

Catherine Field New Primary School (SSD 9477): Submission of Independent Audit Report and response in accordance with Condition C36 and C37

I refer to Catherine Field New Primary School approved on the 18th June 2020.

In accordance, with condition C36 of the Development Consent, the following document has been submitted to the Planning Secretary for information:

- SSD 9477 - New Catherine Field Primary School IEA Report Rev1

As per the requirements of condition C37 the Department must be issued with a response from the proponent to the Independent Audit Report, therefore the following attachments are provided for your information:

- Attachment A - Response to Independent Audit non-compliances
- Attachment B - Response to Independent Audit recommendations

Additionally, in accordance, with condition C36 of the Development Consent, please be advised that the Department intend to make the Construction Compliance Report publicly available on it's website, no sooner than 60 days following the submission of this letter.

Attachment A – Response to Independent Audit non-compliances

CoC	Consent heading	Compliance Requirement	Auditor's Comments / Observations	Compliance Status	SINSW Response and Actions
A29/A30	Non-compliance notification	CoC A29/A30 states that the Planning Secretary must be notified in writing within seven days after the proponent becomes aware of any non-compliance.	Construction commenced 30/06/20. On 4/09/20 the Department wrote to SINSW stating that SINSW's request for approval of the Sustainable School Certification Scheme was submitted to the Department on 07/08/20 (which is after the commencement of construction) and is currently under review. On 04/09/20 the Department advised that it granted an extension to the time required to register for Green Star Rating until 25/09/20 (or obtain approval of alternative certification). The non-compliance was not notified / reported as required by CoC A29 and A30.	Non-compliant	Non-compliance noted. Non-compliance notification for B9 was issued to DPIE on 24/09/20. Timing non-compliance, no further action required.
B9	Ecologically sustainable development	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either: (b) seeking approval from the Planning Secretary for an alternative certification process.	Construction commenced 30/06/20. On 08/09/20 the Department wrote to SINSW stating that SINSW's request for approval of the Sustainable School Certification Scheme was submitted to the Department on 07/08/20 (which is after the commencement of construction) and is currently under review. On 08/09/20 the Department advised that it granted an extension to the time required to register for Green Star Rating until 25/09/20 (or obtain approval of alternative certification).	Non-compliant	Non-compliance noted. DPIE approved extension request for approval of Alternative ESD certification process. Letter sent 01/09/20. No further action required. Letter also sent 22/06/20



Attachment B – Response to Independent Audit Observations

Consent condition #	Audit Improvement Recommendations	Department of Education Actions	Evidence of actions
A9	<p>CoC A9 states that the development must be undertaken in accordance with the findings and recommendations of the Stage 2 Environmental Site Assessment prepared by Environmental Investigation Services dated 21 December 2018.</p> <p>A Salinity Management Plan has not been prepared as recommended by the Stage 2 ESA. A justification has been provided in the CSWMSP, on the basis that the Project is largely a consumer of imported material (i.e.: significant excavation / material export is not required).</p> <p>The Auditor agrees that a Salinity Management Plan for the Project is not required on the following basis:</p> <ul style="list-style-type: none"> - The Stage 2 ESA identified shallow soils as low salinity risk and was prepared prior to detailed design which resulted in minimal excavation - Earthworks were approved under a development consent with Council and is outside the scope of the SSD Project - Imported fill is assessed by an EPA accredited Contaminated Sites Auditor and no issues have been raised. 	As agreed by the Independent Auditor, corrective action is not required as Salinity Management is not applicable to this project.	N/A
B13	CoC B13 requires that the CEMP must include (g) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure. The unexpected finds protocol in Section 4.11 does not properly address the steps required in response to heritage items, rather it is general and more relevant to contamination. The Auditor notes that the EIS identified the heritage potential of the site to be low.	Update the CEMP to include a specific unexpected finds protocol and associated communications procedure for heritage.	As per consent condition A32, the CEMP is currently undertaking a review and the updated section is now captured in the forthcoming CEMP update that is to be issued to DPIE upon completion (ETA October 2020).
B17	<p>CoC B17 states that SINSW must prepare a Construction Soil and Water Management Sub-Plan (CSWMSP) and the plan must:</p> <p>(c) include a Salinity Management Plan prepared in accordance with the recommendations of the Stage 2 Environmental Site Assessment prepared by Environmental Investigation Services dated 21 December 2018.</p> <p>A Salinity Management Plan has not been prepared as recommended by the Stage 2 ESA. A justification has been provided in the CSWMSP, on the basis that the Project is largely a consumer of imported material (i.e.: significant excavation / material export is not required).</p> <p>The Auditor agrees that a Salinity Management Plan for the Project is not required on the following basis:</p> <ul style="list-style-type: none"> - The Stage 2 ESA identified shallow soils as low salinity risk and was prepared prior to detailed design which resulted in minimal excavation - Earthworks were approved under a development consent with Council and is outside the scope of the SSD Project - Imported fill is assessed by an EPA accredited Contaminated Sites Auditor and no issues have been raised. 	As agreed by the Independent Auditor, corrective action is not required as Salinity Management is not applicable to this project.	N/A
C14	<p>CoC C14 states that the proponent must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' (non-tonal reversing alarms) to ensure noise impacts on surrounding noise sensitive receivers are minimised.</p> <p>It was observed on site that there were multiple pieces of mobile plant in operation. Two were observed to have</p>	<p>Consider implementing a process to:</p> <ul style="list-style-type: none"> - recommend subcontractors provide plant with non-tonal reversing alarms, or - verify that non-tonal reversing alarms compromises safety on site. 	<p>Contractor has been requested to investigate the possibility of implementing non-tonal alarms where safety will not be compromised.</p> <p>Discussions regarding actions occurred 28/09/20</p>

Consent condition #	Audit Improvement Recommendations	Department of Education Actions	Evidence of actions
	tonal reversing alarms (i.e.: not quackers) fitted. That being said, there have been no complaints received to date and, therefore, noise impacts on the surrounding receivers may be considered minimal.		
C15	<p>CoC C15 states that vibration caused by construction at any residence or structure outside the site must be limited to:</p> <p>(a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and</p> <p>(b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time).</p> <p>The CNVMSP does not include detailed consideration of the use of vibratory rollers despite this plant being used on site. To note, current works are not within the safe work distances of any buildings.</p>	Update CNVMSP to include details on the use and management of vibratory rollers.	As per consent condition A32, the CEMP is currently undertaking a review and the updated section is now captured in the forthcoming CEMP update that is to be issued to DPIE upon completion (ETA October 2020).
C16	<p>CoC C16 states that vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C15.</p> <p>The CNVMSP does not include detailed consideration of the use of vibratory rollers despite this plant being used on site. To note, current works are not within the safe work distances of any buildings.</p>	Provide details of the vibratory rollers in the CNVMSP	As per consent condition A32, the CEMP is currently undertaking a review and the updated section is now captured in the forthcoming CEMP update that is to be issued to DPIE upon completion (30 October 2020).
C20	<p>CoC 20 states that during construction, SINSW must ensure that (among other things):</p> <p>(c) trucks associated with the development do not track dirt onto the public road network; and</p> <p>(d) public roads used by these trucks are kept clean.</p> <p>It was observed that an alternative access, shared with adjacent land release, was being used temporarily. This temporary access is not shown on the Project erosion and sediment control plan.</p> <p>The Auditor notes that whilst the access is not shown on the Project plans, it was observed as being properly installed and maintained consistent with the Blue Book requirements. There was limited material tracking on the local road, however this could not necessarily be attributable to the Project as a large number of vehicle movements were associated with the adjacent land release project.</p>	Update CSWMSP to identify the temporary access.	As per consent condition A32, the CEMP is currently undertaking a review and the updated section is now captured in the forthcoming CEMP update that is to be issued to DPIE upon completion (30 October 2020).
C21	<p>CoC C21 states that 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. Erosion and sediment control techniques, as a minimum, are to be in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom, 2004) commonly referred to as the 'Blue Book'.</p> <p>It was observed that an alternative access, shared with adjacent land release, was being used temporarily. This temporary access is not shown on the Project erosion and sediment control plan.</p> <p>The Auditor notes that whilst the access is not shown on the Project plans, it was observed as being properly installed and maintained consistent with the Blue Book requirements. There was limited material tracking on the local road, however this could not necessarily be attributable to the Project as a large number of vehicle movements were associated with the adjacent land release project.</p>	Update CSWMSP to identify the temporary access	As per consent condition A32, the CEMP is currently undertaking a review and the updated section is now captured in the forthcoming CEMP update that is to be issued to DPIE upon completion (30 October 2020).

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CWSMP Section 5.1.5	The CWSMP states that concrete trucks and pumps shall be washed out at designated locations as shown on the site layout plan. The CWSMP refers to the site layout plan showing the locations of the concrete washout bays, however the site layout plan does not show this detail.	Update the site layout plan to include this detail.	Contractor to update site plan by 31/11/20
CSWMSP	The CSWMSP includes the erosion and sediment control plan, which identifies site access and egress points. It was observed that an alternative access, shared with adjacent land release, was being used temporarily. This temporary access is not shown on the Project erosion and sediment control plan. The Auditor notes that whilst the access is not shown on the Project plans, it was observed as being properly installed and maintained consistent with the Blue Book requirements. There was limited material tracking on the local road, however this could not necessarily be attributable to the Project as a large number of vehicle movements were associated with the adjacent land release project.	Update CSWMSP to identify the temporary access.	As per consent condition A32, the CEMP is currently undertaking a review and the updated section is now captured in the forthcoming CEMP update that is to be issued to DPIE upon completion (ETA October 2020).
CTPMP p68	The CTPMSP shows the Construction Vehicle Access Routes: stabilised exit points present on O'Keefe Drive. The two access points from the CTPMSP were sighted but not in operation. It was observed that an alternative access, shared with adjacent land release, was being used temporarily. This temporary access is not shown on the CTPMSP. The Auditor notes that whilst the access is not shown on the Project plans, it was observed as being well installed and maintained. Given the context of the site (and the access being suitable for use by the adjacent land release project), there does not appear to be any traffic impact associated with the temporary change.	Update CTPMSP to identify the temporary access.	As per consent condition A32, the CEMP is currently undertaking a review and the updated section is now captured in the forthcoming CEMP update that is to be issued to DPIE upon completion (30 October 2020).

