

Jim Betts
Planning Secretary
Department of Planning, Industry and Environment
12 Darcy Street
Parramatta NSW 2150

Attn: Rob Sherry

7 July 2021

Dear Mr Betts

Darlington Public School (SSD 9914): Submission of Independent Audit Report and response in accordance with Condition C45 and C46

I refer to Darlington School Redevelopment approved on the 30 November 2020.

In accordance, with condition C46 of the Development Consent, the following document has been submitted to the Planning Secretary for information:

- Independent Environmental Audit, Darlington Public School Redevelopment, SNC-Lavalin Atkins, 12 July 2021, Rev.1

As per the requirements of condition C45 and C46 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

Yours sincerely



Karissa Kendall
Project Director
Schools Infrastructure NSW



Attachment A – Response to Independent Audit non-compliances

Condition ID	Compliance Requirement	Audit findings	Audit Recommendations	Department of Education Actions	Evidence of Actions
B23	Prior to the commencement of vegetation clearing, the class and number of ecosystem credits (in the table below) must be retired to offset the residual biodiversity impacts of the development.	<p>NCR01</p> <p>Clearing commenced prior to Biodiversity/ ecosystem credits being finalised, resulting in the early unapproved clearing of 6 trees.</p> <p>Noncompliance self-reported by AW Edwards. Identified 18/1 and notified to DPIE 19/1.</p> <p>The subject trees which were removed were approved for removal under the SSD, but were removed early.</p>	Nil	<p>Non-compliance notice issued to PS 19/01/21.</p> <p>Submission of evidence of retirement of Biodiversity Credits issued to PS 12/02/21.</p> <p>All potential impacts on trees to remain were appropriately managed, as all tree protection measures were already implemented for the early works.</p> <p>Clearing was undertaken by arborist and following pre-clearing checks.</p> <p>Training and information provided to project personnel, on consent conditions and obligations.</p>	<p>Non-compliance notice issued to PS 19/01/21. SSD-9914-PA-2</p> <p>Submission of evidence of retirement of Biodiversity Credits issued to PS 12/02/21. SSD-9914-PA-10.</p> <p>Further measures implemented for future tree removal:</p> <ul style="list-style-type: none"> - 'For Construction' Landscape drawings aligned with SSD approved tree removal - Contractor Meeting minutes regarding tree removal methodology and protection. - Toolbox talk



Attachment B – Response to Independent Audit recommendations

Condition ID	Compliance Requirement	Audit findings	Audit Recommendations	Department of Education Actions	Evidence of actions
B28	(a) all vehicles must enter and leave the site in a forward direction;	<p>During the audit, 1 truck observed onsite (delivery of blue metal), left in a forward direction. Uncertain if reversed into site, however limited turning circle in place.</p> <p>Reference should be made to Section 5.1 of the CTPMSP and the swept path analysis presented in Appendix E, which notes "All vehicle manoeuvres to and from the site are to be in a forward direction during all stages of construction.</p> <p>A swept path analysis has been undertaken for an 8.8m MRV demonstrating satisfactory entry and egress movements to and from each site access."</p>	<p>Review applicability of B28(a) as the work progresses and site becomes more constrained. Will again need revisiting, as Stage 2 commences and progresses</p>	<p>No vehicles are to reverse into or out of the site.</p> <p>As at 06/07/2021 there is no longer access to Stage 1 site for vehicles to enter as all access is closed off</p> <p>All deliveries and pours are completed in the established loading zone on Golden Grove Street.</p> <p>Stage 2 access and egress for deliveries and trucks will be reviewed in 2022 prior to site establishment of those works.</p>	<p>Established construction works zone - May 2021.</p>
C11	<p>The following hoarding requirements must be complied with:</p> <p>(a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and</p> <p>(b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application.</p>	<p>Council approved hoarding over footpath in association with approved on street work zone. Issues with sensitive existing street trees. Hoarding issued for 8 weeks in error, should have been for 26-30weeks.</p> <p>NSW Govt branding is on the site perimeter fencing on shade cloth</p> <p>No graffiti observed during site audit. During audit, informed was previously graffiti on shade cloth approximately 4-6 weeks ago, replaced within 48 hours.</p>	<p>Confirm and correct hoarding requirements with Council.</p> <p>Maintain records of these actions to note compliance within site diary/ checklist</p>	<p>Application for renewal of Hoarding permit was lodged with Council and Permit issued 30 June 2021.</p> <p>Record of condition of the perimeter shade cloth and hoarding are made through the hazard observations check list in HSEQ inspections kept online in the Hammertech system.</p> <p>It is also detailed in the Hammertech site diary of the WHSE Coordinator.</p> <p>Any graffiti removal or other rectification works will be recorded in this system.</p> <p>There has been no graffiti on either the shade cloth or hoarding since the May 2021 Audit</p>	<p>Hoarding Permit Renewal (App # B/2021/117/1) dated 30 June 2021.</p> <p>Records of condition of the perimeter shade cloth and hoarding are made through the hazard observations check list in HSEQ inspections kept online in the Hammertech system.</p>

Condition ID	Compliance Requirement	Audit findings	Audit Recommendations	Department of Education Actions	Evidence of actions
C17	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 C16.	Limited vibration intensive plant used onsite. As noted in section 8 of the CNVMP, "given the distance of the development site from residential receivers to the west and south, vibration levels are unlikely to exceed the structural damage or amenity vibration criteria." During audit, noted that residential receivers likely further than 30 m, but couldn't confirm (google maps seem to indicate facades could be within 30m if works undertaken on/near western construction boundary).	Update NVMP, with maps indicating proximity to nearby residential receivers (including 30m potential impact zone)	The 30m proximity relates to the use of vibratory compactors only. This type of plant is not in use on site, as such, a 30m impact zone is not relevant. It is noted that worst-case vibration monitoring was undertaken during April 2021 at nearest external structures and showed that construction activities did not exceed residential vibration criteria with the exception of one instantaneous event causing marginal exceedance. Acoustic Engineer has noted: <i>"Given that these activities presented the highest risk of vibration exceedance and generally did not [exceed the criteria], we consider that further construction activities other proposed by A.W Edwards at Darlington Public School not to be of risk to surrounding developments when considering vibration impacts"</i> So in essence, the assumption of the CNVMP that construction activities are unlikely to exceed residential vibration criteria have been shown to be true through on-site monitoring. With respect to vibration, the findings of the monitoring report supersede the predictions made in the CNVMP.	Acoustic Logic Vibration monitoring Report dated 14/05/21.
C27	Adequate provisions must be made to collect and discharge stormwater drainage during construction to the Certifier. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	During construction method of construction water management - lift shaft acting as temp pond and natural seepage into soil. No water discharged offsite. Controls installed, including geofabric covered drains, silt fence and coir logs. ECM(environment control map) includes soil and water management notes, along with ESCP (erosion & sediment Control Plan) included in Appendix 6.15 of the CEMP. Both address soil and construction water management.	Confirm with Bonacci and project team, relevant document to maintain with erosion controls, as works progress to avoid duplication and confusion	Updated (marked up) soil and water management controls plan (C004) is to be kept on site, readily available and on the Contractor's internal network. This document, if required as site conditions change will be sent to Civil Engineer for approval and superseded on site. It is not proposed to update the CEMP to reflect locations of management controls.	Updated control plan approved and document control evidence of superseded versions.