



NSW Department of Education

Kent Road Public School

(SSD 9344)

SINSW Response to Independent
Environmental Audit Report (IEA)

18 December 2020

Response to Independent Environmental Audit Non-Compliances

Eleven non-compliances have been identified in the IEA report dated 16 December 2020; V4 Final. The non-compliances 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
A2 (a)	Terms of Consent	The Development may only be carried out: (a) in compliance with the conditions of consent	The Independent Environment Audit dated 18 December 2020 identified 7 non-compliances with the conditions of consent.	Non-compliant	The Independent Audit Findings and Recommended actions are as below.	SINSW will address the findings as detailed below.
A2(b)	Terms of Consent	The Development may only be carried out: (b) in accordance with all written directions of the Planning Secretary.	The Independent Environment Audit dated 18 December 2020 identified 7 non-compliances with the conditions of consent.	Non-compliant	The Independent Audit Findings and Recommended actions are as below.	SINSW will address the findings as detailed below.
A3(a)	Terms of Consent	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 required to be, and have been, approved by the Planning Secretary.	There were non-conformances recorded during this audit as such the development was not carried out in line with the conditions of consent. For instance, B13 received a date for submission of (29 May, 2020) no evidence to suggest the proponent implemented this and submitted the relevant documentation.	Non-compliant	The Independent Audit Findings and Recommended actions are as below.	SINSW will address the findings as detailed below.
A3(b)	Terms of Consent	Consistent with the requirements in this consent, the planning Secretary may make written directions to the Applicant in relation to: (b) 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 required to be, and have been, approved by the Planning Secretary; and	There were non-conformances recorded during this audit as such the development was not carried out in line with the conditions of consent. For instance, B13 received a date for submission of (29 May, 2020) no evidence to suggest the proponent implemented this and submitted the relevant documentation.	Non-compliant	The Independent Audit Findings and Recommended actions are as below.	SINSW will address the findings as detailed below.
A3(c)	Terms of Consent	Consistent with the requirements in this consent, the planning Secretary may make written directions to the Applicant in relation to: (c) The implementation of any actions or measures contained in any such document referred to in (a) above.	There were non-conformances recorded during this audit as such the development was not carried out in line with the conditions of consent. For instance, B13 received a date for submission of (29 May, 2020) no evidence to suggest the proponent implemented this and submitted the relevant documentation.	Non-compliant	The Independent Audit Findings and Recommended actions are as below.	SINSW will address the findings as detailed below.
B13	Ecologically Sustainable Development	Prior to the commencement of constructions (excluding earthworks), the Applicant must register for a minimum of 4-star Green Star with the Green Building Council Australia and submit evidence of registration to the Certifying Authority, unless an alternate certification process (and timing) is agreed to by the Planning Secretary.	A number of extensions of time for the provision of an alternate certification process have been approved by the Planning Secretary. The last agreed extension for submission was 29 May 2020. Currently no further extension has been approved by the Planning Secretary.	Non-compliant	Proponent to finalise the requirements of B13.	SINSW submitted a Non-Compliance Notification on 10 July 2020 and is currently finalizing its alternative certification pathway with the DPIE.
C52	Outdoor Lighting	Within 3 months of commencement of construction, evidence must be submitted to the satisfaction of the Certifying authority that all outdoor lighting within the site has been designed to comply with AS 1158.3.1:2005 Lighting for Roads and Public Spaces - Pedestrian Area (Category P) Lighting - Performance and Design Requirements, AS 1158.4:2015 - Lighting for Roads and Public Spaces - Lighting for Pedestrian Crossings and AS 4282 -1997 Control of the Obtrusive Effects of Outdoor Lighting.	Evidence was submitted to the Certifying Authority's satisfaction more than 3 months after the commencement of Construction. As sign off did not occur within 3 months of commencement of construction it will therefore remain non-compliant. This was advised to the Department of Planning, Industry and Environment on 13 May 2020.	Non-compliant	This Non-compliance sighted as advised to the Department of Planning, Industry and Environment on 13 May 2020.	SINSW addressed this condition as soon as it became aware of the non-compliance. No further action required.

Response to Independent Environmental Audit Recommendations

One recommendation was included in the IEA report dated 16 December 2020, V4 Final. 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
C28	Erosion & Sediment Control	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 stabilized and rehabilitated so that it no longer acts as a source of sediment.	The auditor noted during the site inspection that there should be measures in place to protect the internal drainage which now connects to OSD which then connects to offsite drainage. Sediment would collect in the OSD but there is a risk it may still be leaving the site.	Compliant	Subsequent to the audit, St Hilliers Project Manager (Ben Owens) on 27 November 2020 provided photographic evidence that sandbags had been added to the active sides, along with geofabric added to stop sediments entering the stormwater system. This item is still open as St Hilliers did not have enough sandbags to complete the measures at the time of the e-mail (27 November 2020)	SINSW to instruct the St Hilliers to complete the sandbag installation ASAP in December 2020.