



In accordance, with condition C36 & C37 of the Development Consent, the following document has been submitted to the Planning Secretary for information:

- SSD9354 – Jordan Springs Primary School IA Report Operations #1 Rev 1

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 observations

Attachment A – Response to Independent Audit non-compliances

Condition ID	Compliance Requirement	Audit finding	Audit Recommendation	Proponent's Proposed Action/Action Taken/Response	Evidence	Due Date/Status
A22	CoC A22 requires information and documents (as they are obtained or approved) to be made publicly available on the Project website. This is to occur at least 48 hours before the commencement of construction and until the completion of all works under the consent.	<p>Review of the SINSW website identified the following publication issues:</p> <ul style="list-style-type: none"> - No Pre-Operational Compliance Report as per CRAPR 2018 published on website (although hyperlink provided) (B35). - Required operational documentation not published e.g. D12 Green Travel Plan, D13 OTAMP or D24 Operational and Maintenance Plan (OMP). <p>Operation Compliance Report required to be submitted within 52 weeks from date of commencement of operation by CRPAR (2018) as per Condition B34. Publication on website required within 60 days of submission to the Department as per Condition B35. Submission date of Operation Compliance Report to Department not verifiable at time of audit.</p>	Confirm list of all approved plans - construction and operation that are required on the Project website and update website in accordance with Condition A22.	<p>Some of the finding related to the non-conformance have not been accepted by the Department of Education for the following reasons:</p> <ul style="list-style-type: none"> - Pre-Operational Compliance Report was published within 60 days from the date of submission to DPIE, being 20/07/20. - OMP not an approved plan, as required to be published in accordance with A22. <p>Non-conformance is noted and accepted for the GTP and OTAMP. Both Plans to be published on projectwebsite.</p>	<p>Relevant documentation available on SINSW project website. Refer to website for detailed information. https://www.schoolinfrastructure.nsw.gov.au/projects/j/jordan-springs-new-primary-school.html#category-reports</p>	<p>OPEN</p> <p>To be closed out by 24/11/21</p>
A23	Requires the Applicant to ensure that all 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.	<p>The Pre-Operations Compliance Report (15/07/20) identifies against A23 induction presentations relating to the CEMP and Conditions and references 2 photos (screenshots):</p> <ul style="list-style-type: none"> - SSD 9354 A23 Induction Presentation Photo 1 (no referenceable date). - SSD 9354 A23 Induction Presentation Photo 2 (Jordan Springs site specific and CEMP induction 14/10/19). <p>Neither of these photos relate to operations or provide a direct reference to the CoC. Induction processes would be expected to cover management plan implementation requirements for example OMP (D24) and OWMP (D31) and timing to perform waste collection activities (D32).</p> <p>No evidence provided to demonstrate how this condition has been satisfied.</p>	Employees, contractors (and their subcontractors) to be made aware of details from the consent relevant to the works being carried out.	<p>This nonconformance has not been accepted by the Department of Education.</p> <p>Meetings occurred prior to commencement of D1T3 2020 outlining operational & SSD requirements has been undertaken to comply with condition A23. Confirmation of operational consent conditions provided to staff & stakeholders through multiple Commissioning meetings and stakeholders for several months leading up to commencement of operation.</p>	<p>Meetings where the consent and operational requirements were covered are:</p> <ul style="list-style-type: none"> - Post Operational Meeting, dated 17/7/20 - Operation Transition Meetings - various <p>Detailed evidence can be provided upon request.</p>	<p>CLOSED</p>
A26	The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance.	<p>Non-compliances identified in this Audit Report should have been identified by the Applicant. They haven't been raised and have consequently not been reported in the required timeframe.</p> <p>DPIE confirmed they have not received any non-compliance notifications from the Project.</p>	<p>Applicant to review findings of this Independent Audit Report.</p> <p>Identified non-compliances should be reviewed and reported to the Planning Secretary under this condition.</p>	<p>Non-compliances noted in Response to Audit. Will be addressed in the Non-compliance Letter to DPIE</p>	<p>Non-compliance reported to DPIE week of 23/9/21 to address the absence of a notification provided in the previous IEA audit.</p>	<p>Non-compliance noted.</p> <p>Closed by 1/10/21</p>

Condition ID	Compliance Requirement	Audit finding	Audit Recommendation	Proponent's Proposed Action/Action Taken/Response	Evidence	Due Date/Status
A27	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.	No subsequent notification in absence of reporting identifiable non-compliances.	Applicant to review findings of this Independent Audit Report. Identified non-compliances should be reviewed and reported to the Planning Secretary under this condition.	Non-compliances noted in Response to Audit. Will be addressed in the Noncompliance Letter to DPIE	Non-compliance reported to DPIE week of 10/9/21 to address the absence of a notification provided in the previous IEA audit.	Non-compliant. closed by 1/10/21
D24	Prior to commencement of operation, an Operation and Maintenance Plan (OMP) is to be prepared submitted to the satisfaction of the Certifying Authority along with evidence of compliance with the OMP.	The provided Water Sensitive Urban Design (WSUD) Maintenance Plan (Northrop, 182535 Rev B 01/04/2020) does not address all requirements of the condition: <ul style="list-style-type: none"> - The Plan does not provide relevant contact information for operational implementation. I.e. school/AMU or contract maintenance staff. - The Plan provides relevant WHS requirements for the Ocean Protect Storm Filter but not for the other two structures. No SWMS or other records have been evidenced to demonstrate implementation of the Plan, or compliance with it. No confirmation of Certifier satisfaction with the WSUD Maintenance Plan.	Review and update the WSUD Maintenance Plan to align to the expectations of the consent. Submit the updated WSUD Maintenance Plan to the satisfaction of the Certifying Authority. Retain records as evidence of implementation of the Plan.	This nonconformance has not been accepted by the Department of Education. The Certifier provided acceptance of the plan prior to commencement of operation, on 29/4/20.	Evidence of certifier's acceptance/satisfaction received on 24/4/20. Condition satisfaction table confirming the references to relevant sections of the plan that satisfy the conditions. Certification from Civil Engineer confirming compliance of plan to condition. All listed detailed evidence can be provided upon request.	CLOSED
D31	Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Planning Secretary and Certifying Authority.	The submitted OWMP does not contain all the EIS Appendix W content anticipated by the consent part (d): e.g.: Part 3 Miscellaneous 02: 5. Safety All equipment must have safe operation procedures in place. Appropriate safety signage must be provided. Note 3000L skips are too heavy to be moved by hand. 6. Washing Provide a trapped gully and hot/ cold water mixer tap. Refer to Sydney Water for requirements. Sharps are also to be collected and disposed of by a specialist waste contractor. Chemical waste from any Science Laboratory or Materials Workshop and Visual Arts areas is to be stored in a dedicated store room	Review and update the OWMP to align the Plan to the expectations of the consent. Submit the updated plan to the Planning Secretary and Certifying Authority for information.	Non-compliance noted. The plan to be reviewed and updated to comply with the consent. The updated plan to be submitted to the Certifier and the Planning Secretary.	OWMP rev1 to be submitted to the Certifier and Planning Secretary.	OPEN To be closed out by 24/10/2021.

Condition ID	Compliance Requirement	Audit finding	Audit Recommendation	Proponent's Proposed Action/Action Taken/Response	Evidence	Due Date/Status
		within the preparation area or storage area of the workshops. The waste is to be collected from this point and disposed of by a specialist waste contractor.				
D32	CoC D32 requires waste collection services are to be undertaken outside the hours of 7.30am and 6pm Monday to Friday.	A review of the waste records provided post-site audit covering the period 05/05/2021 - 27/07/2021 showed that of the 39 entries provided, 17 were not outside of the prescribed hours. Waste collection times are not compliant with this condition.	Update the OWMP to include the prescribed waste collection service hours in CoC D32. Communicate the requirements of the waste collection service hours to the contractor per Condition A23.	Non-compliance noted. The plan to be reviewed and updated to include the prescribed waste collection service hours in CoC D32. Waste collection service hours to be communicated to waste contractor.	OWMP rev1 to be submitted to the Certifier and Planning Secretary.	OPEN To be closed out by 24/10/2021.
E3	Condition requires that prior to the commencement of out of hours events (community use) run by the external parties that involve 100 or more people, the Applicant is to prepare an Out of Hours Event Management Plan (Community Use) in consultation with Council and submit it to the Council and Planning Secretary.	The DPIE Notice of decision (5 December 2019) identifies that the Applicant's RTS provided details of proposed school and community use outside normal school hours including the hall for OOSH care, evening performances, presentations and parent teacher nights until 9:30 pm and on Saturdays between 8 am and 6pm and sporting facilities until 6pm weekdays and 8am - 6pm on Saturdays. The decision report identifies conditions for out of school hours event management plans is intended to address these uses. The condition is considered to be directly applicable to OOSH. OOSH care at which 100 or more people attended commenced 27 July 2021. An Out of Hours Event Management Plan (Community Use) has not been prepared prior to the commencement of out of hours events run by external parties involving 100 or more people.	Preparation, consultation and implementation of an Out of Hours Event Management Plan (Community Use) should be effected.	Non-compliance noted. Plan to prepared in accordance with condition E3.	Consultation records with council and plan to be submitted in accordance with E3.	OPEN Noting COVID impact and reduced numbers on site, proposed to be closed out by 15/11/2021.
E4	Condition requires that the Out of Hours Event Management Plan be implemented by the Applicant for the duration of the identified community event or use.	OOSH care commenced either beginning of Term 3 2020 or beginning of Term 4 2020. There is no indication of the date at which 100 or more people threshold was established. On 27/07/21 school Principal confirmed OOSH attendance is currently above 100. School newsletter dated 25/02/21 includes an OSH Club Newsletter confirming they have gained a waiver to increase occupancy to 155.	Preparation, consultation and implementation of an Out of Hours Event Management Plan (Community Use) should be effected.	The new plan will be implemented by the OOSH and will be shared with all event holders prior to any events occurring. All events will be arranged in accordance with this plan and will be available to the school upon request.	To be implemented following satisfaction of condition E3.	OPEN Noting COVID impact and reduced numbers on site, proposed to be closed out by 15/11/2021.
E11	Condition requires short term noise monitoring in accordance with the Noise Policy for Industry where valid data is collected following the commencement of use of each stage of the development. The monitoring program must be carried out by an appropriately qualified person and a monitoring report must be submitted	The Monitoring Report was required to be submitted to the Planning Secretary within 2 months of commencement of operation. Report would be expected to be submitted by 20/09/20. Actual report was submitted 25/10/20.	N/A	Non-compliance noted. This condition was addressed during the time of the submission and was noted due to COVID restrictions attending site to undertake noise monitoring was not possible.	Evidence of submission to Planning Secretary on 15/10/20.	CLOSED

Condition ID	Compliance Requirement	Audit finding	Audit Recommendation	Proponent's Proposed Action/Action Taken/Response	Evidence	Due Date/Status
	to the Planning Secretary within two months of commencement use of each stage of the development to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in the Environmental Noise Assessment for Jordan Springs Public School prepared by Acoustic Logic dated 24 May 2019.			Evidence of submission to Planning on 15/10/20 It is to be noted that the cover letter to Planning states that due to COVID-19 restrictions, entry onto site was restricted to occur past the prescribed 2 months from operation.		
E13	The Green Travel Plan (GTP) required by condition D12 of this consent must be updated annually and implemented unless otherwise agreed by the Planning Secretary.	Update of the Green Travel Plan (prepared by GHD dated 05/08/2021 ref: 12553752 rev 02 provided 06/08/2021) was outside of the 12-month period specified in the Condition.	N/A	This nonconformance has not been accepted by the Department of Education. A review and update of plan occurred within 52 weeks following commencement of operation, that was consistent with the requirement noted in condition D12. The update was ongoing at the time of the Audit and finalised on 5/08/21,	Update of the Green Travel Plan (prepared by GHD dated 05/08/2021	CLOSED



Attachment B – Response to Independent Audit observations

Condition ID	Compliance Requirement	Audit Observation/Opportunity for Improvement	Proponent's Proposed or Completed Action or reason for not implementing measures/changes	Evidence	Due Date/Status
E11	The monitoring program to verify that Operational noise levels do not exceed the recommended noise levels for mechanical plant identified in the Environmental Noise Assessment for Jordan Springs Public School prepared by Acoustic Logic dated 24 May 2019.	Acoustic Logic report recommended volume reduction by not less than 6dB(A) Leq. Sighted certification from Clare Communications Pty Ltd confirming 6dB reduction and insertion of a limiter feature effected 14/10/20. Applicant to consider verification that adopted 6dB noise reduction action achieves required outcomes.	The Department of Education considered the actions associated with noise reduction in accordance with Acoustic Logic Report and Clare Communications certification to be closed out. Clare Communications returned to site to confirm that the particular areas of original concern within the Acoustic Logic Report have in fact been rectified thus verifying the operational noise levels do not exceed the recommended noise levels for mechanical plant in the Environmental Noise Assessment for Jordan Springs Public School prepared by Acoustic Logic dated 24 May 2019.	Sighted certification from Clare Communications Pty Ltd confirming 6dB reduction and insertion of a limiter feature effected 14/10/20.	CLOSED
E13	The Green Travel Plan (GTP) required by condition D12 of this consent must be updated annually and implemented unless otherwise agreed by the Planning Secretary.	Aspirational mode share targets were not included in the Welcome Pack as specified. The update and implementation of the GTP is expected to be able to update progressive performance against the mode share targets specified in the GTP.	Updated the GTP to align to the expectations of CoC D12. See auditor comments under CoC D12 for guidance	Green Travel Plan has since been updated. Further review and investigations have been undertaken. Prior to and following audit, the Green Travel Plan has been updated, i.e. Update of the Green Travel Plan (prepared by GHD dated 05/08/2021). The mode share targets have since been discussed and revised in discussion with the school and community. The performance and use of the plan has been addressed through further investigation and consultation with the school community. The Green Travel Plan has included as part of the communication plan to be shared with the school community for information and implementation.	CLOSED