months of commencement of operation has been triggered. Evidence of the Compliance Report covering Stage 1A of the works has not been provided to the auditor for verification.			
IA_52	D_41	Observation	<u>Requirement</u> D41. 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 of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary. <u>Observation</u>	Auditee to make sure they publish IEA V1.1 within 60 days of receiving this audit report.	Auditee For future reference and action.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			The auditee had submitted a response to Department on the IEA Report version 1 on 14/10/25 The Applicant has provided an updated response to the findings of Independent Environmental Audit Report No. 1, Version 1.1 dated 13/7/26. The updated auditee response was actioned on 14 July 2026. Auditee to make sure they publish IEA V1.1 within 60 days			
IA_53	D42	Observation	<u>Requirement</u> D42. 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. <u>Observation</u>	Auditee to ensure future Independent Audit Reports and responses are submitted to the Planning Secretary within two months of the audit site inspection.	Auditee For future reference and action.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			The Stage 1A construction IEA site inspection was undertaken on 13 August 2025. The corresponding IEA report was submitted to the Department on 5 May 2026, which was outside the two-month timeframe required by Condition D42. In the letter dated 30/7/2026 Urbis advised that the delay was due to a transition in project management responsibilities and administrative issues associated with the transfer of the Major Projects Portal account. Following issue of the updated Independent Environmental Audit Report No. 1, Version 1.1 dated 13 July 2026, the Applicant provided an updated response to the Department addressing the findings, dated 14 July 2026.			
IA_75	E21.	Observation	<u>Requirement</u> E21. Prior to the issue of any relevant occupation certificate, the Applicant must prepare and submit to the Certifier for approval, and Operational Landscape Management Plan, to manage the revegetation and landscaping on-site, to the satisfaction of the Certifier. The plan must describe the ongoing monitoring and	Auditee to provide evidence submission of an Operational Landscape Management Plan.	Auditee Within 4 weeks.	OPEN

Item	Ref (CoC)	Type	Details of Requirement and Audit Finding	Proposed or completed action	By whom and by when	Status / Auditee Response
			maintenance measure to manage revegetation and landscaping. <u>Observation</u> The Occupation Certificate package includes a Certificate Register confirming that the finished landscaping was completed in accordance with the approved Development Consent (SSD-31822612 Conditions E20 and E21) and the approved Construction Certificate drawings, and was certified by 360 Degrees Landscape Architects Pty Ltd on 19 September 2025. However, Operational Landscape Management Plan has not been provided			

3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents

The adequacy of post approval documents must be determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document.
- whether there are any opportunities for improvement.

A review was conducted of the:

- Development consent (SSD-31822612).
- Barker College Operational Management Plan, January 2024
- Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026
- Barker College Green Travel Plan, V03, The Transport Planning Partnership, 5/6/2026 EIS, Report 1, Barker College, Urbis, 2022
- Barker College Operational Management Plan, February 2024
- Remediation Action Plan, JK Environments, 29/09/2023
- Operational Traffic and Access Management Plan, V05, TTPP, 13/02/2024
- Green Travel Plan, V11, TTPP, 19/03/2024
- Staging Report, Final 02, Urbis, 13/03/2025
- Taylor Field & Junior School Stair Concepts, Rev C, 360 Degrees Landscape Architects, December 2024

3.3.1 Environmental Management Plans

The Operational Management Plan (OMP) was assessed against the correlated conditions of consent and were generally found to be in accordance with the requirements of those conditions.

The OMP is largely sufficient in helping to guide the auditee in the effective management of environmental risks and prevention of environmental harm. Any deficiencies in the plans have been highlighted in Table 3 and Appendix A.

3.4 Summary of notices from agencies

To the Auditors knowledge no formal notices were issued by the Department during the audit period in relation to the non-compliances.

3.5 Complaints

The auditor has consulted the auditee and reviewed the project's complaints register and as of the time of the site inspection on 26/6/26, there were no complaints registered or recorded since the commencement of operation of the development.

3.6 Incidents

There have been no incidents recorded and/ or reported by the auditee for the period since the commencement of operation up until the date of the site inspection on 26/6/26.

3.7 Actual versus predicted impacts

The auditor notes that for the limited Stage 1A staircase works completed and operational at the time of this first operational phase audit and that were the subject of the onsite inspection, there were no actual adverse environmental impacts not already predicted in the EIS.

4. CONCLUSION

This Audit Report presents the findings for the first and only operational phase Independent Environmental Audit required for Stage 1A of the Barker College development (SSD-31822612), covering the period between the notified commencement of operation of the staircase on 16/1/26 and the completion of the site inspection on 26/6/26 (the audit period).

Of the total 97 number of requirements audited six (6) non-compliances and five (5) observations, categorised identified with respect to the CoC. These relate to:

- Administrative requirements: five (5) non-compliances and two (2) observations.
- Technical requirements: one (1) non-compliance and three (3) observations.

The auditor notes that whilst most of the requirements for the operation of Stage 1A works have been met, because the works in Stage 1A are tied to and form part of the overall Stage 1 development, other operational management plan requirements have also been triggered and are required to be met and have in this instance failed to be addressed. The auditor recommends that the auditee engage with a compliance project manager or coordinator to ensure all consent requirements are tracked and complied with at all stages of the development.

That said, the auditor notes that there were no identified high-risk areas associated with the operation of Stage 1A minor works which had the potential to cause any significant environmental harm or adverse impact to the community or school students, staff and visitors.

The Auditor would like to thank the auditee Barker College and their main planning consultant Urbis for their high level of cooperation and assistance during the Independent Audit.

APPENDIX A: Audit Checklist

Table 1: Barker College - Independent Environmental Audit No. 2 (SSD-31822612)

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
<i>Relevant conditions and requirements from: SSD-31822612 (Schedule 2: CONDITIONS OF CONSENT FOR CONCEPT PROPOSAL, 20/12/23).</i>				
PART A: ADMINISTRATIVE CONDITIONS				
Determination of Future Applications				
IA_01	A1. In accordance with section 4.22(4) of the EP&A Act all development under the Concept Proposal must be subject of future development application(s), other than the development of Stage 1 that is subject to the conditions in Schedule 3.	Audit interview and on-site inspection on 26/6/26.	No works under the concept proposal have yet been commenced.	Not triggered
IA_02	A2. The determination of future development application(s) associated with the Concept Proposal is to be generally consistent with the terms of development consent SSD-31822612 as described in Schedule 1 and subject to the conditions in Parts A and B, Schedule 2.	Audit interview and on-site inspection on 26/6/26.	No works under the concept proposal have yet been commenced.	Not triggered
Terms of Consent				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_03	A3. The development (other than the development of Stage 1 that is subject to the conditions of consent in Schedule 3) 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; and (c) generally in accordance with the Environmental Impact Statement (EIS), Response to Submissions (RtS) and additional information; and (d) in accordance with the approved plans in the table below:	Audit interview and on-site inspection on 26/6/26.	No works under the concept proposal have yet been commenced.	Not triggered
IA_04	A4. 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 Department regarding compliance with this approval; and	Audit interview and on-site inspection on 26/6/26.	No directions have been received from the Planning Secretary.	Not triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(c) the implementation of any actions or measures contained in any such document referred to in Schedule 2 condition A4(a).			
IA_05	A5. The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in Schedule 2 condition A3(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in Schedule 2 condition A3(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Audit interview and on-site inspection on 26/6/26.	No directions have been received from the Planning Secretary	Not triggered
Limits of Consent				
IA_06	A6. This consent lapses five years after the date of consent unless the Stage 1 works, identified in Schedule 1 of this development consent, have physically commenced.	Audit interview and on-site inspection on 26/6/26.	Commencement of construction of Stage 1 works was on 17 June 2025, and therefore five years has not yet lapsed.	Not triggered
IA_07	A7. This approval does not allow any components of the Concept proposal to be carried out without further approval or consent being obtained from the relevant consent authority, except the Stage 1 component identified in Schedule 1 of this development that is subject to the conditions of consent in Schedule 3.	Audit interview and on-site inspection on 26/6/26.	No works in the Concept Proposal have been commenced.	Not triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Planning Secretary as Moderator				
IA_08	A8. In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.	Audit interview and on-site inspection on 26/6/26.	There were no disputes arising during the audit period.	Not triggered
Legal Notices				
IA_09	A9 Any advice or notice to the consent authority must be served on the Planning Secret.	Audit interview and on-site inspection on 26/6/26.	There was no advice or notice served during the audit period.	Not triggered
Student Number				
IA_10	A10. The maximum student and staff population permitted at the school at any one time must not exceed 2850 students (258 additional) and 480 full time equivalent staff	Audit interview and on-site inspection on 26/6/26. Letter from Barker College to Planning Secretary dated 9/10/25 confirming 2763 students and 470 staff.	The number of students and staff did not exceed those specified in this requirement.	Compliant
ADVISORY NOTES				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_11	A11. All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	Audit interview and on-site inspection on 26/6/26.	There were no licenses, permits or approvals required to be obtained for Stage 1A works commenced during the audit period.	Not triggered
Relevant conditions and requirements from: SSD-31822612 (Schedule 3: CONDITIONS OF CONSENT FOR STAGE 1 WORKS, 20/12/23).				
PART A: ADMINISTRATIVE CONDITIONS				
Obligation to Minimise Harm to the Environment				
IA_12	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.	Audit interview and on-site inspection on 26/6/26.	There was no evidence of any adverse environmental harm resulting from the operation of the minor Stage 1A works covered in this audit.	Compliant
Terms of Consent				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_13	A2. The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS, RtS and additional information; and (d) in accordance with the approved plans in the table below:	Audit interview and on-site inspection on 26/6/26.	The operation of the minor Stage 1A works completed at the time of the onsite inspection (namely construction of new stairway and associated pathway and landscaping) were mostly in accordance with the requirements of this condition. <u>Non-Compliance:</u> Non-compliances were identified during this audit against Conditions A26, A27, A31, A32, C1. Accordingly, the development was not fully carried out in compliance with the conditions of consent as required by Condition A2(a).	Not Compliant
IA_14	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;	Audit interview and on-site inspection on 26/6/26.	There were no directions issued by the Planning Secretary during the audit period.	Not triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(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 Schedule 3 condition A3(a) above.			
IA_15	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)(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in Schedule 3 condition A2(c)(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Audit interview and on-site inspection on 26/6/26.	There was no directions issued by the Planning Secretary during the audit period	Not triggered
Limits of Consent				
IA_16	A5. This consent lapses five years after the date of consent unless work is physically commenced.	Audit interview and on-site inspection on 26/6/26.	Commencement of construction of Stage 1A works was on 17 June 2025, and therefore five years has not yet lapsed.	Not triggered
Student numbers				
IA_17	A6. This maximum student and staff population permitted at the school at any one time must not exceed 2850 students and 480 full time equivalent staff.	Audit interview and on-site inspection on 26/6/26.	The number of students and staff did not exceed those specified in this requirement.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Letter from Barker College to Planning Secretary dated 9/10/25 confirming 2763 students and 470 staff. Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026		
IA_18	A7. No student increase beyond the existing enrolment of 2592 students within the site must occur, until the applicant submits evidence to and obtains approval from the Planning Secretary demonstrating that: (a) the OTAMP has been prepared and implemented in accordance with condition Schedule 3 condition E12; (b) the Green Travel Plan (GTP) has been prepared in accordance with Schedule 3 condition E11; (c) completion of the rationalisation of the pick-up/drop-off (PUDO) areas including all physical and management measures proposed in Stage 1; and (d) the provision of 438 operational car parking spaces (+ 49 car spaces within the Kurrajong Prep School used as PUDO spaces during AM and PM school peak hours) within the site.	Audit interview and on-site inspection on 13/8/25. Letter from Barker College to Planning Secretary dated 9/10/25 confirming 2763 students and 470 staff. Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026	The number of students and staff did not exceed those specified in this requirement.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Prescribed Conditions				
IA_19	A8. The Applicant must comply with all relevant prescribed conditions of development consent under Part 4, Division 2 of the EP&A Regulation.	Audit interview and on-site inspection on 26/6/26.	There were no prescribed conditions relating to the operation of Stage 1A of the development that is the subject of this audit.	Not triggered
Planning Secretary as Moderator				
IA_20	A9. 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 Stage 1 of the development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.	Audit interview and on-site inspection on 26/6/26.	The auditor was not aware of any dispute arising during the audit period.	Not triggered
Evidence of Consultation				
IA_21	A10. 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:	Audit interview and on-site inspection on 26/6/26.	There were no conditions or management plans requiring further consultation for the operation of Stage 1A minor works.	Not triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(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.			
Staging				
IA_22	A11. 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	Audit interview and on-site inspection on 26/6/26. Barker College: SSDA Projects, The significant Development Application, Rev 2, 5/9/23 Staging Report Barker College– Final 02, Urbis dated 13/03/2025. Letter of approval - Department of Planning, Housing and Infrastructure to Urbis - dated 19/03/2025 (reference: SSD-31822612-PA-6)	The auditee plans to construct and operate the development in stages and has submitted a Staging Report to the Department more than one month prior to the commencement of construction (i.e. on 13/3/25 and approval granted by the Department in the letter dated 19/3/25). Commencement of construction of Stage 1A works was on 17 June 2025.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_23	A12. A Staging Report prepared in accordance with condition A11 must: (a) if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; (b) if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when the operation of each stage will commence and finish (if relevant); (c) specify how compliance with conditions will be achieved across and between each of the stages of the project; (d) specify how compliance with independent auditing requirements will be achieved across and between each of the operational stages of the project; and (e) set out mechanisms for managing any cumulative impacts arising from the proposed staging.	Audit interview and on-site inspection on 26/6/26. Staging Report Barker College– Final 02, Urbis dated 13/03/2025 Letter of approval - Department of Planning, Housing and Infrastructure to Urbis - dated 19/03/2025 (reference: SSD-31822612-PA-6). Letter of approval – Department of Planning, Housing and Infrastructure to Barker College relating to: Request to Vary Independent Audit Timing Requirements, dated 11/7/25.	The Staging Report details the staging works as required in this condition. Further, as there will be a significant gap of no construction activity between the Stage 1A works and Concept Proposal works, the auditee has sought and attained approval from the Department to pause the 52 week interval Independent Environmental Audit requirements until commencement of future staged construction works.	Compliant
IA_24	A13. Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary	Audit interview and on-site inspection on 26/6/26.	The auditor notes that the operation works for Stage 1A have been carried out in accordance with the Staging Report.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Staging Report Barker College– Final 02, Urbis dated 13/03/2025 Letter of approval - Department of Planning, Housing and Infrastructure to Urbis - dated 19/03/2025 (reference: SSD-31822612-PA-6)		
IA_25	A14. Where construction is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report including independent auditing requirements.	Audit interview and on-site inspection on 26/6/26. Staging Report Barker College– Final 02, Urbis dated 13/03/2025 Letter of approval - Department of Planning, Housing and Infrastructure to Urbis - dated 19/03/2025 (reference: SSD-31822612-PA-6)	The auditor notes that the operation of Stage 1A have been carried out in accordance with the terms of this consent.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Letter of approval – Department of Planning, Housing and Infrastructure to Barker College relating to: Request to Vary Independent Audit Timing Requirements, dated 11/7/25.		
Staging, Combining and Updating Strategies, Plans or Programs				
IA_26	A15. 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	Audit interview and on-site inspection on 26/6/26. Staging Report Barker College– Final 02, Urbis dated 13/03/2025 Letter of approval - Department of Planning, Housing and Infrastructure to Urbis - dated 19/03/2025 (reference: SSD-31822612-PA-6)	The auditor confirms the auditee has been submitting required strategies/management plans in accordance with the requirements of this condition.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	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).			
IA_27	A16. Any updated strategy, plan or program prepared in accordance with Schedule 3 condition A15, where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary	Audit interview and on-site inspection on 26/6/26.	There were no updates to any strategies, plans or programs for this audit period.	Not triggered
IA_28	A17. 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.	Audit interview and on-site inspection on 26/6/26.	There were no updates to any strategies, plans or programs for this audit period.	Not triggered
IA_29	A18. 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.	Audit interview and on-site inspection on 26/6/26.	There were no updates to any strategies, plans or programs for this audit period.	Not triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
External Walls and Cladding				
IA_30	A19. Any external wall or cladding including proposed additions to existing buildings, as relevant to the Stage 1 works, must comply with the relevant requirements of the BCA.	Audit interview and on-site inspection on 26/6/26. Structural Design Certificate – 250617 , Barker College, issued by Gemstrux Consulting Engineers, dated 17/06/2025. Structural Drawings – Barker College, prepared by Gemstrux Consulting Engineers, dated 04/06/2025 (approved by J.M.B.E Construction)	There are no external wall or cladding associated with the Stage 1A minor works that were subject to this audit.	Not triggered
Structural Adequacy				
IA_31	A20. All new buildings and structures that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.	Audit interview and on-site inspection on 26/6/26.	The auditor notes that the Structural Design Certificate verifies compliance with the BCA.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Structural Design Certificate – 250617 , Barker College, issued by Gemstrux Consulting Engineers, dated 17/06/2025. Structural Drawings – Barker College, prepared by Gemstrux Consulting Engineers, dated 04/06/2025 (approved by J.M.B.E Construction)		
Applicability of Guidelines				
IA_32	A21. 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.	Audit interview and on-site inspection on 26/6/26.	The auditor notes that reference to relevant guidelines and related assessment of compliance are as of the date of this consent.	Compliant
IA_33	A22. 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.	Audit interview and on-site inspection on 26/6/26.	The auditor notes that no directions have been issued by the Planning Secretary for ongoing monitoring or management as of the date of this audit.	Not triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_34	A23. Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, Site audit report and independent auditing.	Audit interview and on-site inspection on 26/6/26. Letter of approval of Auditor - Department of Planning, Housing and Infrastructure to Urbis - dated 27/06/2025 Post Approval Form_20250605042349 Email confirmation - DPE - acknowledging submission of the Post Approval form dated 05/06/2025.	There are no requirements for monitoring or environmental audit for Stage 1A works.	Not triggered
Access to Information				
IA_35	A24. 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:	Audit interview and on-site inspection on 26/6/26. Building for the Future – Barker College - available on Barker College website https://www.barker.college/about-barker/our-master-plan/	The auditee has details of the development on their project website, as well as how to make a complaint.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(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	(a)(i) Copy of documents in the table in Sch 3, A2		

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(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 of each of the respective stages (where relevant).			
Post approval traffic monitoring				
IA_36	A25. A suitably qualified independent traffic consultant must undertake an audit of the PUDO zone, at 12 months of implementation of the OTAMP required by Schedule 3 condition E12 and rationalisation of the PUDO. The audit must: (a) include traffic counts at the PUDO zone during the AM and PM school peak periods; and (b) demonstrate that the proposed PUDO zone: (i) is adequate to cater for the school traffic; (ii) does not result in queuing across College Crescent and the adjoining intersections to the west of College Crescent; and (iii) does not impede the movement of passing vehicles or other emergency vehicles on College Crescent, Clarke Road and the surrounding roads.	Audit interview and on-site inspection on 26/6/26. Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026 Rev Table_A25-A27 Post Approval Traffic Monitoring (TTPP response 260605) 20443-R08V03-260605-OTAMP (with Track Changes)	The OTAMP dated 5 June 2026 includes an audit of the PUDO zone undertaken by TTPP on 28 May 2025 during the AM and PM school peak periods. The audit found that the PUDO zone was operating adequately, with queues contained within the school and no impediment to passing or emergency vehicles. However, DPHI noted that the PUDO zone audit was not undertaken within 12 months of implementation of the OTAMP, as required by Condition A25. The exact date of implementation of the OTAMP and PUDO zone was not provided in TTPP's response.	Observation

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Letter from DPHI, Concept Proposal and Stage 1 for Alterations & Additions to Barker College (SSD-31822612) Post Approval Traffic Monitoring Documentation, Conditions A25, A26 & A27		
IA_37	A26. The Applicant must submit evidence to and obtain approval from the Planning Secretary, within the 12 months of implementation of the OTAMP required by Schedule 3 condition E12 and the implementation of the GTP required by Schedule 3 condition E11 and then 5 consecutive years (at 12 months interval starting from the first year), demonstrating that: (a) the GTP has been implemented and that the proposed targets of mode of share have been achieved; or (b) alternative mode share targets have been agreed with the Planning Secretary and implemented; and (c) reduction in the car usage to the school has been achieved.	Audit interview and on-site inspection on 26/6/26. Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026 Barker College Green Travel Plan, V03, The Transport Planning Partnership, 5/6/2026 Rev Table_A25-A27 Post Approval Traffic Monitoring (TTPP response 260605)	The updated OTAMP V03 and GTP V03, both dated 5 June 2026 and prepared by TTPP, were submitted to DPHI as implementation evidence under Condition A26. The DPHI letter dated 24 June 2026 confirms that the nominee of the Planning Secretary approved the updated OTAMP V03 and GTP V03 as implementation evidence under Condition A26 and agreed to the revised alternate mode share targets adopted in the updated GTP under Sub-condition A26(b).	Not Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		20443-R08V03-260605-OTAMP (with Track Changes) Letter from DPHI, Concept Proposal and Stage 1 for Alterations & Additions to Barker College (SSD-31822612) Post Approval Traffic Monitoring Documentation, Conditions A25, A26 & A27	However, DPHI noted that the implementation evidence was not submitted for approval within 12 months of implementation of the OTAMP and GTP, as required by Condition A26. TTPP also advised that subsequent analysis and personnel changes within the study team resulted in an extensive delay in the completion of both the OTAMP and GTP.	
IA_38	A27. The Applicant must submit to the Planning Secretary the results of the audits required by Schedule 3 condition A25 (and the necessary mitigations / management measures implemented, if relevant), within 6 months of undertaking the audit, to verify the success of the Green Travel Plan (GTP) required to be prepared under Schedule 3 condition E11.	Audit interview and on-site inspection on 26/6/26. Barker College Green Travel Plan, V03, The Transport Planning Partnership, 5/6/2026 Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026	The OTAMP dated 5 June 2026 includes an audit of the PUDO zone undertaken by TTPP on 28 May 2025. DPHI noted that the PUDO zone site audit results were not submitted to the Department within 6 months of completing the audit, as required by Condition A27.	Not Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Rev Table_A25-A27 Post Approval Traffic Monitoring (TTPP response 260605) 20443-R08V03-260605-OTAMP (with Track Changes) Letter from DPHI, Concept Proposal and Stage 1 for Alterations & Additions to Barker College (SSD-31822612) Post Approval Traffic Monitoring Documentation, Conditions A25, A26 & A27	TTPP also advised that subsequent analysis and personnel changes within the study team resulted in an extensive delay in the completion of both the OTAMP and GTP.	
Compliance				
IA_39	A28. 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.	Audit interview and on-site inspection on 26/6/26. Confirmation Letter from Barker College - dated 11/06/2025	The auditor notes that the employees and contractors interviewed at the time of the onsite inspection were aware of the requirements of this consent.	Compliant
Incident Notification, Reporting and Response				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_40	A29. 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.	Audit interview and on-site inspection on 26/6/26.	There were no incidents reported during the audit period.	Not triggered
IA_41	A30. Subsequent notification must be given, and reports submitted in accordance with the requirements set out in Appendix 2 .	Audit interview and on-site inspection on 26/6/26.	There were no incidents reported during the audit period.	Not triggered
Non-Compliance Notification				
IA_42	A31. The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance	Audit interview and on-site inspection on 26/6/26. Post Approval Form_20260630033630.pdf Concept Proposal and Stage 1 for Alterations and Additions to Barker College - Post Approval Document Received - (SSD-31822612-P	IEA1 was undertaken on 13 August 2025 and the updated of the report v1.1 dated 13/7/26 identified 7 non-compliances. Evidence demonstrating that these non-compliances were notified to the Planning Secretary through the Major Projects Portal in accordance with Condition A31 has not been provided.	Not Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Letter from Urbis to DPHI – Barker College SSD-31822612, Request to Amend Varied Independent Environmental Audit Schedule, dated 23 June 2026	Separately, Urbis prepared a letter to DPHI dated 23 June 2026 notifying the Planning Secretary of a non-compliance relating to the timing of the Stage 1A Operational Independent Environmental Audit. The letter also requested an amendment to the varied Independent Environmental Audit schedule. A Post Approval Form was provided confirming lodgement of this notification through the Major Projects Portal.	
IA_43	A32. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance	Audit interview and on-site inspection on 26/6/26. Letter from Urbis to DPHI, Barker College SSD-31822612 Request to Amend Varied Independent Environmental Audit Schedule, 23/06/2026 Post Approval Form_20260630033630.pdf	IEA1 was undertaken on 13 August 2025 and the updated of the report v1.1 dated 13/7/26 identified 7 non-compliances. Evidence demonstrating that these non-compliances were notified to the Planning Secretary through the Major Projects Portal in accordance with Condition A31 has not been provided.	Not Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Concept Proposal and Stage 1 for Alterations and Additions to Barker College - Post Approval Document Received - (SSD-31822612-P	Separately, Urbis prepared a letter to DPHI dated 23 June 2026 notifying the Planning Secretary of a non-compliance relating to the timing of the Stage 1A Operational Independent Environmental Audit. The letter also requested an amendment to the varied Independent Environmental Audit schedule. A Post Approval Form was provided confirming lodgement of this notification through the Major Projects Portal.	
IA_44	A33. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Audit interview and on-site inspection on 26/6/26. Post Approval Form_20260630033630.pdf Concept Proposal and Stage 1 for Alterations and Additions to Barker College - Post Approval Document Received - (SSD-31822612-P	There were no incidences reported during the audit period.	Not triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Letter from Urbis to DPHI – Barker College SSD-31822612, Request to Amend Varied Independent Environmental Audit Schedule, dated 23 June 2026		
Revision of Strategies, Plans and Programs				
IA_45	A34. Within three months of the: (a) submission of an incident report under Schedule 3 condition A29; (b) submission of a Compliance Report under Schedule 3 condition A36; (c) approval of any modification of the conditions of this consent; or (d) issue of a direction of the Planning Secretary under condition A2(b) 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.	Audit interview and on-site inspection on 26/6/26.	There were no triggers requiring the revision of strategies, plans or program during the audit period.	Not triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_46	A35. 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.	Audit interview and on-site inspection on 26/6/26.	There were no triggers requiring the revision of strategies, plans or program during the audit period.	Not triggered
Compliance Reporting				
IA_47	A36. Within three months of the notified date of commencement of operation of Stage 1, a Compliance Report must be submitted and approval obtained from the Certifier confirming that the development has been carried out in accordance with the conditions of this consent.	Audit interview and on-site inspection on 26/6/26. Letter to Department notifying commencement of operation of Stage 1A, dated 7/5/26.	Operation of the Stage 1A works commenced on 16 January 2026. Accordingly, the requirement under Condition A36 to submit a Compliance Report within three months of commencement of operation was triggered. Evidence of the Compliance Report has not been provided for verification. Auditee to provide evidence.	Observation
PART C: PRIOR TO COMMENCEMENT OF CONSTRUCTION				
Notification of Commencement				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_48	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.	Audit interview and on-site inspection on 26/6/26. Barker College SSD-31822612: Commencement of Operation (Stage 1A), letter from Urbis to DPHI, 7/5/2026	Stage 1A commenced operation on 16 January 2026. The Planning Secretary was subsequently notified by Urbis in a letter dated 7 May 2026. The letter acknowledges that notification of commencement had not been provided at least 48 hours before commencement of operation as required by Condition C1.	Not Compliant
PART D: DURING CONSTRUCTION				
Independent Environmental Audit				
IA_49	D38. Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020)	Audit interview and on-site inspection on 26/6/26. DPHI approval letter of nominated auditor dated 5/6/26.	This audit was carried out in accordance with the Independent Audit Post Approval Requirements (2020)	Compliant
IA_50	D39. 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.	Audit interview and on-site inspection on 26/6/26. DPHI approval letter of nominated auditor dated 5/6/26.	The Applicant had sought and gained approval for their Independent Environmental Auditor in advance of the audit (letter dated DPHI approval letter of nominated auditor dated 5/6/26.).	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_51	D40. The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (2020), upon giving at least 4 weeks' notice (or timing) to the applicant of the date or timing upon which the audit must be commenced.	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered
IA_52	D41. 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 of submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	Audit interview and on-site inspection on 26/6/26. Independent Environmental Audit Report No. 1, Version 1, 7 th Sense Sustainability Consultants, 12/10/2025 Independent Environmental Audit Report No. 1, Version 1, 7 th Sense Sustainability Consultants, 12/10/2025 RFI July 2026 – Barker College-Auditee Response SSD-31822612-PA-19 Barker College - Response to RFI-135239994	The auditee had submitted a response to Department on the IEA Report version 1 on 14/10/25 The Applicant has provided an updated response to the findings of Independent Environmental Audit Report No. 1, Version 1.1 dated 13/7/26. The updated auditee response was actioned on 14 July 2026. Auditee to make sure they publish IEA V1.1 within 60 days	Observation

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_53	D42. 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.	Audit interview and on-site inspection on 26/6/26. RFI July 2026 – Barker College-Auditee Response SSD-31822612-PA-19 Barker College - Response to RFI-135239994	The Stage 1A construction IEA site inspection was undertaken on 13 August 2025. The corresponding IEA report was submitted to the Department on 5 May 2026, which was outside the two-month timeframe required by Condition D42. In the letter dated 30/7/2026 Urbis advised that the delay was due to a transition in project management responsibilities and administrative issues associated with the transfer of the Major Projects Portal account. Following issue of the updated Independent Environmental Audit Report No. 1, Version 1.1 dated 13 July 2026, the Applicant provided an updated response addressing the findings, which was actioned on 14 July 2026.	Observation
IA_54	D43. 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.	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
PART E PRIOR TO THE ISSUE OF OCCUPATION CERTIFICATE				
Notification of Occupation				
IA_55	E1. At least one month before the issue of the final occupation certificate, the date of commencement of the operation of the development must be notified to the Planning Secretary in writing.	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered
External Walls and Cladding				
IA_56	E2. Prior to the issue of any relevant occupation certificate, the Applicant must provide the Certifier with documented evidence that the products and systems used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels (as relevant to this consent), comply with the requirements of the BCA.	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered
IA_57	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.	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered
Post-Construction Dilapidation Report – Protection of Public Infrastructure				
IA_58	E4. Prior to the issue of any occupation certificate, the Applicant must engage a suitably qualified	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	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 Schedule 3 condition C4; (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.			
Repair of Public Infrastructure				
IA_59	E5. Unless the Applicant and the relevant public authority agree otherwise, the Applicant must:	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(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; and/or (c) pay compensation for the damage as agreed with the owner of the public infrastructure. Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions of this consent.			
Road Damage				
IA_60	E6. Prior to the issue of any relevant occupation certificate, the cost of repairing any damage caused to Council or other public authority's assets in the vicinity of the site as a result of construction works associated with the approved development must be met in full by the Applicant.	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered
Post-Construction Survey – Adjoining Properties				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_61	E7. Where a pre-construction survey has been undertaken in accordance with Schedule 3 condition C6, prior to the issue of the occupation certificate, 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 Schedule 3 condition C7; (b) be provided to the owner of the relevant buildings surveyed; (c) be provided to the Certifier; and (d) be provided to the Planning Secretary when requested.	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_62	E8. 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. Alternatively, the Applicant may pay compensation for the damage as agreed with the property owner.	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered
Utilities and Services				
IA_63	E9. Prior to the issue of any relevant occupation certificate, 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.	Audit interview and on-site inspection on 26/6/26.	This condition had not been triggered.	Not Triggered
Works as Executed Plans				
IA_64	E10. Prior to the issue of any relevant occupation certificate, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifier.	Audit interview and on-site inspection on 26/6/26. 251025 - Storm water as-builts Occupation Certificate No. 25/0985/01 (Part)	The stormwater as-built drawing shows the stormwater drainage layout for the Barker College Junior School Stairs.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Barker College - 91 Pacific Highway Hornsby & 9 Clarke Road, Waitara, 16/1/2026	The Occupation Certificate package also includes a Stormwater Compliance Certificate dated 10 September 2025, which states that GEBA Consulting Engineers inspected the stormwater management system on 9 September 2025 and certified that the works were constructed in accordance with the approved design. The package also includes an Installation Certificate for the stormwater drainage works.	
Green Travel Plan				
IA_65	E11. Prior to the issue of the occupation certificate for the PUDO area, a Green Travel Plan (GTP), must be submitted to and approved in writing by the Planning Secretary to promote the use of active and sustainable transport modes. The plan must: (a) be prepared by a suitably qualified traffic consultant in consultation with Council and TfNSW; (b) be consistent with the Green Travel Plan prepared by TTPP dated 10 October 2023;	Audit interview and on-site inspection on 26/6/26. Barker College Green Travel Plan, V03, The Transport Planning Partnership, 5/6/2026	The GTP dated 5 June 2026 was prepared by TTPP. The GTP states that the GTP was approved by DPHI on 25 March 2024. A DPHI post-approval traffic monitoring letter dated 24 June 2026 has also been provided, which confirms that the GTP was approved by the Department under PA-4.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(c) include objectives and modes share targets (i.e. site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP; (d) include specific tools and actions to help achieve the objectives and mode share targets submitted in the Green Travel Plan prepared by TTPP dated 10 October 2023; (e) include measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the GTP; and (f) include details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development.	Letter from DPHI, Concept Proposal and Stage 1 for Alterations & Additions to Barker College (SSD-31822612) Post Approval Traffic Monitoring Documentation, Conditions A25, A26 & A27 Rev Table_A25-A27 Post Approval Traffic Monitoring (TTPP response 260605) 20443-R07V03-260605-GTP (with Track Changes) Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026	The GTP addresses the requirements of Condition E11. Section 3 includes mode share objectives and targets, Section 4 identifies measures and actions to encourage sustainable transport, Section 6 addresses implementation responsibilities and resources and Section 5 covers the methodology to measure the effectiveness of the GTP objectives and targets.	
Operational Transport and Access Management Plan (OTAMP)				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_66	E12. The Applicant must prepare, an Operational Transport and Access Management Plan (OTAMP) for the PUDO area (following the physical mitigation works in this area) forming part of the Stage 1, an OTAMP must: (a) be prepared by a suitably qualified person, in consultation with Council and TfNSW; be submitted to and approval obtained from the Planning Secretary,;	Audit interview and on-site inspection on 26/6/26. Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026 20443-R08V03-260605-OTAMP (with Track Changes) Letter from DPHI, Concept Proposal and Stage 1 for Alterations & Additions to Barker College (SSD-31822612) Post Approval Traffic Monitoring Documentation, Conditions A25, A26 & A27	The OTAMP V03 dated 5 June 2026 was prepared by TTPP. The OTAMP states that the earlier OTAMP dated 13 February 2024 was approved on 27 March 2024 to satisfy Condition E12. The DPHI post-approval traffic monitoring letter dated 24 June 2026 also confirms approval of the updated OTAMP V03 dated 5 June 2026 as implementation evidence under Condition A26.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_67	E13. The OTAMP required by Schedule 3 condition E12 must: (a) be consistent with Appendix A and B of the Traffic and Access Impact Assessment - Operational Traffic and Access Management Plan prepared by TTPP dated 10 October 2023; (b) include: (i) 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; (ii) include details confirming the staggered start and finish times of the school as identified in the Barker College – Traffic Response to Submissions prepared by TTPP dated 10 October 2023; (iii) the location of all car parking spaces on the school campuses and their allocation (i.e. staff, visitor, accessible, emergency, etc.); (iv) the location and operational management procedures of the pick-up and drop-off parking located within the school, including staff management/traffic controller arrangements;	Audit interview and on-site inspection on 26/6/26. Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026 20443-R08V03-260605-OTAMP (with Track Changes) Letter from DPHI, Concept Proposal and Stage 1 for Alterations & Additions to Barker College (SSD-31822612) Post Approval Traffic Monitoring Documentation, Conditions A25, A26 & A27	The OTAMP V03 dated 5 June 2026 addresses the requirements of Condition E13. The plan includes pedestrian and access arrangements, staggered school start and finish times, car parking arrangements, PUDO management procedures, delivery/service vehicle and bus access arrangements, traffic management measures and a monitoring and review program. The OTAMP also states that the earlier OTAMP dated 13 February 2024, prepared to satisfy Conditions E12 and E13, was approved on 27 March 2024.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(v) delivery and services vehicle and bus access and management arrangements; (vi) management of approved access arrangements; (vii) 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; (viii) car parking arrangements and management associated with the proposed use of school facilities by community members; and (ix) a monitoring and review program.			
Car Parking, Service Vehicles, and Bicycle parking Arrangements				
IA_68	E14. Prior to the issue of the occupation certificate of the PUDO area, evidence must be submitted to and approval obtained from the Certifier that demonstrates that: (a) 438 car spaces are available for use by students and staff, within the site; (b) 49 car parking spaces are available within the Kurrajong Prep School for use as PUDO during the school AM and PM peak hours;	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(c) bicycle parking facilities comply with Schedule 3 condition B4; (d) appropriate pedestrian and cyclist advisory signs are to be provided; (e) all works/regulatory signposting associated with the proposed developments have been undertaken at no cost to the relevant roads' authority; (f) the bicycle parking spaces are located in easy to access, well-lit areas that incorporate passive surveillance; and (g) end-of-trip facilities for staff are provided			
Fire Safety Certification				
IA_69	E15. Prior to the issue of any relevant 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.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered
Structural Inspection Certificate				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_70	E16. Prior to the issue of any relevant 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 the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.	Audit interview and on-site inspection on 26/6/26. Structural Design Certificate – 250617 , Barker College, issued by Gemstrux Consulting Engineers, dated 17/06/2025. Structural Drawings – Barker College, prepared by Gemstrux Consulting Engineers, dated 04/06/2025 (approved by J.M.B.E Construction) Occupation Certificate No. 25/0985/01 (Part) Barker College - 91 Pacific Highway Hornsby & 9 Clarke Road, Waitara, 16/1/2026	The auditor notes that the Structural Design Certificate verifies compliance with the BCA. The Occupation Certificate package includes a Structural Compliance Certification dated 9 September 2025, which confirms that Gemstrux Consulting Engineers inspected the relevant structural elements and certified that they were constructed in compliance with the BCA and applicable Australian Standards. The package also includes the installation certificate – Structure (General).	Compliant
Outdoor Lighting				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_71	E17. Prior to the issue of any relevant occupation certificate, the Applicant must submit evidence from a suitably qualified practitioner to the Certifier that demonstrates that installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers and: (a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and (b) has been mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	Audit interview and on-site inspection on 26/6/26. Occupation Certificate No. 25/0985/01 (Part) Barker College - 91 Pacific Highway Hornsby & 9 Clarke Road, Waitara, 16/1/2026	The Occupation Certificate package includes a DA Checklist confirming that the outdoor lighting has been completed in accordance with the approved Development Consent.	Compliant
Signage				
IA_72	E18. Prior to the issue of any relevant occupation certificate, way-finding signage and signage identifying the location of staff car parking must be installed.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered
IA_73	E19. Prior to the issue of any relevant occupation certificate, bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered
Landscaping				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_74	E20. Prior to the issue of any relevant occupation certificate, the Applicant must submit evidence, to the satisfaction of the Certifier, demonstrating that the landscaping of the site has been completed in accordance with landscape plan(s) approved under Schedule 3 condition A2.	Audit interview and on-site inspection on 26/6/26. Occupation Certificate No. 25/0985/01 (Part) Barker College - 91 Pacific Highway Hornsby & 9 Clarke Road, Waitara, 16/1/2026	The Occupation Certificate package includes a Certificate Register confirming that the finished landscaping was completed in accordance with the approved Development Consent (SSD-31822612 Conditions E20 and E21) and the approved Construction Certificate drawings, and was certified by 360 Degrees Landscape Architects Pty Ltd on 19 September 2025. The package also includes a Landscaping Installation Certificate	Compliant
IA_75	E21. Prior to the issue of any relevant occupation certificate, the Applicant must prepare and submit to the Certifier for approval, and Operational Landscape Management Plan, to manage the revegetation and landscaping on-site, to the satisfaction of the Certifier. The plan must describe the ongoing monitoring and maintenance measure to manage revegetation and landscaping.	Audit interview and on-site inspection on 26/6/26. Occupation Certificate No. 25/0985/01 (Part) Barker College - 91 Pacific Highway Hornsby & 9 Clarke Road, Waitara, 16/1/2026	The Occupation Certificate package includes a Certificate Register confirming that the finished landscaping was completed in accordance with the approved Development Consent (SSD-31822612 Conditions E20 and E21) and the approved Construction Certificate drawings, and was certified by 360 Degrees Landscape Architects Pty Ltd on 19 September 2025. However, Operational Landscape Management Plan has not been provided	Observations

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Operational Management Plan				
IA_76	E22. The Applicant must prepare, an Operational Management Plan (OMP) for the school to: (a) include details of students and staff numbers (to be 2850 students and 480 full time equivalent staff); (b) include details confirming the staggered start and finish times of the school as identified in the Barker College – Traffic Response to Submissions prepared by TTPP dated 10 October 2023; (c) confirm the total number of students including the year groups; (d) include measures to ensure all way-finding signage, security measures (i.e. access control), and landscaping are managed to maintain their effectiveness; (e) detail the out of hours school use; (f) include an Emergency Management Plan that details all measures and procedures to ensure the safety of all on-site occupants in the event of any emergency, including evacuation measures; (g) include an overarching complaint handling system that would be applicable to all of the sub-plans and can be displayed publicly on the school’s website; and	Audit interview and on-site inspection on 26/6/26. Letter from DPHI, Concept Proposal & Stage 1 for Alterations & Additions to Barker College (SSD-31822612) Operational Management Plan, Conditions E22 and E23, 2/2/2024 Barker College Operational Management Plan, January 2024 Letter from Urbis, Barker College – SSD 31822612 – Condition E23 – Operational Management Plan, 19/1/2024 Post Approval Form_Condition E23	The Barker College Operational Management Plan dated January 2024 addresses the requirements of Condition E22.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(h) include an overarching review and monitoring program for a yearly review and monitoring of the operations of each of the relevant uses (applying to all of the sub-plans) at their commencement.			
IA_77	E23. The OMP must be submitted to and be approved by the Planning Secretary, prior to any increase in student population beyond that existing in the school campus at the time of this consent and ensure that the following information is published on the website: (a) details confirming the staggered start and finish times of the school as identified in the Barker College – Traffic Response to Submissions prepared by TTPP dated 10 October 2023; (b) details of the indicative out of hours school use; (c) details of an overarching complaint handling system; and (d) details of an overarching review and monitoring program which will be reviewed annually.	Audit interview and on-site inspection on 26/6/26. Letter from DPHI, Concept Proposal & Stage 1 for Alterations & Additions to Barker College (SSD-31822612) Operational Management Plan, Conditions E22 and E23, 2/2/2024 Barker College Operational Management Plan, January 2024 Letter from Urbis, Barker College – SSD 31822612 – Condition E23 – Operational Management Plan, 19/1/2024 Post Approval Form_Condition E23	The Barker College Operational Management Plan was submitted to DPHI and approved by the nominee of the Planning Secretary on 2 February 2024. DPHI confirmed that the OMP was submitted prior to any increase in student population. The OMP is also publicly available on the Barker College website.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Flood Emergency Management Plan				
IA_78	E24. Prior to the issue of the occupation certificate PUDO area, a detailed Flood Emergency Management Plan (FEMP) must be submitted to the Certifier that: (a) has been prepared by a suitably qualified and experienced person(s); (b) has been prepared noting the limitations described in the NSW Flood risk management manual 2023; (c) addresses the provisions of the Floodplain Risk Management Guidelines (EHG); (d) incorporates the following: (i) the flood emergency management protocols for school; (ii) predicted flood levels within the site and within the adjoining road system and other public land expected to be used by students and visitors; (iii) details strategies such as early or pre-emptive school closure, and other management requirements where relevant and where consistent with SES advice;	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered



Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(iv) detailed mitigation measures to ensure the school, including the PUDO areas/ vehicular access points from College Crescent, are closed before the beginning of the day in the first instance when a severe weather warning is issued for Hornsby or adjacent local government areas; (v) alternate traffic movement route within the site, during extreme flood events, where the driveway exit point at College Crescent becomes blocked by high hazard (H5) flood waters on this road; (vi) details of assembly points and flood free routes where required (such as routes via the pedestrian gate at Pacific Highway or Unwin Road; (vii) maps of the evacuation routes; (viii) clear emergency management triggers and responses; (ix) details of flood warning time and flood notification; and (x) clear roles and responsibilities for emergency flood management within the school; (xi) recognises that NSW SES is the lead combat agency for floods and state that any flood response directive issued by the SES must be followed;			

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	(xii) provides clear messaging and communication protocols including clear requirements that the FEMP be regularly reviewed; (e) includes details of awareness training for employees, contractors, visitors, students and caregivers and induction of new staff members; and (f) includes a monitoring and review program.			
IA_79	E25. A copy of the final Flood Emergency Management Plan (required by Schedule 3 condition E24) must be: (a) (b) (c) (d) peer-reviewed and endorsed by a suitably qualified engineer confirming that FEMP complies with requirements of Schedule 3 condition E24; approved by the Certifier; published on the Applicant's website at all times (the most recent version); and provided to the Planning Secretary for information, within 7 days of request.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered
Geotechnical				
IA_80	E26. Prior to the issue of the occupation certificate, satisfactory evidence must be submitted to the Certifier that any recommendations provided in the additional geotechnical investigation undertaken under Schedule 3 condition B5 have been incorporated into the design of the development (if relevant)	Audit interview and on-site inspection on 26/6/26.		Not Triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
Site Contamination				
IA_81	E27. Prior to the issue of any occupation certificate, the Applicant must submit a Section A1 Site Audit Statement or a Section A2 Site Audit Statement accompanied by an Environmental Management Plan (if required by the Site Auditor). The Section A1 or A2 Site Audit Statement must verify the site is suitable for the intended land use and be provided, along with any Environmental Management Plan (if required by the Site Auditor) to the Certifier and to the Planning Secretary upon request.	Audit interview and on-site inspection on 26/6/26. Occupation Certificate No. 25/0985/01 (Part) Barker College - 91 Pacific Highway Hornsby & 9 Clarke Road, Waitara, 16/1/2026	The Occupation Certificate package includes a checklist recording Condition E27 – Site Contamination as completed.	Compliant
Accessibility Requirements				
IA_82	E28. Prior to the issue of any relevant occupation certificate, a suitably qualified Access Consultant must certify that the existing buildings altered by the proposed works, as well as any new pedestrian connections within the site, car parking spaces and the landscaped areas identified in plans referenced in Schedule 3 condition A2 complies with the recommendations in the Access Assessment Report prepared by BCA Access dated 22 July 2022.	Audit interview and on-site inspection on 26/6/26. Occupation Certificate No. 25/0985/01 (Part) Barker College - 91 Pacific Highway Hornsby & 9 Clarke Road, Waitara, 16/1/2026	The Occupation Certificate package includes a checklist recording Condition E28 – Accessibility Requirements as completed.	Compliant
Mechanical Plant and equipment				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_83	E29. Prior to the issue of the occupation certificate, the Applicant must provide evidence from a suitability qualified consultant to and obtain approval from the Certifier demonstrating that all operational noise measures recommended in Schedule 3 condition B10 have been installed/implemented on site.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered
PART F POST OCCUPATION				
Community Communication Strategy				
IA_84	F1. The Community Communication Strategy, as approved by the Planning Secretary, must be implemented for a minimum of 12 months following the completion of construction.	Audit interview and on-site inspection on 26/6/26. Community Communication Strategy Barker College, 29/5/2025	The Community Communication Strategy dated 29 May 2025 has been provided. The Strategy applies across all Stage 1 construction works and for 12 months following completion of construction. As the overall Stage 1 construction works have not yet been completed, the 12-month post-construction implementation period required under Condition F1 has not yet commenced.	Not Triggered
Operational Management Plan				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_85	F2. The Applicant must implement the OMP approved under Schedule 3 condition E22 for the life of the development.	Audit interview and on-site inspection on 26/6/26. Letter from DPHI, Concept Proposal & Stage 1 for Alterations & Additions to Barker College (SSD-31822612) Operational Management Plan, Conditions E22 and E23, 2/2/2024 Barker College Operational Management Plan, January 2024 Letter from Urbis, Barker College – SSD 31822612 – Condition E23 – Operational Management Plan, 19/1/2024 Post Approval Form_Condition E23	The Barker College Operational Management Plan was approved by the nominee of the Planning Secretary on 2 February 2024. Based on the audit interview and site inspection undertaken on 26 June 2026, the OMP was being implemented for the operation of the school.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_86	F3. The OMP must be reviewed every year after commencement of operation and updated with additional mitigation and management measures to respond to complaints received. A copy of the reviewed and updated OMP must be submitted to the Planning Secretary and Council for the first three years of operation, for information.	Audit interview and on-site inspection on 26/6/26.	This condition has not yet been triggered	Not Triggered
Operational Transport and Access Management Plan (OTAMP)				
IA_87	F4. The OTAMP(s) approved under Schedule 3 condition Schedule 3 condition E12 (as revised from time to time) must be implemented by the Applicant for the life of the development.	Audit interview and on-site inspection on 26/6/26. Barker College Operational Traffic and Access Management Plan, V03, The Transport Planning Partnership, 5/6/2026 20443-R08V03-260605-OTAMP (with Track Changes)	The OTAMP V03 dated 5 June 2026 was prepared by TTPP and reflects changes and refinements implemented to the on-site operational traffic management arrangements. The DPHI letter dated 24 June 2026 approved the updated OTAMP V03 as implementation evidence under Condition A26 and notes that the OTAMP, as revised from time to time, must be implemented for the life of the development in accordance with Condition F4.	Compliant

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
		Letter from DPHI, Concept Proposal and Stage 1 for Alterations & Additions to Barker College (SSD-31822612) Post Approval Traffic Monitoring Documentation, Conditions A25, A26 & A27	Based on the documentation reviewed the OTAMP was being implemented at the time of the audit.	
Operational Noise Limits				
IA_88	F5. The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in the SSDA Acoustic Assessment – Concept Approval and Stage 1 Works prepared by Acoustic Logic Pty Ltd dated 25 October 2023.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered
IA_89	F6. Short term operational noise monitoring must be: (a) carried out within four months of student enrolment reaching 2850; (b) (c) carried out during school term during operational hours on a typical school day(s); and undertaken by an appropriately qualified person in accordance with the Noise Policy for Industry (EPA, 2017) or any latest version where valid data is collected.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_90	F7. The resultant monitoring report, prepared by the appropriately qualified person, must be submitted to the Planning Secretary within 5 months of commencement of use of the school and the associated open spaces, to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in the SSDA Acoustic Assessment – Concept Approval and Stage 1 Works prepared by Acoustic Logic Pty Ltd dated 25 October 2023.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered
IA_91	F8. Should the noise monitoring program required by Schedule 3 condition F6 identify any exceedance of the recommended noise levels referred to above, the Applicant must 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.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development	Not Triggered
Unobstructed Driveways and Parking Areas				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_92	F9. All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.	Audit interview and on-site inspection on 26/6/26.	Audit on-site inspection found that there was no obstruction to driveways, footways and car spaces.	Compliant
Green Travel Plan (GTP)				
IA_93	F10. The GTP required by Schedule 3 condition E11 of this consent must be updated annually and implemented unless otherwise agreed by the Planning Secretary.	Audit interview and on-site inspection on 26/6/26. Barker College Green Travel Plan, V03, The Transport Planning Partnership, 5/6/2026 Rev Table_A25-A27 Post Approval Traffic Monitoring (TTPP response 260605)	The GTP V03 dated 5 June 2026 has been provided as the first annual review/update of the GTP and includes the annual update required by Condition F10. TTPP advised that a second review of the GTP was being prepared for submission in July 2026. The Applicant has also advised that the 2026 GTP is still being finalised. Evidence demonstrating completion and implementation of the 2026 annual GTP update has not been provided.	Compliant
Outdoor Lighting				

Unique ID	Compliance Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
IA_94	F11. Notwithstanding Schedule 3 condition C10, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development.	Not Triggered
Signage				
IA_95	F12. All signage approved under this consent must be continuously maintained in a structurally sound and tidy manner by the Applicant for the duration of the development.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development.	Not Triggered
IA_96	F13. The illumination of signage must be switched off between 6pm and 7am, unless otherwise agreed by the Planning Secretary.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development.	Not Triggered
IA_97	F14. The lighting to be used in connection with approved signage including the LED screen must comply with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting.	Audit interview and on-site inspection on 26/6/26.	This requirement has not been triggered for the operation of Stage 1A of the development.	Not Triggered

APPENDIX B: Auditor Approval



Department of Planning, Housing and Infrastructure

Reference: SSD-31822612-PA-18

Georgina Augustesen
Projects Manager, Barker College
C/- Urbis Ltd
ACN 105 256 228
Level 8, 123 Pitt Street
Sydney NSW 200
05/06/2026

Sent via the Major Projects Portal only

Subject: Concept Proposal and Stage 1 for Alterations and Additions to Barker College - D39
Appointment of Experts

Dear Ms Augustesen

I refer to your request for the Planning Secretary's agreement for a suitably qualified, experienced, and independent person to conduct an operational Independent Audit (IA) of the Stage 1 Alterations and Additions to Barker College (**project**), submitted as required by Schedule 3, Condition D39 of SSD-31822612 (**consent**) to the NSW Department of Planning, Housing and Infrastructure (**Department**) on 25 May 2026.

The Department has reviewed the independent auditor nomination and, based on the information you have provided, is satisfied that the proposed person is suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I approve the appointment of Ibrahim Awad of Seventh Sense Sustainability Consultants Pty Ltd to prepare and undertake the project's first operational IA.

Please note:

- This correspondence must be appended to the IA Report.
- The IA must be prepared, undertaken, and finalised in accordance with the conditions of consent and the Department's *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- The above auditor is approved for the current operational audit only. Additional approval must be sought from the Planning Secretary for future audits of the development.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The approved Lead Auditor must attend the site inspection component of the audit.

Department of Planning, Housing and Infrastructure



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

Should you wish to discuss the matter further, please contact Divyansh Kumar, Compliance Officer on (02) 9274 6308 or email compliance@planning.nsw.gov.au

Yours sincerely



Rob Sherry
A/Director Compliance Metro
Compliance

As nominee of the Planning Secretary

APPENDIX C: Consultations

DPHI

DPHI Consultation - Independent Environmental Audit - Operational Phase - Barker College (SSD-31822612-PA-18)

 Ibrahim Awad
To: compliance@planning.nsw.gov.au
Cc:  Nayila Nazar

  Reply  Reply all  Forward  ...

Thu 7/30/2026 10:08 AM

 Appointment of Experts_050...
529 KB

Dear Compliance Team

I have been appointed as the Independent Environmental Auditor for the above project – please see auditor approval attached.

As per the Auditor Guidelines, I'm reaching out to ask if there are any issues and/ or concerns that you would like me to consider as part of the audit scope.

Please note that the development that is the subject of this audit (i.e. Stage 1A) is the construction of a minor stair-case within the school grounds, which has now been completed. Future stages of the development contain the more substantial development works to be completed.

Please let me know if you would prefer to discuss by phone or online.

Thanks & regards,

Ibrahim

DPHI Consultation - Independent Environmental Audit - Operational Phase - Barker College (SSD-31822612-PA-18) Summarize this email



Divyansh Kumar <divyansh.kumar@dphi.nsw.gov.au> on behalf of DPE PSVC Compliance Mailbox <compli...  ...

To:  Ibrahim Awad

Fri 8/7/2026 1:11 PM

Cc:  Nayila Nazar; Divyansh Kumar <divyansh.kumar@dphi.nsw.gov.au>

Dear Ibrahim,

Thank you for your email regarding the Stage 1A Operational Independent Environmental Audit (IEA) for Barker College (SSD-31822612).

The Department requests that the audit:

- specifically review the actions and recommendations associated with the previous findings relating to Conditions D8 (Implementation of Management Plans) and D21 (Erosion and Sediment Control), and assess whether those matters have been adequately addressed;
- clearly document how any issues raised through stakeholder consultation have been considered and addressed in the audit assessment; and
- assess all applicable consent conditions and assign an appropriate compliance status in accordance with the IAPAR 2020 (e.g. compliant, non-compliant or not triggered), consistent with the Department's determination letter dated 6 August 2026.

The Department also notes that the consultation request refers to an Operational Phase audit; however, it states that the subject of the audit is the construction of a minor staircase within the school grounds. Please clarify how the audit scope has been determined and whether the audit will assess compliance with all consent conditions relevant to the operational phase of Stage 1A.

Other than the matters outlined above, the Department does not currently have any additional issues or concerns to raise.

Regards,
Div

APPENDIX D: Photos on-site inspection



Photo 1: Completed pathway lighting



Photo 2: Completed pathway



Photo 3: Pathway and lighting



Photo 4: Completed staircase brickwork and landscaping



Photo 5: Completed signage



Photo 6: Stormwater collection drains at top of staircase



Photo 7: Completed staircase construction works



Photo 8: Photo on top of staircase



Photo 9: Installed gutter drain at top of staircase



Photo 10: Staircase built in lighting



Photo 11: Staircase railings

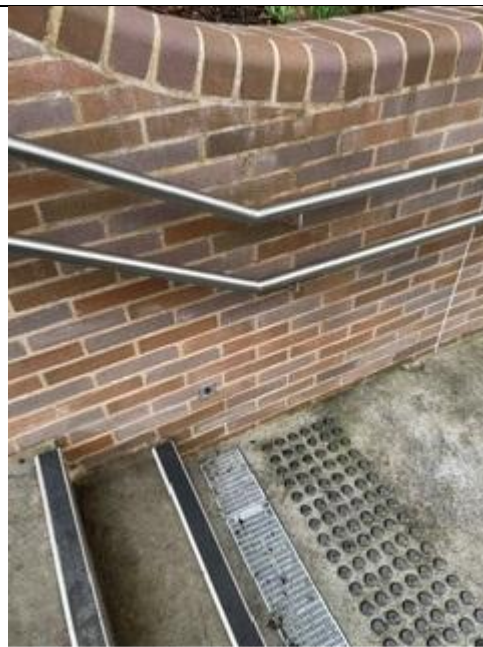


Photo 12: Drain at base of staircase



Photo 13: Drain at base of staircase



Photo 14: Reticulation of drainage from staircase to main stormwater drain



Photo 15: Photo at base of staircase

APPENDIX E: Auditor Declaration

Declaration of Independence - Auditor

Final Independent Audit Report Declaration Form – Lead Auditor	
Project Name:	Barker College
Application Number:	SSD-31822612
Project Address:	91 Pacific Highway, Hornsby and 9 Clarke Road, Waitara (Lot 100 DP 1262386 and Lot 100 DP 1232343)
Proponent:	Barker College
Title of Audit:	Independent Environmental Audit Report No. 2 – Barker College – Operational Phase
Date:	2/9/26
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) <i>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</i> b) <i>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)</i>	

Final Independent Audit Report Declaration Form – Lead Auditor	
Name of Auditor:	Ibrahim Awad
Signature:	 22/8/26
Qualification:	Bachelor of Science (Env) - Macquarie University Master of Engineering Science (Civil & Env) – University of Melbourne. Master of Environmental Law – University of Sydney Certified Lead Environmental Auditor, Exemplar Global, Certificate No. 110720
Company:	Seventh Sense Sustainability Consultants Pty Ltd
Company Address:	International Tower One, Level 35/100 Barangaroo Ave, Barangaroo NSW 2000

APPENDIX F: Department Letter on Timing of Audits

Department of Planning, Housing and Infrastructure



NSW Planning ref: SSD-31822612-PA-13

Georgina Augustesen
Barker College
C/- Urbis Ltd
ACN 105 256 228
Level 8, 123 Pitt Street
Sydney NSW 2000
11 July 2025

Attention: Holly McNamara

Sent via the Major Projects Portal only

Subject: Concept Proposal and Stage 1 for Alterations and Additions to Barker College –
Request to vary Independent Audit timing requirements

Dear Ms McNamara

I refer to your request (SSD-31822612-PA-13) for the Planning Secretary's consideration of varied Independent Environmental Audit (IEA) timing requirements, instead of those required under Schedule 3, Condition D38 of SSD-31822616 (consent) and the *Independent Audit Post Approval Requirements (2020)* (IAPAR) submitted to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 4 July 2025.

NSW Planning has considered the proposed varied timing requirements and does not object in the circumstances.

Pursuant to Schedule 3, Condition D40 of the consent, as nominee of the Planning Secretary I require you to carry out the project IEAs for Stage 1 in accordance with Table 2 of the letter from Urbis Ltd dated 4 July 2025 and provided at **Attachment 1**.

All IEAs must otherwise be conducted as per Schedule 3, Conditions D38 to D43 of the consent and the IAPARs, but for the timing requirements.

Please ensure that a copy of this letter is included in the appendices of each final IEA report as evidence of the timing variation.

Should you wish to discuss the matter further, please contact Samuel Condon, Senior Compliance Officer on (02) 8275 1169 or email compliance@planning.nsw.gov.au

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124

www.dphi.nsw.gov.au

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Department of Planning, Housing and Infrastructure



Yours sincerely



Gabriel Abi-Saab

A/Team Leader – Metro Other

Compliance

As nominee of the Planning Secretary

Attachment 1: Table 2, varied IEA submission timing requirements

Table 2 Proposed Audit Frequency based on Approved Staging

Phase	Initial Independent Audit	Ongoing Independent Audit
Stage 1A – 10 week construction period w/c 16 June to w/c 18 August 2025 Operation commences from w/c 18 August 2025		
Construction	Initial audit to be undertaken prior to w/c 18 August 2025 (in accordance with Post-Approval Requirements)	N/A – Maximum construction period of 10 weeks
Operation	Initial audit to be undertaken prior to 16 February 2026 (in accordance with Post-Approval Requirements)	Ongoing audit not required due to minor scope of works
Closure/Rehabilitation	N/A	N/A
Stage 1B – 26 week construction period Q1 to Q2 2026 Operation commences Q3 2026		
Construction	Initial audit to be undertaken prior to 26 March 2026 (in accordance with Post-Approval Requirements)	N/A – Maximum construction period of 26 weeks
Operation	Initial audit to be undertaken prior to 30 December 2026 (in accordance with Post-Approval Requirements)	Ongoing audit not required due to minor scope of works
Closure/Rehabilitation	N/A	N/A
Stage 1C – 12 month construction period Q1 to Q4 2030 Operation commences Q1 2031		
Construction	Initial audit to be undertaken prior to 26 March 2030 (in accordance with Post-Approval Requirements)	Ongoing audit to be undertaken prior to 24 September 2030 (in accordance with Post-Approval Requirements) No further ongoing audit required due to maximum construction period of 12 months
Operation	Initial audit to be undertaken prior to 30 June 2031 (in accordance with Post-Approval Requirements)	Ongoing audit to be undertaken prior to 30 June 2034 No further ongoing audit required due to limited scope of development.
Closure/Rehabilitation	N/A	N/A



Seventh Sense
Sustainability Consultants