

SSD 9095

Jim Betts  
Planning Secretary  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

Attn: Rob Sherry

Friday, January 10, 2020

Dear Mr Sherry

**Redevelopment of Armidale Secondary College and SSD 9095: Re-submission of Independent Audit Report in accordance with Condition C41.**

I refer to Armidale High School Redevelopment – SSD9095 approved on the 29 May 2019.

In accordance, with condition C41 and the commentary provided by Department the following documents are being re-submitted to the Planning Secretary for information:

- Independent Audit Report, Steve Fermio from Wolf Peak, 17 September 2019, V2

The documents have been reviewed internally by myself.

In accordance with condition C42, School Infrastructure NSW has responded to the findings in section 4 of the Independent Audit Report as **Attachment A**.

Yours sincerely



Robert Crestani  
**Senior Project Director**  
**Schools Infrastructure NSW**



## Attachment A



**NSW Department of Education**

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**NSW Department of Education**  
**Armidale Secondary College**  
**(SSD 9095)**

SINSW Response to Independent  
Environmental Audit (IEA)

7 January 2020 (Revision 01)

## Response to Independent Environmental Audit Non-Compliances

Six non-compliances have been identified in the IEA report dated 17 September 2019; Version 2. The non-compliances and are being addressed as follows;

ID	Consent Heading	Compliance Requirement	Comments / Observations / Supporting Documentations	Compliance Status	Independent Audit Findings and Recommendations Actions (A) = address non-compliances Recommendations (R) = address observations	SINSW Response and Actions
A23	Access to Information	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: <ul style="list-style-type: none"> <li>(a) make the following information and documents (as they are obtained or approved) publicly available on its website: <ul style="list-style-type: none"> <li>i. the documents referred to in condition A2 of this consent;</li> <li>ii. all current statutory approvals for the development;</li> <li>iii. all approved strategies, plans and programs required under the conditions of this consent;</li> <li>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;</li> <li>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;</li> <li>vi. a summary of the current stage and progress of the development;</li> <li>vii. contact details to enquire about the development or to make a complaint;</li> <li>viii. a complaints register, updated monthly;</li> <li>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;</li> <li>x. any other matter required by the Planning Secretary; and</li> </ul> </li> <li>(b) keep such information up to date, to the satisfaction of the Planning Secretary.</li> </ul>	This is confirmed on 07.01.20 via a visit of <a href="https://www.schoolinfrastructure.nsw.gov.au/projects/a/armidale-secondary-college.html">https://www.schoolinfrastructure.nsw.gov.au/projects/a/armidale-secondary-college.html</a> where a link to Major Projects site which contains approved plans, development consent can be viewed or downloaded.  CEMP (and subplans), PCCR, IEA, CCS, Asbestos Management Plan has been uploaded onto SINSW website.	Non-Compliant	At the time of the site inspection on 9 July 2019, the website did not make available the specified documents and information required by CoC A23(a)(iii) and (viii).	Non-compliance noted. All information required under A23(a)(iii) and (viii) has been uploaded on the website. This is confirmed on 07.01.20 via a visit of <a href="https://www.schoolinfrastructure.nsw.gov.au/projects/a/armidale-secondary-college.html">https://www.schoolinfrastructure.nsw.gov.au/projects/a/armidale-secondary-college.html</a> . No further action required.
B7	Unexpected Contamination Procedure	Prior to the commencement of construction, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition B20 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.	Details of contaminated material and disposal site advised to DPIE by SINSW in letter dated 16 July 2019.	Non-Compliant	At the inspection on 9 July 2019, the auditor was made aware that several loads of contaminated material had been disposed of to landfill, information about which was not submitted to the Planning Secretary in accordance with the requirements of CoC B7. Details subsequently provided as follows: Contaminated Topsoil Disposed to Swanbank Landfill on 18/5/19, 20/5/19, 21/5/19 and 22/5/19 Contaminated Material Removal Request 2 - Soil West of Building B Disposed to Swanbank Landfill on 13/6/19, 14/6/19 and 20/6/19 Contaminated Material Removal Request 3 - Ag Zone Disposed to	Non-compliance noted. Details of contaminated waste advised to DPIE. No further action required.

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					Swanbank Landfill on 24/5/19, 25/6/19, 28/6/19 and 29/6/19	
C5	<b>Construction Hours</b>	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:  a. between 7am and 6pm, Mondays to Fridays inclusive; and b. between 8am and 1pm, Saturdays.  No work may be carried out on Sundays or public holidays.	Matter was raised with principal contractor who communicated this issue to the relevant sub-contractor. No further complaints have been received to date.	Non-Compliant	A complaint recorded in the complaints register dated 13 June indicates that a delivery of material to site occurred prior to 7am on this date	Non-compliance noted. All contractors reminded of the importance of complying with conditions of consent (including hours of work). No further action required.
C16	<b>Construction Noise Limits</b>	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C5.	As detailed in the Complaints Register last updated 4 November 2019, trucks were demobilised from the site as soon as possible after receipt of complaint and returned to their depot. A non-conformance was issued to the subcontractor (Aconex) via Project Management Communication System.	Non-Compliant	As per CoC 5 above the complaint received on 13 June indicates that this requirement was not met	Non-compliance noted. Communication to relevant subcontractor advising them of no deliveries outside hours. No further action required.
C25	<b>Dust Minimisation</b>	During construction, the Applicant must ensure that:  (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	<ul style="list-style-type: none"> <li>Truck shaker grid was installed 31 July 2019. Aerial photograph dated 17.08.19 confirms installation of shaker grid.</li> <li>Principal contractor is aware of complaint has been taking necessary measures to ensure no soil or dirt leaves site.</li> <li>Photographic evidence available showing street sweeper trucks cleaning Butler Street.</li> </ul>	Non-Compliant	While items (a) (b) & (e) were being implemented, mud tracking onto Butler Street was observed on the day of the site audit.	Non-compliance noted, measures implemented to avoid future non-compliances. No further action required.

ID	Consent Heading	Compliance Requirement	Comments / Observations / Supporting Documentations	Compliance Status	Independent Audit Findings and Recommendations Actions (A) = address non-compliances Recommendations (R) = address observations	SINSW Response and Actions
C32	<b>Waste Storage and Processing</b>	Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	<ul style="list-style-type: none"> <li>Additional bins provided on site.</li> <li>Toolbox Talk 24.07.19 covered topic of litter on site.</li> <li>No complaints received regarding litter on site or around site.</li> <li>Principal contractor advised litter to be monitored on regular basis.</li> </ul>	Non-Compliant	Construction wastes generally well sorted into separate receptacles, however litter was noted in places throughout site (Plates 4 & 5)	Non-compliance noted. The project team has taken on feedback of IEA in regards to litter and various measures and advisory communication has been implemented to address this issue. No further action required.

## Response to Independent Environmental Audit Corrective Action Requests/Observations

Two corrective action requests/observations were included in the IEA report dated 17 September 2019; Version 2. SINSW has reviewed the recommendations and provides the following commentary:

ID	Consent Heading	Compliance Requirement	Comments / Observations / Supporting Documentations	Compliance Status	Independent Audit Findings and Recommendations Actions (A) = address non-compliances Recommendations (R) = address observations	Actions Taken / to be Taken following SINSW Response to IEA
C27	<b>Erosion and Sediment Control</b>	All erosion and sediment control measures, must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment.	During the Auditor's site inspection maintenance issues were noted around the base of large soil stockpile where soil boulders had rolled over silt fence (Plate 3) (this was being addressed at the time of the inspection however).	Compliant	(R) A documented record of erosion and sediment controls (e.g. plan or map) and in particular any changes to these over time is recommended as an observation from this audit. The changes to the original approved erosion and sediment control plan can be marked up by hand if needed.	<p>Recommendation noted and communicated to the principal contractor.</p> <p>Small changes to Erosion and Sediment Control Plan may be marked up for contractor's reference. However, any significant changes to the Sediment and Erosion Control Plan will be required to be submitted to the Secretary and CA within 6 weeks of the review as per Condition C50.</p> <p>Notwithstanding, the principal contractor will undertake proactive inspections of current sediment and erosion control measures to ensure the measures are operating at or above required performance. Further, any additional or interim measures can be implemented where necessary to ensure minimal environmental impacts and optimal environmental performance of the development.</p> <p>Photographic evidence from the principal contractor available showing satisfactory maintenance of sediment and erosion controls.</p>
6.2	<b>Section 6.2 of Construction Soil and Water Management Plan (CSWMP)</b>	Section 6.2 of the CSWMP requires, as one of the specific mitigation measures, that any fuel, oil or other liquids stored onsite would be stored in an appropriately sized impervious bundled area.	During the Auditor's site inspection while the storage of waste oil, fuels and chemicals was observed within appropriately bundled containers there was some minor storage of such materials noted outside designated bundled storage areas (Plates 6 & 7).	Compliant	N/A - No recommendations made, just observations detailed	<p>Principal contractor was made aware of this observation and advised the keep such materials within designated storage areas.</p> <p>It should also be noted that at any time during work hours, there is a possibility that such materials may be currently in use, principal contractor has advised that when these materials are not in use they are stored in the required impervious areas.</p>