



INDEPENDENT AUDIT REPORT



KINGSCLIFF HIGH SCHOOL UPGRADE – SSD 8744305

APRIL 2022

Authorisation

Author name	Ann Azzopardi	Reviewer / approver name	Peter Hatton
Author position	Lead Auditor	Review position	Principal Environmental Auditor
Author signature		Reviewer / approver signature	
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Prepared for:

School Infrastructure NSW
Level 8, 259, George Street
Sydney, NSW 2000

Prepared by:

WolfPeak Pty Ltd

T: 1800 979 716

W: www.wolfpeak.com.au

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Executive Summary 6

1. Introduction..... 8

1.1 Project overview 8

1.2 Approval requirements..... 10

1.3 The audit team 10

1.4 The audit objectives..... 10

1.5 Audit scope..... 10

2. Audit methodology 12

2.1 Audit process..... 12

2.2 Audit process detail 13

2.2.1 Audit initiation and scope development..... 13

2.2.2 Preparing audit activities 13

2.2.3 Site personnel involvement..... 14

2.2.4 Meetings..... 14

2.2.5 Interviews 14

2.2.6 Site inspection 14

2.2.7 Document review..... 15

2.2.8 Generating audit findings..... 15

2.2.9 Compliance evaluation 15

2.2.10 Evaluation of post approval documentation 15

2.2.11 Completing the audit..... 16

3. Audit findings..... 17

3.1 Approvals and documents audited and evidence sighted 17

3.2 Non-compliance, Observations and Actions 17

3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents22

3.4 Summary of notices from agencies..... 22

3.5 Other matters considered relevant by the Auditor or DPIE..... 22

3.6 Complaints 22

3.7 Incidents..... 23

3.8 Actual versus predicted impacts 23

4. Conclusions	24
5. Limitations	25
Appendix A – SSD-8744305 Conditions of consent.....	26
Appendix B – CEMP & Sub-Plan Mitigation Measures	67
Appendix C – Planning Secretary Agreement of Independent Auditors	78
Appendix D – Consultation Records	81
Appendix E – Site Inspection Photographs	85
Appendix F – Declaration Forms	94

EXECUTIVE SUMMARY

The NSW Department of Education – Schools Infrastructure NSW (SINSW) is responsible for delivering the Kingscliff High School Redevelopment Project (the Project). The Project involves upgrades to the school to provide new permanent teaching spaces and core facilities to accommodate increased student capacity and to address the Education Facilities Standards and Guidelines (EFSG). Consent for the Project, State Significant Development (SSD) 8744305, was granted on 3 November 2021, subject to a number of Conditions of Consent (conditions).

The scope of the Project includes demolition works to part of existing buildings, additions to existing buildings, construction of a new two (2) storey creative and performing arts (CAPA) building, covered outdoor learning area (COLA), refurbishment works to existing buildings and new landscaping of the school grounds.

MBB Group has been appointed as the client representative on behalf of SINSW. Richard Crookes Construction (RCC) is the principal contractor. The Principal Certifying Authority (the Certifier) is Blackett, Maguire & Goldsmith Pty Ltd (BM+G).

Conditions C36 to C41 of Schedule 2 of SSD 8744305 set out the requirements for undertaking Independent Audits. The conditions give effect to the Department of Planning and Environment (the Department) 2020 document entitled *Independent Audit Guideline Post Approval Requirements* (IAPAR). The IAPAR sets out the scope, methodology and reporting requirements for the Independent Audit.

The objective of this Independent Audit is to satisfy SSD 8744305 Schedule 2, condition C37, which states:

Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.

This Independent Audit sought to verify compliance with the relevant conditions and assess the effectiveness of environmental management on the Project using the scope, methodology and reporting requirements from the IAPAR.

This Audit Report presents the findings from the first Independent Audit for construction, covering the period from the granting of consent (3 November 2021) and 14 March 2022 (the 'audit period'). Works undertaken during this period included site establishment, utility works, ground investigation works, and installation of the covered outdoor learning area (COLA).

The overall outcome of the Independent Audit was positive. All compliance records were organised and available at the time of the site inspection and interviews with Project personnel. Relevant environmental and compliance monitoring records were being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements.

In summary:

- There were 180 conditions assessed.
- Three (3) non-compliances were identified against the conditions. These relate to submission of demolition work plans, preparation of Hazardous Materials Management Plan, and carrying out of inspections during construction in line with CEMP requirements.
- Four (4) observations were identified in relation to the conditions. These relate to upload of the latest version of documents to the Project website, accuracy of content in the Site Induction presentation, and Aboriginal heritage induction and unexpected finds procedure.

Detailed findings are presented in Section 3, along with actions proposed or undertaken by the Project team to address the findings.

The Auditor would like to thank the auditees from SINSW, MBB Group, and Richard Crookes Constructions for their high level of organisation, cooperation, and assistance during the Independent Audit.

1. INTRODUCTION

1.1 Project overview

The NSW Department of Education – Schools Infrastructure NSW (SINSW) is responsible for delivering the Kingscliff High School Redevelopment Project (the Project). The Project involves upgrades to the school to provide new permanent teaching spaces and core facilities to accommodate increased student capacity and to address the Education Facilities Standards and Guidelines (EFSG).

The scope of the Project includes demolition works to part of existing buildings, additions to existing buildings, construction of a new two (2) storey creative and performing arts (CAPA) building, covered outdoor learning area (COLA), refurbishment works to existing buildings and new landscaping of the school grounds.

This includes the following activities:

- Partial demolition of the existing administration building, car park, pathways and internal demolition works of existing homebases.
- Construction of the following new buildings and structures
 - A new two (2) storey creative and performing arts (CAPA) building and amenities building adjacent to the existing dance studio, to provide an integrated visual arts, music and performance facility;
 - Alterations and additions to the existing single storey administration building; and
 - A new covered outdoor learning area (COLA) adjacent to the existing hall
- Refurbishment of existing learning spaces to meet minimum size requirements under the EFSG and changes to the learning spaces;
- Increase in student enrolment capacity to accommodate future growth from 1104 to 1400 enrolments and associated increase in staff from 84 to 106;
- Reconfiguration and resurfacing of the existing car park and provision of new bicycle parking. The car parking on site will be reduced from 98 to 89 spaces to accommodate the CAPA building;
- Tree removal, tree replacement and new landscaped embellishment; and
- Miscellaneous off-site works, including upgrades to nearby road crossings and footpaths, as agreed with Tweed Shire Council, to enhance pedestrian access to the site from bus stops and the surrounding areas.

A map of the Project site is provided in Figure 1, and drawing of the proposed works is included in Figure 2.

Consent for the Project, State Significant Development (SSD) 8744305, was granted on 3 November 2021, subject to a number of Conditions of Consent (conditions).



Figure 1: The Project site (Source: Kingscliff High School Environmental Impact Statement for State Significant Development (SSD-8744305), SJB Planning, dated 19 May 2021)

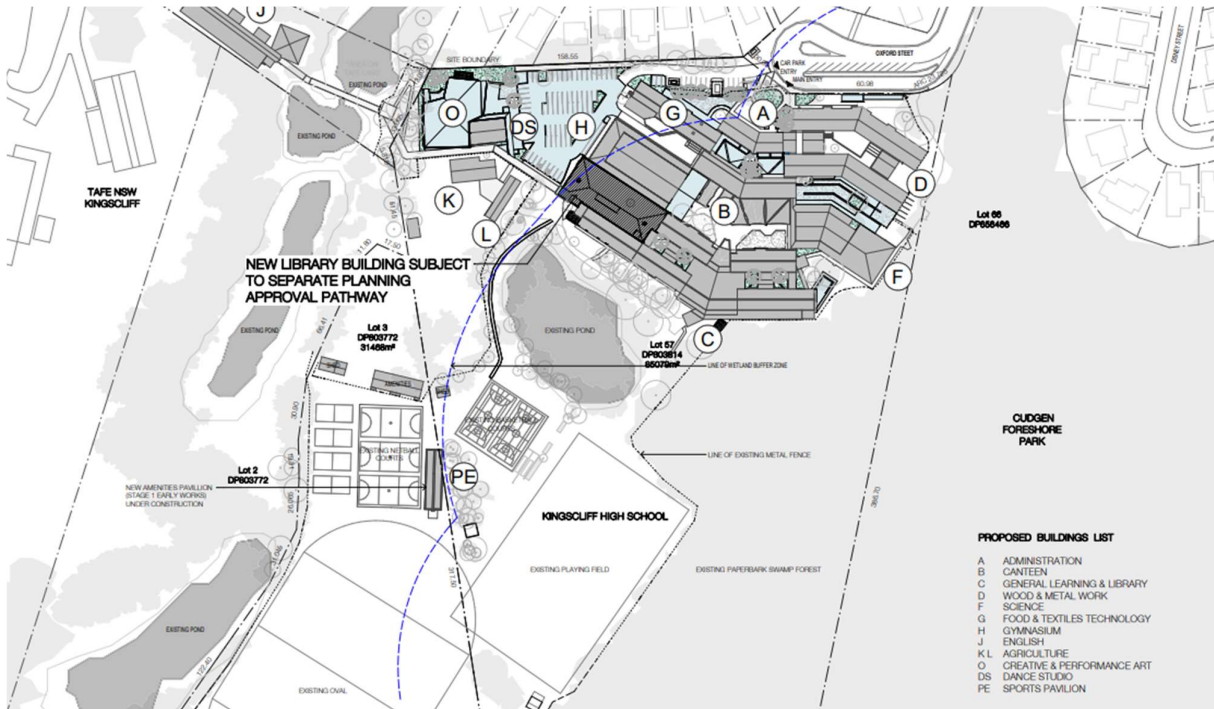


Figure 2: Proposed works under SSD 8744305 (Source: Kingscliff High School Architectural Package, SJB Group, dated 27 April 2021)

MBB Group has been appointed as the client representative on behalf of SINSW. Richard Crookes Construction (RCC) is the principal contractor. The Principal Certifying Authority (the Certifier) is Blackett, Maguire & Goldsmith Pty Ltd (BM+G).

Notification of commencement of works and construction was provided to the Department on 20 December 2021. Works undertaken during the audit period (i.e., from 20 December 2021 to 14 March 2022) included site establishment, utility works, ground investigation works, and installation of the covered outdoor learning area (COLA).

1.2 Approval requirements

Conditions C36 to C41 of Schedule 2 of SSD 8744305 set out the requirements for undertaking Independent Audits. The conditions give effect to the Department of Planning and Environment (the Department) 2020 document entitled *Independent Audit Guideline Post Approval Requirements* (IAPAR). The IAPAR sets out the scope, methodology and reporting requirements for the Independent Audit.

1.3 The audit team

In accordance with Section 3.1 of the IAPAR, Independent Auditors must be suitably qualified, experienced, and independent of the Project, and appointed by the Planning Secretary.

The Audit Team comprises:

- Ann Azzopardi (Auditor): Bachelor of Science (Hons), Exemplar Global Certified Lead Environmental Auditor (Certificate No 208582)
- Derek Low (Auditor Lead): Master of Environmental Engineering Management, Exemplar Global Certified Principal Environmental Auditor (Certificate No 114283)

Approval of the Audit Team was provided by the Department on 1 December 2021. The letter is presented in Appendix C.

1.4 The audit objectives

The objective of this Independent Audit is to satisfy SSD 8744305 Schedule 2, condition C37, which states:

Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.

This Independent Audit sought to verify compliance with the relevant conditions and assess the effectiveness of environmental management on the Project using the scope, methodology and reporting requirements from the IAPAR.

1.5 Audit scope

This Independent Audit relates to the Project works between the granting of consent (3 November 2021) and 14 March 2022.

The scope of the Independent Audit comprises:

- an assessment of compliance with:
 - all conditions of consent applicable to the phase of the development that is being audited
 - all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and
 - all environmental licences and approvals applicable to the development excluding environment protection licences issued under the Protection of the Environment Operations Act 1997.
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment
 - the physical extent of the development in comparison with the approved boundary
 - incidents, non-compliances and complaints that occurred or were made during the audit period
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and
 - feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period
- a review of the status of implementation of previous Independent Audit findings, recommendations and actions (if any)
- a high-level review of the project's environmental management systems
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

2. AUDIT METHODOLOGY

2.1 Audit process

The Independent Audit was conducted in a manner consistent with AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems and the methodology set out in the Department’s IAPAR. An overview of the audit activities, as specified in AS/NZS ISO 19011, is presented in Figure 3.

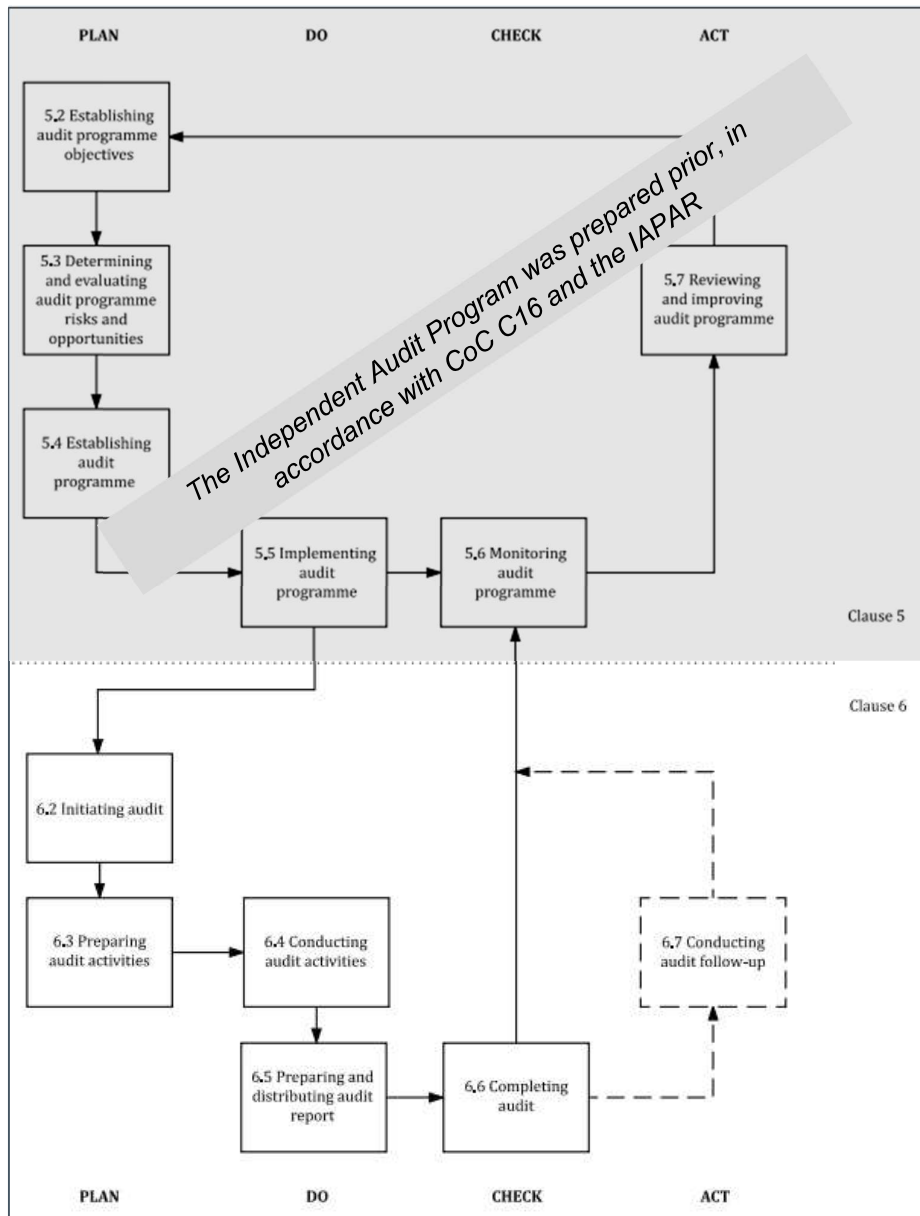


Figure 3: Audit activities overview (modified from AS/NZS ISO 19011). Subclause numbering refers to the relevant subclauses in the Standard.

2.2 Audit process detail

2.2.1 Audit initiation and scope development

Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the Auditee.
- Confirm the audit team.
- Confirm the audit purpose, scope and criteria.

On 16 February 2022, WolfPeak consulted with the Department to obtain their input into the scope of the Independent Audit in accordance with Section 3.2 of the IAPAR. The consultation records are presented in Appendix D. No response was received from the Department and the Independent Audit was conducted in accordance with the IAPAR.

2.2.2 Preparing audit activities

The Auditor performed a document review, prepared an audit plan, and prepared work documents (audit checklists) and distributed to the Project team in preparation for the Independent Audit.

The primary documents reviewed prior to and after the site visit are as follows:

- *Kingscliff High School Environmental Impact Statement for State Significant Development (SSD-8744305)*, SJB Planning, dated 19 May 2021 (the EIS)
- *Response to Submissions (RtS) – Kingscliff High School Redevelopment – SSD-8744305*, SJB Planning, 2 September 2021 (the RtS)
- *Development Consent SSD-8744305, Upgrades to Kingscliff High School*, 3 November 2021
- *Construction Environmental Management Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 3, 9 December 2021
- *Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School*, Richard Crookes Constructions, Revision 9, 1 March 2022
- *Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 4, 9 December 2021
- *Construction Waste Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 2, 9 December 2021
- *Construction Soil and Water Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 3, 9 December 2021
- *Biodiversity Management Sub-Plan – Kingscliff High School Upgrade*, Kleinfelder, Rev 2.0, 9 December 2021
- *Flood Emergency Response Sub-Plan – Kingscliff High School*, Molino Stewart, Rev 2.0, 2 December 2021

2.2.3 Site personnel involvement

The on-site audit activities took place on Monday, 14 March 2022. The following personnel took part in the audit:

- Gareth James, SINSW
- Adam Klink, SINSW
- Laura Goodall, Project Manager, MBB Group
- Martyn Charlett, MBB Group
- Brad Embury, MBB Group
- Craig Mann, RCC
- Richie O’Gorman, RCC
- Todd Williams, RCC
- Oscar Sargeson, RCC
- Blake Bale, RCC
- Ann Azzopardi, WolfPeak (Lead Auditor).

2.2.4 Meetings

Opening and closing meetings were held with the Auditor and Project personnel.

During the opening meeting, held remotely via Microsoft Teams on 7 March 2022, the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed.

At the closing meeting, held remotely via Microsoft Teams on 30 March 2022, preliminary audit findings were presented, preliminary recommendations (as appropriate) were made, timing for finalisation of the audit report and any post-audit actions were confirmed.

2.2.5 Interviews

The Auditor conducted interviews during the site inspection with key personnel involved in Project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development. All other communication was conducted remotely, which included detailed request for information and auditee responses to the request. Interviews were conducted across two meetings between 7 March 2022 and 14 March 2022.

2.2.6 Site inspection

The on-site audit activities took place on Monday, 14 March 2022. The on-site audit activities included an inspection of the site and work activities. Photos are presented in Appendix F.

It is noted that the site inspection was originally planned for Monday, 7 March 2022; however, this was postponed due to the severe rainfall and flooding occurring on the NSW North Coast. The new

date of the site inspection met the timeframe of 12 weeks from commencement of construction, as per the IAPAR.

2.2.7 Document review

The Independent Audit included investigation and review of Project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The documents sighted are included within Appendices A and B.

2.2.8 Generating audit findings

Independent Audit findings were based on verifiable evidence. The evidence included:

- relevant records, documents and reports
- interviews of relevant site personnel
- photographs
- figures and plans; and
- site inspections of relevant locations, activities and processes.

2.2.9 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the IAPAR, as listed in Table 1, below:

Table 1: Compliance descriptors from Table 2 of the IAPAR

Status	Description
Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Observations and notes may also be made to provide context, identify opportunities for improvement or highlight positive initiatives.

2.2.10 Evaluation of post approval documentation

The Auditor assessed whether post approval documents:

- have been developed in accordance with the CoCs and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate.
- have been implemented in accordance with the CoCs and all other environmental licences and approvals applicable to the Project (if any).

The adequacy of post approval documents was determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document.
- whether there are any opportunities for improvement.

2.2.11 Completing the audit

The Independent Audit Report was distributed to the proponent to check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented.

3. AUDIT FINDINGS

3.1 Approvals and documents audited and evidence sighted

The documents audited comprised all the conditions from Schedule 2 of SSD 7709 applicable to the works being undertaken, and selected mitigation measures and commitments from the following plans:

- *Construction Environmental Management Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 3, 09/12/2021
- *Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School*, Richard Crookes Constructions, Revision 9, 01/03/2022
- *Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 4, 09/12/2021
- *Construction Waste Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 2, 09/12/2021
- *Construction Soil and Water Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 3, 09/12/2021
- *Biodiversity Management Sub-Plan – Kingscliff High School Upgrade*, Kleinfelder, Rev 2.0, 09/12/2021
- *Flood Emergency Response Sub-Plan – Kingscliff High School*, Molino Stewart, Rev 2.0, 02/12/2021

The evidence sighted against each requirement is detailed within Appendices A and Appendix B.

3.2 Non-compliance, Observations and Actions

This section, including Table 2, presents the non-compliance and observations from the Independent Audit. Actions in response to each of the findings are also presented. Detailed findings against each requirement are presented in Appendix A.

In summary:

- There were 180 conditions assessed.
- Three (3) non-compliances were identified against the conditions. These relate to submission of demolition work plans, preparation of Hazardous Materials Management Plan, and carrying out of inspections during construction in line with CEMP requirements.
- Four (4) observations were identified in relation to the conditions. These relate to upload of the latest version of documents to the Project website, accuracy of content in the Site Induction presentation, and Aboriginal heritage induction and unexpected finds procedure.

Table 2: Audit findings and actions

Item	Ref.	Type	Details of item	Recommended or completed actions	By whom and by when	Status
Findings from the first Independent Audit						
SSI 10051 Conditions of Approval						
8744305_IA1_01	A27	Observation	<p>Requirement: <i>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:</i></p> <p>a) <i>make the following information and documents (as they are obtained or approved) publicly available on its website:</i></p> <ul style="list-style-type: none"> i. <i>the documents referred to in condition A2 of this consent;</i> ii. <i>all current statutory approvals for the development;</i> iii. <i>all approved strategies, plans and programs required under the conditions of this consent;</i> iv. <i>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;</i> v. <i>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;</i> vi. <i>a summary of the current stage and progress of the development;</i> vii. <i>contact details to enquire about the development or to make a complaint;</i> viii. <i>a complaints register, updated monthly;</i> ix. <i>audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;</i> x. <i>any other matter required by the Planning Secretary; and</i> <p>b) <i>keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.</i></p> <p>Observation: The latest version of the CTPMSP (Revision 9, 01/03/2022) has not been uploaded to the Project website. Whilst the CEMP and Sub-Plans are not required to be approved (and subsequently uploaded to the Project website under A27(a)(iii)), previous versions of the plans have been uploaded to the website, therefore it is recommended that the revised CTPMSP be uploaded to the website for consistency.</p>	<p>The revised CTPMSP (Revision 9, 01/03/2022) has now been uploaded to the Project website, replacing the previous revision:</p> <p>https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/k/kingscliff-high-school/2022/mar/B15d_B16_-_KHS_Construction_Traffic_Pedestrian_Management_Sub_Plan_-_V9.pdf</p>	SINSW	CLOSED
8744305_IA1_02	B13	Non-compliance	<p>Requirement: <i>Prior to the commencement of construction, demolition work plans required by AS 2601-2001 The demolition of structures (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier and Planning Secretary.</i></p> <p>Non-compliance: Records show that the demolition work plans were submitted to the Department on 21/12/2021, which was one day after the commencement of construction (20/12/2021, as notified by INSW to DPE under B1).</p>	<p>The demolition work plans were submitted to the Department on 21/12/2021, no further action is required.</p>	SINSW	CLOSED

Item	Ref.	Type	Details of item	Recommended or completed actions	By whom and by when	Status
874430 (5_IA1_03)	B35	Non-compliance	<p>Requirement: <i>Prior to the commencement of construction, the Applicant is required to submit a Hazardous Materials Management Plan to the Certifier. The report must:</i></p> <ol style="list-style-type: none"> <i>address the recommendations in the Hazardous Materials Survey for Kingscliff High School at 33 Oxford Street, Kingscliff prepared by Hazmat Services Pty Ltd, dated 31 March 2020 and Waste Management Plan for Kingscliff High School at 33 Oxford Street, Kingscliff prepared by HMC Environmental Consulting Pty Ltd dated March 2021;</i> <i>provide details of management of risks associated during demolition work and for any remaining in-situ hazardous materials located at the site; and</i> <i>comply with the relevant NSW Legislation, Codes and Practice and Australian Standards.</i> <p>Non-compliance: A Hazardous Materials Management Plan has not yet been prepared for the Project and submitted to the Certifier, despite construction commencing on 21/12/2021. Whilst works associated with hazardous material management are yet to commence, the Project has not prepared a Staging Report for construction, therefore there is no flexibility recognised in the timing of this condition.</p> <p>The auditees cited that a number of documents have been issued to the Certifier regarding future demolition works, including Demolition Management Plan (B13), Demolition Compliance Statement from Demex (C3), and an unexpected contamination finds procedure. However, these documents do not negate the need for a Hazardous Materials Management Plan to be prepared under B35.</p>	<p>A Hazardous Materials Management Plan is to be prepared for the Project in accordance with B35 and submitted to the Certifier.</p> <p>The auditees provided a draft Hazardous Materials Management Plan, dated 28/04/2022.</p>	<p>SINSW / RCC</p> <p>Prior to commencement of works associated with hazardous material management, or by 31/05/2022 (whichever occurs first)</p>	OPEN
8744305_IA1_04	C4	Observation	<p>Requirement: <i>Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:</i></p> <ol style="list-style-type: none"> <i>between 7am and 6pm, Mondays to Fridays inclusive; and</i> <i>between 8am and 1pm, Saturdays.</i> <p><i>No work may be carried out on Sundays or public holidays.</i></p> <p>Observation: The site induction only notes that site hours are 7 am – 5 pm and does not specify days of work or clarity around weekend hours. The auditor recommends that the site induction presentation be updated to include full hours of work, as per C4.</p>	<p>The auditor recommends that the Project induction presentation be updated to ensure clarity around approved construction hours across all days of the week.</p>	<p>RCC</p> <p>31/05/2022</p>	OPEN
8744305_IA1_05	C9	Non-compliance	<p>Requirement: <i>The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).</i></p> <p>Non-compliance: A review was conducted to verify whether the Project was being delivered in accordance with the CEMP and Sub-Plans, and a non-compliance has been identified against the commitment for the ESR to conduct weekly and post-rainfall inspections of site environmental controls as per section 1.11.2 of the CEMP. The auditees advised that the frequency of inspections was affected by the significant rainfall events and flooding that occurred in the area since construction commencement, as well as COVID-19.</p> <p>Understanding that the ability to conduct weekly inspections has been limited by these events, the auditor notes that there is no record of post-rainfall inspections being undertaken on the Project, despite numerous significant rainfall events occurring this year. This has been raised as a non-compliance against C9.</p> <p>The auditor also makes the following observations in relation to the requirement to construct the development in accordance with the CEMP and Sub-Plans:</p> <ul style="list-style-type: none"> CTPMSP, Section 9 – The auditees noted that the requirement to inspect traffic control devices a minimum of three times daily was meant to be specifically related to electronic traffic control devices (which have not yet been used on the Project). The auditees noted that Section 9 of the CTPMSP was going to be amended to correct this in the latest revision of the Plan, however this has not been rectified. 	<p>The auditor recommends that the Project establishes an environment inspection schedule and register to ensure/ demonstrate inspections are being conducted weekly and post-rainfall.</p> <p>The auditor recommends that Section 9 of the CTPMSP is updated to clarify that the frequency of inspecting traffic control devices (minimum of three times daily) relates specifically to electronic traffic control devices.</p>	<p>RCC</p> <p>31/05/2022</p> <p>RCC</p> <p>14/06/2022</p>	<p>OPEN</p> <p>OPEN</p>

Item	Ref.	Type	Details of item	Recommended or completed actions	By whom and by when	Status
			<ul style="list-style-type: none"> CSWMSP, Section 6.1.2.1 – The version of the site ERSD plan observed at the time of the audit did not fully reflect the controls in place onsite, showing use of a rumble grid at site entrance and instead of the gabion rumble grid that has been installed at the compound egress gate. 	The site ERSD Plan has been updated to reflect the change from rumble grid at site entrance to gabion rumble grid at compound egress gate.	RCC	CLOSED
			<ul style="list-style-type: none"> CSWMSP, Section 6.2 – There appears to be a misunderstanding around base line surface water monitoring and its applicability to the Project. There is no evidence of base line monitoring being conducted as per the CWSMP and the auditor observes that there have been no discharges on the Project to date. The auditor recommends reviewing this commitment given that construction has commenced and that the window to conduct base line monitoring has now passed. 	The auditor recommends that the Project reviews commitments made around base line surface water monitoring and update the CSWMSP as required.	RCC 31/05/2022	OPEN
			<ul style="list-style-type: none"> BMSP, Section 3.2, Table 6 – The BMSP requires all Project personnel to be made aware of all matters regarding fauna management, particularly in relation to the Bush Stone-curlew. The Bush Stone-curlew Management Plan also notes that at Kingscliff High School, this species would potentially use the school grounds and surrounding vegetation. The Project Site Induction includes a map detailing environmental exclusion zones; however, it does not specifically reference the Bush Stone-curlew and its potential to nest or roost within the and around the school. All Project personnel should be made aware of the potential for this species to occur within the work area and what to do if found onsite. 	The auditor recommends that the Project reviews the Site Induction presentation and revises to include content regarding fauna management and specifically reference the Bush Stone-curlew and its potential to nest or roost within the and around the school. This should include detail around actions to be undertaken if this species is found on site.	RCC 31/05/2022	OPEN
			<ul style="list-style-type: none"> BMSP, Section 3.3, Table 7 – The Project is required to conduct weed survey prior to commencement of any construction activities. The auditees advised that weed management is being undertaken by a land maintenance contractor (Justin Barlow Gardening Services). It is not clear whether weed survey and management has been conducted by a suitably qualified and experienced person, as required under the BMSP. This has been raised as an observation against C9. 	The auditor recommends reviewing the land maintenance contractor's qualifications to establish whether they meet the requirements of a suitably qualified and experience person in relation to conducting weed surveys and advising on best practice management.	RCC 31/05/2022	OPEN
			<ul style="list-style-type: none"> FERP, Section 6.1.1 – The first step in the Flood Emergency Response Plan in section 6 of the FERP includes the following action: "Actions from Section 4.3 of this report will be included in the WHS site induction." The auditor noted that section 4.3 of the report (FERP) is a brief section on site flooding and does not include any actions. 	<p>The Project has reviewed and updated the FERP to correct the identified error in the Flood Emergency Response Plan in section 6 (sighted FERP Revision 3.0, dated 03/05/2022).</p> <p>The updated Plan is to be submitted to the Planning Secretary and Certifier.</p>	SINSW To be submitted within 6 weeks of being revised	OPEN

Item	Ref.	Type	Details of item	Recommended or completed actions	By whom and by when	Status
8744305_IA1_06	C26	Observation	<p>Requirement: <i>Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by EMM Consulting dated April 2021.</i></p> <p>Observation: Section 4.3.1 of the ACHA report prepared by EMM requires the following:</p> <p>“All employees, contractors, sub-contractors involved in ground-disturbing activities will undergo an Aboriginal cultural heritage induction. For key project team members, this will be conducted by a representative of the RAPs prior to any ground-disturbance.”</p> <p>Evidence has been provided of some Project personnel from RCC, MBB Group, and SINSW undergoing an Aboriginal cultural heritage induction in July 2021, presented by Tweed Byron Local Aboriginal Land Council (LALC). However, there is no evidence to demonstrate further induction of employees, contractors, sub-contractors involved in ground-disturbing activities (noting that ground investigation works that were taking place onsite at the time of the site inspection). Understanding these works are minor, the Project is to ensure that the above requirement is met prior to commencement of excavation activities onsite.</p>	<p>Evidence provided of Project personnel, including subcontractors, attending an Aboriginal cultural heritage induction presented by Tweed Byron LALC on 08/04/2020.</p> <p>Project to ensure that future personnel onboarded to conduct ground disturbance activities undergo an Aboriginal cultural heritage induction (in line with the ACHA).</p>	RCC	CLOSED
8744305_IA1_07	C27	Observation	<p>Requirement: <i>In the event that surface disturbance identifies a new Aboriginal object:</i></p> <ol style="list-style-type: none"> <i>all works must halt in the immediate area to prevent any further impacts to the object(s);</i> <i>a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects;</i> <i>the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS;</i> <i>the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and</i> <i>works shall only recommence with the written approval of the Planning Secretary</i> <p>Observation: The Aboriginal heritage unexpected finds protocol in the CEMP and ACHMP does not include the requirement that, following identification of a new Aboriginal object, works can only recommence with the written approval of the Planning Secretary, as per C27(e).</p>	<p>The Aboriginal heritage unexpected finds protocol included in the CEMP and ACHMP has been updated to include the requirement for written approval from the Planning Secretary prior to recommencement of works, as per C27(e).</p> <p>The updated Plans were submitted to the Certifier on 17/04/2022 and the Planning Secretary on 02/05/2022.</p>	SINSW / RCC	CLOSED

3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents

The adequacy of post approval documents must be determined on the basis of whether:

- There are any non-compliances resulting from the implementation of the document, and
- There are any opportunities for improvement.

A review was conducted of the:

- *Construction Environmental Management Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 3, 09/12/2021
- *Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School*, Richard Crookes Constructions, Revision 9, 01/03/2022
- *Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 4, 09/12/2021
- *Construction Waste Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 2, 09/12/2021
- *Construction Soil and Water Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 3, 09/12/2021
- *Biodiversity Management Sub-Plan – Kingscliff High School Upgrade*, Kleinfelder, Rev 2.0, 09/12/2021
- *Flood Emergency Response Sub-Plan – Kingscliff High School*, Molino Stewart, Rev 2.0, 02/12/2021

The plans are adequate for the works being undertaken.

3.4 Summary of notices from agencies

To the Auditors knowledge no formal notices were issued by the Department during the audit period.

3.5 Other matters considered relevant by the Auditor or DPIE

Other than the matters identified in Section 3.2, there were no other matters considered relevant by the Auditor. During consultation, the Department did not request any additional issues for inclusion within the scope of the audit that were not already captured by Section 3.3 of the IAPAR.

3.6 Complaints

A complaints register is being maintained for the entire MLP development. The auditees advised that no complaints have been received on the Project to date. The complaints register is published on the Project website.

https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/k/kingscliff-high-school/feb-2022/Kingscliff_High_School_-_complaints_register_-_February_2022.pdf

3.7 Incidents

The Project has not identified any reportable incidents during the audit period.

3.8 Actual versus predicted impacts

Predicted outcomes associated with the construction of the Project are described in Section 6 of the *Kingscliff High School Environmental Impact Statement for State Significant Development (SSD-8744305)*, 19 May 2021 (the EIS) and in the *Response to Submissions (RtS) – Kingscliff High School Redevelopment – SSD-8744305*, SJB Planning, 2 September 2021 (the RtS)

The EIS and RtS included a range of studies and predictions that relied on observation, measurement and modelling of the existing environments and potential outcomes arising from the Project. Full assessment of the accuracy of these predictions would also require a significant number of studies involving measurement and modelling using actual data points as inputs. Other than the construction requirements specified in the conditions and mitigation measures, to the Auditor's knowledge there are no requirements to undertake such studies and doing so does not form part of this Independent Audit. Any such comparison is qualitative only.

Construction commenced on 20 December 2021. Works completed during the current audit period (i.e.: from the granting of approval on 3 November 2021 to 14 March 2022) were largely limited to early works and site establishment activities, including compound establishment, some tree removal, utility works, ground investigation works, and installation of the covered outdoor learning area (COLA).

The majority of Project works had yet to commence, including:

- Demolition works
- Construction of CAPA building and amenities building adjacent to the existing dance studio
- Alterations and additions to the existing single storey administration building
- Refurbishment of existing learning spaces
- Reconfiguration and resurfacing of the existing car park

These works that have not yet commenced are likely to be associated with greater environmental impacts.

Given the relatively limited nature of the works undertaken during the audit period, the environmental impacts are mostly minor or negligible and qualitatively well within that predicted by the EIS and RtS.

4. CONCLUSIONS

This Audit Report is the first Independent Audit for the construction period, covering the period from the granting of consent (3 November 2021) to 14 March 2022.

The overall outcome of the Independent Audit was positive. Compliance records were organised and available at the time of the site inspection and interviews with Project personnel from MBB Group and RCC.

Relevant environmental and compliance monitoring records were being collected and reported as required to provide verification of compliance to statutory requirements and the broader Project environmental requirements.

In summary:

- There were 180 conditions assessed.
- Three (3) non-compliances were identified against the conditions. These relate to submission of demolition work plans, preparation of Hazardous Materials Management Plan, and carrying out of inspections during construction in line with CEMP requirements.
- Four (4) observations were identified in relation to the conditions. These relate to upload of the latest version of documents to the Project website, accuracy of content in the Site Induction presentation, and Aboriginal heritage induction and unexpected finds procedure.

Detailed findings are presented in Section 3, along with actions proposed or undertaken by the Project team to address the findings.

The Auditor would like to thank the auditees from SINSW, MBB Group, and Richard Crookes Constructions for their high level of organisation, cooperation, and assistance during the Independent Audit.

5. LIMITATIONS

This Document has been provided by WolfPeak Pty Ltd (WolfPeak) to the Client and is subject to the following limitations:

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APPENDIX A – SSD-8744305 CONDITIONS OF CONSENT

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status																																																																																												
Part A Administrative conditions																																																																																																
Obligation to Minimise Harm to the Environment																																																																																																
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and, if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development.	Evidence referred to elsewhere in this Audit Table	Feasible and reasonable measures were observed to be implemented for the construction at the time of the audit, noting however the non-compliances and observations referred to in this audit table.	Compliant																																																																																												
Terms of Consent																																																																																																
A2	<p>The development may only be carried out:</p> <ul style="list-style-type: none"> a) in compliance with the conditions of this consent; b) in accordance with all written directions of the Planning Secretary; c) generally in accordance with the EIS and Response to Submissions; d) in accordance with the approved plans in the table below: <table border="1"> <thead> <tr> <th colspan="4">Architectural Drawings prepared by Richard Crookes Construction</th> </tr> <tr> <th>Dwg No.</th> <th>Rev</th> <th>Name of Plan</th> <th>Date</th> </tr> </thead> <tbody> <tr><td>A-X-0111</td><td>5</td><td>Site Plan - Existing & Demolition - Ground</td><td>20/08/2021</td></tr> <tr><td>A-X-0112</td><td>5</td><td>Site Plan - Existing & Demolition - Level 1</td><td>20/08/2021</td></tr> <tr><td>A-X-0113</td><td>5</td><td>Site Plan - Existing & Demolition - Roof</td><td>20/08/2021</td></tr> <tr><td>A-X-0114</td><td>5</td><td>Site Plan - Proposed - Ground</td><td>20/08/2021</td></tr> <tr><td>A-X-0115</td><td>5</td><td>Site Plan - Proposed - Level 1</td><td>20/08/2021</td></tr> <tr><td>A-X-0116</td><td>5</td><td>Site Plan - Proposed - Roof</td><td>20/08/2021</td></tr> <tr><td>A-A-0201</td><td>2</td><td>Building A - Administration - Existing & Demolition - Ground</td><td>21/05/2021</td></tr> <tr><td>A-A-0202</td><td>2</td><td>Building A - Administration - Proposed - Ground</td><td>21/05/2021</td></tr> <tr><td>A-A-0203</td><td>2</td><td>Building A - Administration - Proposed - Roof</td><td>21/05/2021</td></tr> <tr><td>A-A-0501</td><td>2</td><td>Building A - Administration - Elevations</td><td>23/04/2021</td></tr> <tr><td>A-A-0601</td><td>2</td><td>Building A - Administration - Sections - Sheet 01</td><td>23/04/2021</td></tr> <tr><td>A-A-0602</td><td>2</td><td>Building A - Administration - Sections - Sheet 02</td><td>23/04/2021</td></tr> <tr><td>A-C-0201</td><td>3</td><td>Building C - East - Existing & Demolition - Ground</td><td>08/07/2021</td></tr> <tr><td>A-C-0202</td><td>3</td><td>Building C - Middle - Existing & Demolition - Ground</td><td>08/07/2021</td></tr> <tr><td>A-C-0203</td><td>3</td><td>Building C - West - Existing & Demolition - Ground</td><td>08/07/2021</td></tr> <tr><td>A-C-0204</td><td>3</td><td>Building C - East - Existing & Demolition - Level 1</td><td>08/07/2021</td></tr> <tr><td>A-C-0205</td><td>3</td><td>Building C - Middle - Existing & Demolition - Level 1</td><td>08/07/2021</td></tr> <tr><td>A-C-0206</td><td>3</td><td>Building C - West - Existing & Demolition - Level 1</td><td>08/07/2021</td></tr> <tr><td>A-C-0207</td><td>3</td><td>Building C - East - Proposed - Ground</td><td>08/07/2021</td></tr> <tr><td>A-C-0208</td><td>3</td><td>Building C - Middle - Proposed - Ground</td><td>08/07/2021</td></tr> <tr><td>A-C-0209</td><td>4</td><td>Building C - West - Proposed - Ground</td><td>27/07/2021</td></tr> </tbody> </table>	Architectural Drawings prepared by Richard Crookes Construction				Dwg No.	Rev	Name of Plan	Date	A-X-0111	5	Site Plan - Existing & Demolition - Ground	20/08/2021	A-X-0112	5	Site Plan - Existing & Demolition - Level 1	20/08/2021	A-X-0113	5	Site Plan - Existing & Demolition - Roof	20/08/2021	A-X-0114	5	Site Plan - Proposed - Ground	20/08/2021	A-X-0115	5	Site Plan - Proposed - Level 1	20/08/2021	A-X-0116	5	Site Plan - Proposed - Roof	20/08/2021	A-A-0201	2	Building A - Administration - Existing & Demolition - Ground	21/05/2021	A-A-0202	2	Building A - Administration - Proposed - Ground	21/05/2021	A-A-0203	2	Building A - Administration - Proposed - Roof	21/05/2021	A-A-0501	2	Building A - Administration - Elevations	23/04/2021	A-A-0601	2	Building A - Administration - Sections - Sheet 01	23/04/2021	A-A-0602	2	Building A - Administration - Sections - Sheet 02	23/04/2021	A-C-0201	3	Building C - East - Existing & Demolition - Ground	08/07/2021	A-C-0202	3	Building C - Middle - Existing & Demolition - Ground	08/07/2021	A-C-0203	3	Building C - West - Existing & Demolition - Ground	08/07/2021	A-C-0204	3	Building C - East - Existing & Demolition - Level 1	08/07/2021	A-C-0205	3	Building C - Middle - Existing & Demolition - Level 1	08/07/2021	A-C-0206	3	Building C - West - Existing & Demolition - Level 1	08/07/2021	A-C-0207	3	Building C - East - Proposed - Ground	08/07/2021	A-C-0208	3	Building C - Middle - Proposed - Ground	08/07/2021	A-C-0209	4	Building C - West - Proposed - Ground	27/07/2021	<p>Evidence referred to elsewhere in this audit table</p> <p>Interview with auditees, 07/03/2022</p> <p>Development Consent, SSD-8744305, 03/11/2021</p> <p>Letter from DPE to SINSW, SSD-8744305-PA-7, dated 17/02/2022</p> <p>Kingscliff High School, Environmental Impact Statement for State Significant Development (SSD-8744305), SJB Planning to SINSW, 19/05/2021 (EIS)</p> <p>Response to Submissions Report, Kingscliff High School, Redevelopment (SSD-8744305), SJB Planning to SINSW, 02/09/2021 (RtS)</p> <p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p>	<p>Whilst some non-compliances were identified, these were not substantial in nature and were not significant in number. Other than these few events, compliance is being achieved in all other respects and, on this basis, the Auditor does not consider it appropriate to assign a non-compliance with this condition.</p> <p>There has been one written direction from the Planning Secretary regarding the CTPMSP, as discussed under A3.</p> <p>Development was observed to be carried out generally in accordance with the EIS, RtS and additional information provided in support of the application.</p> <p>The Certifier has verified that the works to date are consistent with the approved design.</p>	Compliant
Architectural Drawings prepared by Richard Crookes Construction																																																																																																
Dwg No.	Rev	Name of Plan	Date																																																																																													
A-X-0111	5	Site Plan - Existing & Demolition - Ground	20/08/2021																																																																																													
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Unique ID	Compliance requirement				Evidence collected	Independent Audit findings and recommendations	Compliance Status	
	A-C-0210	3	Building C - East - Proposed - Level 1	08/07/2021				
	A-C-0211	3	Building C - Middle - Proposed - Level 1	08/07/2021				
	A-C-0212	3	Building C - West - Proposed - Level 1	08/07/2021				
	A-C-0213	3	Building C - East & West - Proposed - Roof	08/07/2021				
	A-C-0501	2	Building C - East - Elevations	08/07/2021				
	A-C-0502	2	Building C - Middle - Elevations	08/07/2021				
	A-C-0601	2	Building C - East - Sections	08/07/2021				
	A-C-0602	2	Building C - Middle - Sections	08/07/2021				
	A-C-0603	2	Building C - West - Section - Sheet 01	08/07/2021				
	A-C-0604	2	Building C - West - Section - Sheet 02	08/07/2021				
	A-G-0201	E	Building G - Food & Textile Technology - Existing & Demolition - Ground	01/06/2021				
	A-G-0202	E	Building G - Food & Textile Technology - Proposed - Ground	01/06/2021				
	A-G-0203	D	Building G - Food & Textile Technology - Proposed - Roof	01/06/2021				
	A-G-0501	C	Building G - Food & Textile Technology - Elevations	18/02/2021				
	A-G-0601	C	Building G - Food & Textile Technology - Sections	18/02/2021				
	A-H-0201	2	Building H - Cola - Existing & Demolition - Ground	09/07/2021				
	A-H-0202	2	Building H - Cola - Proposed - Ground	09/07/2021				
	A-H-0203	2	Building H - Cola - Proposed - Roof	09/07/2021				
	A-H-0501	2	Building H - Hall & Cola - Elevations	09/07/2021				
	A-H-0601	2	Building H - Hall & Cola - Sections	09/07/2021				
	A-O-0201	H	Building O - Existing & Demolition - Ground	08/06/2021				
	A-O-0202	I	Building O - Proposed - Ground	08/06/2021				
	A-O-0203	I	Building O - Proposed - Level 1	08/06/2021				
	A-O-0204	H	Building O - Proposed - Roof	08/06/2021				
	A-O-0501	H	Building O - Elevations - Sheet 1	08/06/2021				
	A-O-0502	H	Building O - Elevations - Sheet 2	08/06/2021				
Landscape Plans prepared by Black Beetle								
	Dwg No.	Rev	Name of Plan	Date				
	KHS LA CD 001	02	Cover Sheet	07/06/2021				
	KHS LA CD 101	02	General Arrangement Plan - Entry & Blg A	07/06/2021				
	KHS LA CD 102	02	General Arrangement Plan - Blg O	07/06/2021				
	KHS LA CD 103	02	General Arrangement Plan - Blg C	07/06/2021				
	KHS LA CD 104	02	General Arrangement Plan - Blg D & F	07/06/2021				
	KHS LA CD 301	02	Planting Plan - Entry & Blg A	07/06/2021				
	KHS LA CD 302	02	Planting Plan - Blg O	07/06/2021				
	KHS LA CD 303	02	Planting Plan - Blg C	07/06/2021				
	KHS LA CD 304	02	Planting Plan - Blg D & F	07/06/2021				
	KHS LA CD 305	01	Detail Planting Plans - Entry & Blg A	07/06/2021				
	KHS LA CD 306	01	Detail Planting Plan - Blg O	07/06/2021				

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status																																																
	<table border="1"> <tr><td>KHS LA CD 307</td><td>01</td><td>Detail Planting Plans - Carpark</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 308</td><td>01</td><td>Detail Planting Plans - Blg C</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 309</td><td>01</td><td>Detail Planting Plans - Blg D & F</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 401</td><td>02</td><td>Sections and Details 01</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 402</td><td>02</td><td>Sections and Details 02</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 403</td><td>02</td><td>Sections and Details 03</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 404</td><td>02</td><td>Sections and Details 04</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 405</td><td>02</td><td>Sections and Details 05</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 501</td><td>02</td><td>Irrigation Extent Plan - Entry & Blg A</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 502</td><td>02</td><td>Irrigation Extent Plan - Blg O</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 503</td><td>02</td><td>Irrigation Extent Plan - Blg C</td><td>07/06/2021</td></tr> <tr><td>KHS LA CD 504</td><td>02</td><td>Irrigation Extent Plan - Blg D & F</td><td>07/06/2021</td></tr> </table>	KHS LA CD 307	01	Detail Planting Plans - Carpark	07/06/2021	KHS LA CD 308	01	Detail Planting Plans - Blg C	07/06/2021	KHS LA CD 309	01	Detail Planting Plans - Blg D & F	07/06/2021	KHS LA CD 401	02	Sections and Details 01	07/06/2021	KHS LA CD 402	02	Sections and Details 02	07/06/2021	KHS LA CD 403	02	Sections and Details 03	07/06/2021	KHS LA CD 404	02	Sections and Details 04	07/06/2021	KHS LA CD 405	02	Sections and Details 05	07/06/2021	KHS LA CD 501	02	Irrigation Extent Plan - Entry & Blg A	07/06/2021	KHS LA CD 502	02	Irrigation Extent Plan - Blg O	07/06/2021	KHS LA CD 503	02	Irrigation Extent Plan - Blg C	07/06/2021	KHS LA CD 504	02	Irrigation Extent Plan - Blg D & F	07/06/2021			
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A3	<p>Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:</p> <ol style="list-style-type: none"> 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 that are required to be, and have been, approved by the Planning Secretary; any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and the implementation of any actions or measures contained in any such document referred to in (a) above. 	<p>Interview with auditees, 07/03/2022</p> <p>Letter from DPE to SINSW, SSD-8744305-PA-7, dated 17/02/2022</p> <p>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 9, 01/03/2022</p> <p>Email from SINSW confirming submission of CTPMSP to DPE, 07/03/2022</p> <p>Letter from DPE to SINSW, SSD-8744305-PA-7, dated 11/03/2022</p>	<p>A written direction was issued by the Department to SINSW in relation to submission of a revision to the Project's Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP). The direction requested a response by provided by 10/03/2022.</p> <p>The CTPMSP was subsequently updated to address comments raised by the Department and reissued. The revised CTPMSP has been accepted by the Department.</p>	Compliant																																																
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict	-	Noted. This audit assesses compliance with the current conditions. No conflicts identified.	Not triggered																																																
Limit of Consent																																																				
A5	This consent lapses five years after the date of consent unless work is physically commenced.	<p>Letter INSW to DPE, DOC21/1323432, 14/12/2021</p> <p>Site inspection, 14/03/2022</p>	Works commenced on 20/12/2021, as notified by INSW to DPE.	Compliant																																																
Prescribed Conditions																																																				
A6	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	<p>Part 6, Division 8A of the EPAA</p> <p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>Part 6, Division 8A of the EP&A relates to prescribed conditions for:</p> <ul style="list-style-type: none"> Compliance with the BCA (Stage 1 Crown Certificate received) Erection of signs (construction signage sighted – refer to C1) Residential building work (not relevant) Entertainment venues (not relevant) Signage for max number of persons in venues (not relevant for construction) Shoring and adjoining properties (no properties are adjoining to the Project). 	Compliant																																																

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Planning Secretary as Moderator				
A7	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.	Interview with auditees, 07/03/2022	The auditees advised that there have been no disputes with any public authorities in relation to an applicable requirement in the approval (SSD-9744305) or relevant matter relating to the Development.	Not triggered
Evidence of Consultation				
A8	Where conditions of this consent require consultation with an identified party, the Applicant must: <ul style="list-style-type: none"> a) consult with the relevant party prior to submitting the subject document for information or approval; and b) provide details of the consultation undertaken including: <ul style="list-style-type: none"> i. the outcome of that consultation, matters resolved and unresolved; and ii. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved. 	Refer to evidence sighted in relation to B5, B16 B17, B19, C27, and C28	Where required by the specific condition, consultation has been carried out prior to submission of the relevant documents for information or approval.	Compliant
Staging				
A9	The project may be constructed and operated in stages. Where compliance with conditions is required to be staged due to staged construction or operation, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the satisfaction of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).	Interview with auditees, 07/03/2022	A staged approach to construction has not been proposed, therefore no Staging Report has been prepared. A staged approach to operations is planned, with the project in the process of preparing a Staging Report to address staged compliance with Part D and Part E conditions. Target date for commencement of operations is August 2022.	Not triggered
A10	A Staging Report prepared in accordance with condition A9 must: <ul style="list-style-type: none"> a) if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; b) if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant); c) specify how compliance with conditions will be achieved across and between each of the stages of the project; and d) set out mechanisms for managing any cumulative impacts arising from the proposed staging. 	Refer to A9.	Refer to A9.	Not triggered
A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	Refer to A9.	Refer to A9.	Not triggered
A12	Where construction or operation is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report.	Refer to A9.	Refer to A9.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Staging, Combining and Updating Strategies, Plans or Programs				
A13	<p>The Applicant may:</p> <ol style="list-style-type: none"> prepare and submit any strategy, plan (including management plan, architectural or design plan) or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan (including management plan, architectural or design plan) or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan (including management plan, architectural or design plan) or program); combine any strategy, plan (including management plan, architectural or design plan), or program required by this consent (if a clear relationship is demonstrated between the strategies, plans (including management plan, architectural or design plan) or programs that are proposed to be combined); and update any strategy, plan (including management plan, architectural or design plan), or program required by this consent (to ensure the strategies, plans (including management plan, architectural or design plan), or programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development) 	<p>Interview with auditees, 07/03/2022</p> <p>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 7, 27/01/2022</p> <p>Letter from SINSW to DPE, DOC21/1311221, dated 10/02/2022</p> <p>DPE lodgement record, SSD-8744305-PA-7, 09/02/2022</p>	<p>In line with A13 (c), an update was made to the Project's Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) during the audit period, following receipt of comments from Transport for NSW.</p> <p>To date, the Project has not proposed the staged preparation and submission of a strategy, plan, or program required by this consent. Similarly, the Project has not proposed to combine any strategy, plan, or program required by this consent.</p>	Compliant
A14	Any strategy, plan or program prepared in accordance with condition A13, where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary.	<p>Letter from DPE to SINSW, SSD-8744305-PA-7, dated 17/02/2022</p> <p>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 9, 01/03/2022</p> <p>Email from SINSW confirming submission of CTPMSP to DPE, 07/03/2022</p> <p>Letter from DPE to SINSW, SSD-8744305-PA-7, dated 11/03/2022</p>	<p>The updated CTPMSP was submitted to the Department as per the evidence referenced in A13, above. The Department responded in writing to the update CTPMSP, requesting provision of additional information.</p> <p>The CTPMSP was subsequently updated to address comments raised by the Department and reissued. The revised CTPMSP has been accepted by the Department. See A3, above.</p>	Compliant
A15	If the Planning Secretary agrees, a strategy, plan (including management plan, architectural or design plan), or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	Interview with auditees, 07/03/2022	No agreements have been made with the Planning Secretary to update a strategy, plan, or program in a staged manner or without consulting with required parties.	Not triggered
A16	Updated strategies, plans (including management plan, architectural or design plan), or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan, program or drawing	<p>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 9, 01/03/2022</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p> <p>Project website link: https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/k/kingscliff-high-school/dec-2021/B15d_B16_-_KHS_Construction_Traffic_Pedestrian_Management_Sub_Plan_-_JAN_2022.pdf </p>	<p>The updated CTPMSP is being implemented in accordance with B16.</p> <p>The latest version of the CTPMSP (Revision 9, dated 01/03/2022) has not been uploaded to the Project website, with Revision 6 (dated 04/01/2022) currently available. This has been raised as a non-compliance against A27 (see below).</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Structural Adequacy				
A17	All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. <i>Note: Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.</i>	Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021 Design Certificate – COLA Structure (SSDA), ACOR Consultants, 10/12/2021 Site inspection, 14/03/2022	Stage 1 Crown Certificate (CRO-21085) issued on 15/12/2021 for following scope: “Covered Outdoor Learning Area (COLA) associated with the existing hall only and to the exclusion of the upgrades to Kingscliff High School, including construction of a new Performing Arts building, alterations to existing buildings, carparking and local infrastructure.” Crown Certificate references Design Certificate for COLA Structure, prepared by ACOR Consultants. Sighted COLA structure installed onsite during inspection.	Compliant
External Walls and Cladding				
A18	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA	Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021 Installation Statement – External Walls & Finishes, from Richard Crookes Construction to the Certifier (BM+G), dated 06/12/2021	The Certifier has verified that the design meets the requirements of the BCA. Stage 1 Crown Certificate (CRO-21085) references Installation Statement for external walls and finishes, prepared by Richard Crookes Construction.	Compliant
External Materials				
A19	The external colours, materials and finishes of the buildings must be consistent with the approved plans referenced in Condition A2. Any minor changes to the colour and finish of approved external materials may be approved by the Certifier provided: a) the alternative colour/material is of a similar tone/shade and finish to the approved external colours/building materials; b) the quality and durability of any alternative material is the same standard as the approved external building materials; and c) a copy of any approved changes to the external colours and/or building materials is provided to the Planning Secretary for information.	Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021 Installation Statement – External Walls & Finishes, from Richard Crookes Construction to the Certifier (BM+G), dated 06/12/2021	Stage 1 Crown Certificate (CRO-21085) references Installation Statement for external walls and finishes, prepared by Richard Crookes Construction. The auditees stated that no variations have been made to the external colours, materials and finishes of the buildings noted in the approved plans referenced in Condition A2.	Compliant
Design and Construction for Bush Fire				
A20	The development must be undertaken in accordance with the recommendations of the Bushfire Assessment Report prepared by Cool Burn Fire and Ecology dated 21 July 2021.	Bushfire Assessment Report SSD-8744305, Cool Burn Fire and Ecology, v1.2, 21/07/2021 Drawing – Hydraulic Services Proposed Site Plan, ACOR Consultants, KHS-H10.01, 06/09/2021 Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Recommendations relating to water are addressed in the Hydraulic Services drawing provided, including provision of a new 72,000 litre water storage tank, new hydrants, booster valve and pumping infrastructure, and acknowledgement of requirement to comply with AS2419-2005. The auditees advised that recommendations related to new proposed buildings will be addressed in the next Crown Certificate submission to the Certifier (CC2). The auditees also advised that the landscape design is still in development and that a Vegetation Management Plan will be prepared at a later stage that will address the recommendations relating to APZ and landscaping.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Design and construction for Flood risk				
A21	The development must be undertaken in accordance with the recommendations of the Flooding Assessment Phase 2 prepared by GHD dated April 2021 and in accordance with the letter prepared by GHD dated 13 August 2021.	SINSW01427-20 - Kingscliff High School Flooding Assessment Phase 2, GHD, April 2021 Letter GHD to MBB Group, 13/08/2021 Flood Emergency Response Sub-Plan – Kingscliff High School, Molino Stewart, Rev 2.0, 02/12/2021 Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Refer to evidence cited, as well as A22, below.	Compliant
A22	Building O must have a minimum finished floor level of 5.85 AHD.	Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021 Design Statement letter from Bickerton Masters, dated 06/12/2021: Drawing KHS-A-0-0202	The auditees advised that the majority of the building is above 5.85 AHD; however, the area '0.GF.17 BOYS CHANGE ROOM' is below 5.85 AHD requirement. The Certifier has been advised of this and the design has been accepted as part of the Crown Certificate for Stage 1.	Compliant
A23	The extension to Building A must be constructed with flood compatible materials and fittings below the estimated 100-year flood level of 7.44m AHD.	Drawings, Building A – Administration – Wall Sections, KHS-A-A-0701 (Rev 3); KHS-A-A-0702 (Rev 2); KHS-A-A-0703 (Rev 2) Structural Design Certification letter – Building A Admin, Building G, Building O, Building H and COLA structure, pump house structure and Building C refurbishment work (excluding library building), ACOR Consultants, BR210028, dated 22/11/2021	The Building A drawings provided show ground level is at 7.010m AHD. The Structural Design Certification letter provided by ACOR Consultants confirms the following: "Building A Admin has been designed to the requirements of SSD-8744305 item A23 and the ABCB Construction of Buildings in Flood Hazard Areas relating to the clause C2.8, confirming that the structural materials within the 1 in 100 year flood level event of Building A Admin are suitable materials as designated in Appendix C of this guide."	Compliant
Applicability of Guidelines				
A24	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	CEMP and sub-plans (B15, B16, B17, B18, B19, B20, B21) Interview with auditees, 07/03/2022	Noted. The project plans appear to reference the current versions of guidelines, protocols, Standards or policies.	Compliant
A25	Consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Interview with auditees, 07/03/2022	One written direction has been issued by the Planning Secretary (refer to A3), which did not require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Monitoring and Environmental Audits				
A26	<p>Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, noncompliance notification, Site audit report and independent auditing.</p> <p><i>Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i></p>	Interview with auditees, 07/03/2022	<p>The relevant section of the EP& A Act relates to (among other things) the need to be accurate, true (not misleading), properly conducted (approved methodology, calibrated etc.) and with records retained.</p> <p>No incidents or non-compliances were identified and reported during the audit period.</p> <p>This Audit has been conducted in accordance with ISO19011 and the Department's Independent Audit Post Approval Requirements.</p>	Compliant
Access to Information				
A27	<p>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:</p> <p>c) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <ul style="list-style-type: none"> xi. the documents referred to in condition A2 of this consent; xii. all current statutory approvals for the development; xiii. all approved strategies, plans and programs required under the conditions of this consent; xiv. 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; xv. 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; xvi. a summary of the current stage and progress of the development; xvii. contact details to enquire about the development or to make a complaint; xviii. a complaints register, updated monthly; xix. audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report; xx. any other matter required by the Planning Secretary; and <p>d) keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.</p>	<p>SINSW Project website: https://www.schoolinfrastructure.nsw.gov.au/projects/k/kingscliff-high-school-upgrade.html#category-reports</p> <p>DPE Planning Portal website: https://www.planningportal.nsw.gov.au/major-projects/projects/upgrades-kingscliff-high-school</p> <p>SINSSW Project website link – CTPMSP: https://www.schoolinfrastructure.nsw.gov.au/content/dam/infrastructure/projects/k/kingscliff-high-school/dec-2021/B15d_B16_-_KHS_Construction_Traffic_Pedestrian_Management_Sub_Plan_-_JAN_2022.pdf</p>	<p>Relevant documents required under A27 are available on the SINSW Project website, as follows:</p> <ul style="list-style-type: none"> i. and ii. – Link included to the NSW Planning Portal page for the Project iii. – Access provided to approved strategies, plans and programs required under the conditions of this consent. Noted that updated version of CTPMSP has noted been uploaded to the website. iv. Not triggered – no environmental reporting has been required to be conducted to date. v. Not triggered – no monitoring has been required to be conducted to date. vi. Last Project Update and Works Notification is for Dec 2021. The works notified in this update are still being undertaken, therefore no additional updates have been required to be uploaded. vii. The website includes an enquiry form under 'Get involved' link. The project phone number (1300 482 651) is available in the works notifications and in the Community Communication Strategy. viii. – Complaints update for January and February 2022 available on website (no complaints reported). ix. – Not triggered – this is the first Independent Audit x. – Not triggered <p>Observation: The latest version of the CTPMSP (Revision 7, 27/01/2022) has not been uploaded to the Project website. Whilst the CEMP and Sub-Plans are not required to be approved (and subsequently uploaded to the Project website under A27(a)(iii)), previous versions of the plans have been uploaded to the website, therefore it is recommended that the revised CTPMSP be uploaded to the website for consistency.</p>	Compliant
Compliance				
A28	The Applicant must ensure that all of its 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>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p> <p>Workers Inducted Report, 01/06/2021 to 07/03/2022 (267 workers inducted for both Kingscliff High School and Kingscliff Public School projects)</p>	The Site Induction includes requirements detailed in the conditions of this consent. Evidence provided of key Project personnel being made aware of their responsibilities in relation to compliance the conditions of this consent.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p>Aconex correspondence to MMB Group and SINSW, RCC-TRANSMIT-000401, 08/11/2021</p> <p>Aconex correspondence to Richard Crookes Constructions (internal), RCC-TRANSMIT-000399, 08/11/2021</p> <p>Aconex correspondence to subcontractors, RCC-TRANSMIT-000400, 08/11/2021</p>		
Incident Notification, Reporting and Response				
A29	The Planning Secretary must be notified through the major projects portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.	Interview with auditees, 07/03/2022	The auditees advised that no incidents have been reported on the Project during the audit period.	Not triggered
A30	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.	Refer to A29.	Refer to A29.	Not triggered
Non-Compliance Notification				
A31	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	Interview with auditees, 07/03/2022	The auditees advised that no non-conformances have been identified for the Project during the audit period.	Not triggered
A32	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.	Refer to A31.	Refer to A31.	Not triggered
A33	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Refer to A31.	Refer to A31.	Not triggered
Revision of Strategies, Plans and Programs				
A34	<p>Within three months of:</p> <ul style="list-style-type: none"> a) the submission of a compliance report under condition A37; b) the submission of an incident report under condition A30; c) the submission of an Independent Audit under condition C37 or C38; d) the approval of any modification of the conditions of this consent; or e) the issue of a direction of the Planning Secretary under condition A2 which requires a review, <p>the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.</p>	<p>Interview with auditees, 07/03/2022</p> <p>Letter from DPE to SINSW, SSD-8744305-PA-7, dated 17/02/2022</p> <p>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 9, 01/03/2022</p> <p>Email from SINSW confirming submission of CTPMSP to DPE, 07/03/2022</p> <p>Letter from DPE to SINSW, SSD-8744305-PA-7, dated 11/03/2022</p>	<p>The auditees advised that no compliance reports (A37) or incident reports (A30) were submitted during the audit period.</p> <p>This is the first Independent Audit to be conducted for the Project (C37, C38).</p> <p>There has been one written direction from the Planning Secretary regarding the CTPMSP, as discussed under A3. The direction requested a response by provided by 10/03/2022. The CTPMSP was subsequently updated to address comments raised by the Department and reissued. The revised CTPMSP has been accepted by the Department.</p>	Compliant
A35	<p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) within six weeks of the review.</p> <p><i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i></p>	<p>Interview with auditees, 07/03/2022</p> <p>Letter from DPE to SINSW, SSD-8744305-PA-7, dated 17/02/2022</p> <p>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 9, 01/03/2022</p>	<p>As discussed under A3, A13, and A14, a written direction was issued by the Department to SINSW in relation to submission of a revision to the Project's Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP). The direction included a request for provision of additional information/clarification in response to a number of comments raised by the Department.</p> <p>The CTPMSP was subsequently updated to address the comments raised and reissued on 07/03/2022 (which is within 6</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p>Email from SINSW confirming submission of CTPMSP to DPE, 07/03/2022</p> <p>Letter from DPE to SINSW, SSD-8744305-PA-7, dated 11/03/2022</p> <p>Aconex correspondence from RCC to Certifier (BM+G), RCC-GCOR-002146, 07/03/2022</p>	<p>weeks of the review). The revised CTPMSP has been accepted by the Department.</p> <p>The revised CTPMSP was provided to the Certifier on 07/03/2022 (which is within 6 weeks of the review).</p>	
Compliance Reporting				
A36	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements.	<p>Compliance Reporting Post Approval Requirements (2020)</p> <p>Letter INSW to DPE, DOC21/1323432, 14/12/2021</p> <p>Site inspection, 14/03/2022</p>	Compliance reporting is not triggered until the operational phase of the Project, in line with the CRPAR (2020). The Project is currently in the construction phase.	Not triggered
A37	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements, unless otherwise agreed by the Planning Secretary.	Refer to A36.	Refer to A36.	Not triggered
A38	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary.	Refer to A36.	Refer to A36.	Not triggered
A39	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements, the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.	Refer to A36.	Refer to A36.	Not triggered
PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION				
Notification of Commencement				
B1	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates.	Letter INSW to DPE, DOC21/1323432, 14/12/2021	Works commenced on 20/12/2021, as notified by INSW to DPE.	Compliant
B2	If the construction or operation of the development is to be staged, the Planning Secretary must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	Interview with auditees, 07/03/2022	As noted for A9, above, staging is proposed for the operations phase of the Project, but not for construction. Operations is not due to commence until August 2022, therefore notification under B2 is not yet triggered.	Not triggered
Certified Drawings				
B3	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent.	<p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Interview with auditees, 07/03/2022</p> <p>Structural Design Certification letter – Building A Admin, Building G, Building O, Building H and COLA structure, pump house structure and Building C refurbishment work (excluding library building), ACOR Consultants, BR210028, dated 22/11/2021</p> <p>Structural Design Certification letter – Building O (CAPA), ACOR Consultants, BR210028, 10/03/2022</p>	Structural design certification has been issued by ACOR Consultants and referenced in Crown Certificate 1.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
External Walls and Cladding				
B4	Prior to the commencement of construction, the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the BCA. The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	<p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Installation Statement – External Walls & Finishes, from Richard Crookes Construction to the Certifier (BM+G), dated 06/12/2021</p> <p>Aconex correspondence from Certifier (BM+G) to MBB Group, BM+G-GCOR-000066, 20/12/2021</p> <p>Letter from SINSW to DPE, DOC21/1342370, dated 20/12/2021</p> <p>DPE lodgement record, SSD-8744305-PA-6, dated 21/12/2021</p>	<p>Stage 1 Crown Certificate (CRO-21085) references Installation Statement for external walls and finishes, prepared by Richard Crookes Construction.</p> <p>Certifier acceptance received on 20/12/2021, noting that the external walls and cladding materials provided satisfy the requirements of B4.</p>	Compliant
Pre-Construction Dilapidation Report – Protection of Public Infrastructure				
B5	<p>Prior to the commencement of construction, the Applicant must:</p> <ol style="list-style-type: none"> consult with the relevant owner and provider of services and Infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; prepare a Pre-Construction Dilapidation Report identifying the condition of all public (nonresidential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected; submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested. 	<p>Pre-construction Dilapidation Report: Public Infrastructure to Kingscliff High School – Oxford Street, RCC, KHS.01, dated 06/12/2021</p> <p>Email from RCC to Tweed Shire Council, dated 06/12/2021</p> <p>Aconex correspondence from RCC to Certifier (BM+G), RCC-GCOR-002380, 10/12/2021</p>	<p>A public infrastructure dilapidation report has been prepared and evidence of consultation with Tweed Shire Council and Endeavour Energy provided. The report has been provided to the Certifier and Council (who is the asset owner).</p> <p>The auditees advised that the Planning Secretary has not requested a copy of the Pre-Construction Dilapidation Reports.</p>	Compliant
B6	Prior to the commencement of construction, details from a structural engineer are to be submitted to the Certifier for all retaining walls, footings or structures within the zone of influence of the sewer main or other underground infrastructure, including a certificate of sufficiency of design.	<p>Structural Design Certification letter – Building A Admin, Building G, Building O, Building H and COLA structure, pump house structure and Building C refurbishment work (excluding library building), ACOR Consultants, BR210028, dated 22/11/2021</p> <p>Structural Design Certification letter – Building O (CAPA), ACOR Consultants, BR210028, 10/03/2022</p> <p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p>	Structural design certification has been issued by ACOR Consultants and referenced in Crown Certificate 1, issued prior to commencement of construction.	Compliant
Pre-Construction Survey – residential Properties				
B7	Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of residential buildings that are likely to be impacted by the development.	<p>Letter from ACOR Consultants to Richard Crookes Construction re: Requirement for Building Condition Report on Adjacent Neighbour Structures, dated 26/10/2021</p> <p>Letters of offer for pre-construction property inspection from SINSW to neighbouring residents (5 properties), dated 02/12/2021</p>	<p>Letter from structural engineer, ACOR Consultants, concludes that the nine residential properties adjacent to the Project site would not require a record of building condition, given the distance of the Project works from the properties and the type of footings that have been specified.</p> <p>Despite this, letters offering pre-construction property inspection were sent to the five closest neighbouring residential properties on the northern boundary of the Project site. Three properties accepted the offer for a pre-construction survey, which have been completed.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p>Pre-construction Survey Report – 8 Cambridge Court, Kingscliff, Childs Property Inspections, 2312035D, 13/12/2021</p> <p>Pre-construction Survey Report – 6 Cambridge Court, Kingscliff, Childs Property Inspections, 2312036D, 13/12/2021</p> <p>Pre-construction Survey Report – 2 Cambridge Court, Kingscliff, Childs Property Inspections, 2312051Ds, 13/12/2021</p>		
B8	Where the offer for a pre-construction survey is accepted (as required by condition B7), the Applicant must arrange for a survey to be undertaken by a suitably qualified and experienced expert prior to the commencement of vibration generating works that could impact on the identified buildings.	<p>Pre-construction Survey Report – 8 Cambridge Court, Kingscliff, Childs Property Inspections, 2312035D, 13/12/2021</p> <p>Pre-construction Survey Report – 6 Cambridge Court, Kingscliff, Childs Property Inspections, 2312036D, 13/12/2021</p> <p>Pre-construction Survey Report – 2 Cambridge Court, Kingscliff, Childs Property Inspections, 2312051Ds, 13/12/2021</p>	<p>Three properties accepted the offer for a pre-construction survey, which were conducted by Childs Property Inspections and documented in the referenced reports. The survey inspections were completed prior to the commencement of construction.</p> <p>The pre-construction survey reports note the following details:</p> <p><i>This inspection was carried out by Gavin Childs</i></p> <p><i>Accreditation Number 02362</i></p> <p><i>Building Consultant Licence BC 916</i></p> <p><i>Childs Property Inspections Building Consultant Company Licence BC 981</i></p>	Compliant
B9	<p>Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by condition B8, the Applicant must:</p> <ol style="list-style-type: none"> provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report; submit a copy of the Pre-Construction Survey Report to the Certifier; and provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested 	<p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>The Project has not yet commenced vibration generating works that could impact on the buildings surveyed.</p> <p>The auditee advised that the Pre-Construction Survey Reports being provided to the owner of each of the residential buildings surveyed via letterbox drop.</p> <p>The auditees also advised that the Planning Secretary has not requested a copy of the Pre-Construction Survey Reports.</p> <p>The Pre-Construction Survey Reports must be provided to the Certifier prior to commencement of vibration generating works that could impact on the buildings surveyed.</p>	Not triggered
Community Communication Strategy				
B10	<p>No later than 48 hours before the commencement of construction, a Community Communication Strategy must be submitted to the Planning Secretary for information. The Community Communication Strategy must provide mechanisms to facilitate communication between the Applicant, the relevant Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction.</p> <p>The Community Communication Strategy must:</p> <ol style="list-style-type: none"> identify people to be consulted during the design and construction phases; set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; set out procedures and mechanisms: <ol style="list-style-type: none"> through which the community can discuss or provide feedback to the Applicant; through which the Applicant will respond to enquiries or feedback from the community; and 	<p>Community Communication Strategy – Kingscliff High School, SINSW, December 2021</p> <p>DPE lodgement record, SSD-8744305-PA-5, 16/12/2021</p>	<p>The Community Communication Strategy was submitted to the Planning Secretary greater than 48 hours before commencement of construction.</p> <p>Inclusion of content in line with B10 is demonstrated in Table 1 of the Community Communication Strategy.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	iii. to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation.			
Ecological Sustainable Development				
B11	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either: <ul style="list-style-type: none"> a) registering for a minimum 4-star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifier; or b) seeking approval from the Planning Secretary for an alternative certification process 	Green Star Registration record, 07/10/2021 Aconex correspondence from RCC to Certifier (BM+G), RCC-GCOR-002380, 22/11/2022	Project has registered for a Green Star Design & As Built v1.3 rating. Confirmation of registration was submitted to the Certifier on 22/11/2021 (i.e. prior to commencement of construction).	Compliant
Outdoor lighting				
B12	Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifier that all outdoor lighting to be installed 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 and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	The auditees advised that the lighting design is not yet finalised and construction has not yet commenced.	Not triggered
Demolition				
B13	Prior to the commencement of construction, demolition work plans required by AS 2601-2001 The demolition of structures (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier and Planning Secretary.	Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021 Demolition Management Plan Kingscliff High School, PF 879, Demex, Rev 3.0, 13/10/2021 Compliance Statement – Demolition, Demex, 01/12/2021 DPE lodgement record, SSD-8744305-PA-6, 21/12/2021	Non-compliance: Records show that the demolition work plans were submitted to the Department on 21/12/2021, which was one day after the commencement of construction (20/12/2021, as notified by INSW to DPE under B1).	Non-compliant
Environmental Management Plan Requirements				
B14	Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the <i>Environmental Management Plan Guideline: Guideline for Infrastructure Projects</i> (DPIE April 2020). <i>Note:</i> <ul style="list-style-type: none"> • The <i>Environmental Management Plan Guideline</i> is available on the Planning Portal at: https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval • The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans. 	Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 3, 09/12/2021	The CEMP and sub-plans have been prepared giving regard to the Guideline where specifics are required by the consent.	Compliant
Construction Environmental Management Plan				
B15	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following: <ul style="list-style-type: none"> a) Details of: <ul style="list-style-type: none"> i. hours of work; ii. 24-hour contact details of site manager; iii. management of dust and odour to protect the amenity of the neighbourhood; 	Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 3, 09/12/2021 Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021 DPE lodgement record, SSD-8744305-PA-4, 16/12/2021	The CEMP has been generally prepared in line with the requirements of B15, as referenced below. Addressed in section 1.2 of the CEMP. Addressed in section 1.3 of the CEMP. Addressed in section 2 of the CEMP.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	iv. external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;		Addressed in section 3 of the CEMP.	
	v. community consultation and complaints handling as set out in the Community Communication Strategy required by condition B10;		Addressed in section 4 of the CEMP.	
	b) an unexpected finds protocol for contamination and associated communications procedure to ensure that potentially contaminated material is appropriately managed;		Addressed in section 6 of the CEMP (and section 4.3.2 of the Aboriginal Cultural Heritage Management Plan (ACHMP)).	
	c) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;		Addressed in section 6 of the CEMP (and section 4.3.2 of the Aboriginal Cultural Heritage Management Plan (ACHMP)).	
	d) Construction Traffic and Pedestrian Management Sub-Plan (see condition B16);		Addressed in section 7 of the CEMP and the CTPMSP (see B16).	
	e) Construction Noise and Vibration Management Sub-Plan (see condition B17);		Addressed in section 8 of the CEMP and the CNVMSP (see B17).	
	f) Construction Waste Management Sub-Plan (see condition B18);		Addressed in section 9 of the CEMP and the CWMS (see B18).	
	g) Construction Soil and Water Management Sub-Plan (see condition B19);		Addressed in section 10 of the CEMP and the CSWMSP (see B19).	
	h) Biodiversity Management Sub-Plan (see condition B20); and		Addressed in section 11 of the CEMP and the BMSP (see 20).	
	i) Flood Emergency Response (see condition B21);		Addressed in section 12 of the CEMP and the FERSP (see B21).	
B16	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:	Interview with auditees, 07/03/2022 Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 7, 27/01/2022 Letter from SINSW to DPE, DOC21/1311221, dated 10/02/2022 DPE lodgement record, SSD-8744305-PA-7, 09/02/2022 Letter from DPE to SINSW, SSD-8744305-PA-7, dated 17/02/2022	As discussed under A3, A13, and A14, a written direction was issued by the Department to SINSW in relation to submission of a revision to the Project's Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP). The direction included a request for provision of additional information/clarification in response to a number of comments raised by the Department. The CTPMSP was subsequently updated to address the comments raised and reissued on 07/03/2022 (which is within 6 weeks of the review). The revised CTPMSP has been accepted by the Department. The revised CTPMSP was provided to the Certifier on 07/03/2022 (which is within 6 weeks of the review).	Compliant
	a) be prepared by a suitably qualified and experienced person(s);	Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 9, 01/03/2022	Addressed on the cover page and in Appendix K 'Certificates and competencies' in the CTPMSP.	
	b) be prepared in consultation with Council and TfNSW;		Addressed in Appendix L of the CTPMSP.	
	c) detail:	Email from SINSW confirming submission of CTPMSP to DPE, 07/03/2022	Addressed in sections 12 of the CTPMSP.	
	i. measures to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services;	Letter from DPE to SINSW, SSD-8744305-PA-7, dated 11/03/2022		
	ii. measures to ensure the safety of vehicles and pedestrians accessing adjoining properties where shared vehicle and pedestrian access occurs;	Aconex correspondence from RCC to Certifier (BM+G), RCC-GCOR-002146, 07/03/2022	Addressed in section 12.25 of the CTPMSP.	
	iii. detail heavy vehicle routes, access and parking arrangements;		Addressed in section 12.18 of the CTPMSP.	
	iv. the swept path of the longest construction vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, in accordance with the latest version of AS 2890.2; and		Addressed in Appendix B 'Traffic Guidance Schemes' of the CTPMSP.	

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	v. arrangements to ensure that construction vehicles enter and leave the site in a forward direction unless in specific exceptional circumstances under the supervision of accredited traffic controller(s);		Addressed in Appendix B 'Traffic Guidance Schemes' of the CTPMSP.	
	vi. measures to prohibit construction access through Council's land to the east of the site (Lot 66 DP858466); and		Addressed in section 12.13 of the CTPMSP.	
	vii. measures to minimise truck movements between 7:45am to 9am and 2pm to 3:45pm		Addressed in section 12.18 of the CTPMSP.	
B17	The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:	Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 09/12/2021 Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021 DPE lodgement record, SSD-8744305-PA-4, 16/12/2021	The CNVMSP has been generally prepared in accordance with B17, as referenced below.	Compliant
	a) be prepared by a suitably qualified and experienced noise expert;		Addressed in Appendix A 'Consultant Qualification' of the CNVMSP.	
	b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);		Addressed in sections 5 and 7 of the CNVMSP.	
	c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;		Addressed in section 7 of the CNVMSP.	
	d) include strategies that have been developed with the community for managing high noise generating works;		Addressed in section 7 of the CNVMSP.	
	e) describe the community consultation undertaken to develop the strategies in condition B17(d);		Addressed in section 7 of the CNVMSP.	
	f) include a complaints management system that would be implemented for the duration of the construction; and		Addressed in section 7 of the CNVMSP.	
	g) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures in accordance with the requirements of condition B14.		Addressed in section 7 of the CNVMSP.	
B18	The Construction Waste Management Sub-Plan (CWMSPP) must address, but not be limited to, the procedures for the management of waste including the following:	Construction Waste Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 2, 09/12/2021 Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021 DPE lodgement record, SSD-8744305-PA-4, 16/12/2021	The CWMSPP has been generally prepared in accordance with B18, as referenced below.	Compliant
	a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use;		Addressed in section 5 of the CWMSPP.	
	b) information regarding the recycling and disposal locations; and		Addressed in section 5.5 of the CWMSPP.	
	c) confirmation of the contamination status of the development areas of the site based on the validation results		No contaminated material identified prior to commencement of construction; unexpected finds protocol being implemented.	
B19	The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMSPP) and the plan must address, but not be limited to the following:	Construction Soil and Water Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 3, 09/12/2021 Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021 DPE lodgement record, SSD-8744305-PA-4, 16/12/2021	The CSWMSPP has been generally prepared in accordance with B19, as referenced below.	Compliant
	a) be prepared by a suitably qualified expert, in consultation with Council;		Addressed in Appendix D 'Consultant Qualification' of the CSWMP.	
	b) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;		Addressed in Appendix A 'ESCP Drawing' of the CSWMP.	
	c) describe all erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book';		Addressed in section 6.1 of the CSWMP.	

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> d) include an Acid Sulfate Soils Management Plan, if required, including measures for the management, handling, treatment and disposal of acid sulfate soils, including monitoring of water quality at acid sulfate soils treatment areas; e) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); f) detail all off-site flows from the site; and g) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 5-year ARI 		<p>Addressed in Appendix C 'Acid Sulphate Soils Management Plan Excerpt (Douglas Partners, 2021)' of the CSWMP.</p> <p>Addressed in Appendix A 'ESCP Drawing' of the CSWMP.</p> <p>Addressed in section 4-6 of the CSWMP.</p> <p>Addressed in section 6.3 and Appendix A 'ESCP Drawing' of the CSWMP.</p>	
B20	<p>The Biodiversity Management Sub-Plan (BMSB) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person/s; b) identify areas of land where impacts on biodiversity are to be avoided as outlined in the Biodiversity Development Assessment Report prepared by Kleinfelder, dated 15 April 2021 and the Bush Stone-curlew Management Plan prepared by Kleinfelder, dated 5 August 2021 and set out how these areas will be protected from construction impacts; c) set out the measures identified in the Biodiversity Development Assessment Report to minimise, mitigate and manage impacts on biodiversity, including timing and responsibility for delivery of the measures. 	<p>Biodiversity Management Sub-Plan – Kingscliff High School Upgrade, Kleinfelder, Rev 2.0, 09/12/2021</p> <p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>DPE lodgement record, SSD-8744305-PA-4, 16/12/2021</p>	<p>The BMSB has been generally prepared in accordance with B20, as referenced below.</p> <p>Addressed in Appendix A 'Kevin Wormington CV' of the BMSB.</p> <p>Addressed in section 3 of the BMSB.</p> <p>Addressed in section 3 of the BMSB.</p>	Compliant
B21	<p>The Flood Emergency Response Sub-Plan (FERSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified and experienced person(s); b) address the provisions of the Floodplain Risk Management Guidelines (EESG); c) include details of <ul style="list-style-type: none"> i. the flood emergency responses for both construction phases of the development; ii. predicted flood levels; iii. flood warning time and flood notification; iv. assembly points and evacuation routes; v. evacuation and refuge protocols; and vi. awareness training for employees and contractors, and users/visitors. 	<p>Flood Emergency Response Sub-Plan – Kingscliff High School, Molino Stewart, Rev 2.0, 02/12/2021</p> <p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>DPE lodgement record, SSD-8744305-PA-4, 16/12/2021</p>	<p>The FERSP has been generally prepared in accordance with B21, as referenced below.</p> <p>Addressed in Appendix 1 'Curriculum Vitae' of the FERSP.</p> <p>Addressed in sections 2 through 6 of the FERSP.</p> <p>-</p> <p>Addressed in section 6 of the FERSP.</p> <p>Addressed in sections 4.4, 4.5 and 5.2 of the FERSP.</p> <p>Addressed in section 5.3 and 5.4 of the FERSP.</p> <p>Addressed in sections 5 and 6 of the FERSP.</p> <p>Addressed in section 6 of the FERSP.</p> <p>Addressed in Appendix 1 Curriculum Vitae' of the FERSP.</p>	Compliant
B22	<p>A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following:</p> <ul style="list-style-type: none"> a) minimise the impacts of earthworks and construction on the local and regional road network; b) minimise conflicts with other road users; c) minimise road traffic noise; and d) ensure truck drivers use specified routes. 	<p>Kingscliff High School Driver Code of Conduct, Richard Crookes Construction</p> <p>Delivery driver induction checklist and sign off – hard copies kept onsite (photos provided by RCC)</p>	<p>A Drive Code of Conduct has been prepared for the Project in line with B22. Evidence provided by RCC shows that this Code of Conduct is being communicated with delivery drivers on the Project.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Construction Parking				
B23	Prior to the commencement of construction, the Applicant must submit a Construction Worker Transportation Strategy to the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. The Strategy must include arrangements to prohibit workers using the informal path through the adjacent Council land to Cudgen Foreshore Park. A copy of the strategy must be provided to the Planning Secretary for information.	Kingscliff High School Construction Worker Transport Strategy, Richard Crookes Construction, 22/10/2021 Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021 Letter from SINSW to DPE, DOC21/1266283, 30/11/2021 DPE lodgment record, SSD-8744305-PA-2, 30/11/2021 Site inspection, 14/03/2022	Worker parking provisions are detailed in Section 2 of the Construction Worker Transportation Strategy, and alternate transport suggestions are provided in Section 4. Restrictions on the use of the informal path through the adjacent Council land to Cudgen Foreshore Park is discussed in Section 4. Signage was observed installed at the entrance to this path stating: "NO WORKERS PAST THIS POINT" (see site photos in Appendix E).	Compliant
Operational Noise – Design of Mechanical Plant and Equipment				
B24	Prior to installation of mechanical plant and equipment: a) a detailed assessment of mechanical plant and equipment demonstrating compliance with the relevant project specific noise criteria as recommended in the Noise and Vibration Impact Assessment, dated 27 July 2021 and prepared by Acoustic Works must be undertaken by a suitably qualified person; and b) evidence must be submitted to the Certifier that any noise mitigation recommendations identified in the assessment carried out under (a) have been incorporated into the design to ensure the development will not exceed the project specific noise criteria identified in the Noise and Vibration Impact Assessment, dated 27 July 2021 and prepared by Acoustic Works.	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Installation of mechanical plant and equipment is yet to commence.	Not triggered
Landscaping				
B25	Prior to the commencement of landscaping works, the Applicant must submit a revised Landscape Plan to the Certifier. The plan must be generally consistent with the plan submitted with the Response to Submissions but amended to: a) incorporate additional plants of local species as follows: i. a minimum of 80% locally occurring Australian native species and maximum of 20% non-locally occurring Australian native species to apply to all trees; ii. a minimum of 80% locally occurring Australian native species and maximum of 20% Australian native or exotic species to apply to other plants (shrubs, ground cover and similar); and iii. no environmental weed species; b) reflect any changes required to accommodate water quality measures proposed around the reconfigured car park; and c) comply with the recommendations of the Bushfire Assessment Report prepared by Cool Burn Fire and Ecology dated 21 July 2021	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Landscaping works are yet to commence.	Not triggered
Operational Waste Storage and Processing				
B26	Prior to the commencement of construction of waste storage and processing areas, the Applicant must obtain agreement from Council for the design of the operational waste storage area (where waste removal will be undertaken by Council). Where waste removal will be undertaken by a third party, evidence must be provided to the Certifier that the design of the operational waste storage area: a) is constructed using solid non-combustible materials; b) is designed to ensure the door/gate to the waste storage area is vermin proof and can be openable from both inside and outside the storage area at all times;	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Construction of waste storage and processing areas is yet to commence.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	c) includes a hot and cold water supply with a hose through a centralised mixing valve; d) is naturally ventilated or an air handling exhaust system must be in place; and e) includes signage to clearly describe the types of materials that can be deposited into recycling bins and general garbage bins.			
Intersection upgrade works				
B27	Prior to the commencement of construction of intersection upgrade works, the Applicant must submit plans and specifications to the satisfaction of the relevant roads authority for upgrades to the intersection of Cudgen Road/Oxford Street/McPhail Avenue to provide new right hand turning bays on Cudgen Road leading to Oxford Street and on Oxford Street leading into Cudgen Road/McPhail Avenue generally in accordance with the proposals set out in the Response to Submissions. <i>Note:</i> <ul style="list-style-type: none"> Approval must be obtained for roadworks under section 138 of the Roads Act 1993. All costs associated with the proposed road and pathway upgrade works must be borne by the Applicant. In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent. 	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Construction of intersection upgrade works is yet to commence.	Not triggered
Oxford Street Signposting and Line Marking				
B28	Prior to commencement of line marking or street sign works on Oxford Street, the Applicant must submit plans and specifications to the satisfaction of the relevant road authority. The plans and specifications must be submitted to the Planning Secretary for information and include the proposed line marking and sign posting works on Oxford Street to provide three additional parking spaces and delineate drop-off/pick-up spaces generally in accordance with the Response to Submissions. <i>Note:</i> <ul style="list-style-type: none"> Approval must be obtained for roadworks under section 138 of the Roads Act 1993. All costs associated with the proposed road and pathway upgrade works must be borne by the Applicant. In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent. 	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Line marking and street sign works on Oxford Street are yet to commence.	Not triggered
Pedestrian Infrastructure Works				
B29	Prior to the commencement of construction of pedestrian infrastructure upgrades, the Applicant must submit plans and specifications to the satisfaction of the relevant road authority for proposed pedestrian infrastructure upgrade works and provide a copy to the Planning Secretary for information. The works must include the proposed works described as items D1 to D7 in the Traffic and Transport Impact Assessment prepared by Bitzios dated 26 August 2021. <i>Note:</i> <ul style="list-style-type: none"> Approval must be obtained for roadworks under section 138 of the Roads Act 1993. All costs associated with the proposed road and pathway upgrade works must be borne by the Applicant. In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent. 	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Construction of pedestrian infrastructure upgrades is yet to commence.	Not triggered
Operations Access, Car Parking and Service Vehicle Arrangements				
B30	Prior to the commencement of construction of operational parking and access facilities, evidence of compliance of the design of operational parking and access arrangements with the following requirements must be submitted to the Certifier:	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Construction of operational parking and access facilities is yet to commence.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>a) a minimum of 99 on-site car parking spaces on site for use during operation of the development and designed in accordance with the latest versions of AS 2890.1 and AS 2890.6; and</p> <p>b) the swept path of the largest service vehicle entering and exiting the Site in association with the new work, as well as manoeuvrability through the site, must be in accordance with the latest version of AS 2890.2.</p>			
Utilities, Services and Stormwater				
B31	<p>Within six months of the commencement of construction or other timeframe agreed in writing by the Planning Secretary, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifier. The system must:</p> <p>a) be designed by a suitably qualified and experienced person(s);</p> <p>b) be generally in accordance with the conceptual design in the RTs;</p> <p>c) be in accordance with applicable Australian Standards;</p> <p>d) incorporate water quality treatment measures to the reconfigured car park;</p> <p>e) be prepared to the satisfaction of Council; and</p> <p>f) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines.</p>	<p>Civil Design Certification letter, ACOR Consultants, BR210028, dated 21/09/2021</p> <p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Email correspondence with Tweed Shire Council, between September 2021 and February 2022</p> <p>Interview with auditees, 07/03/2022</p>	<p>Civil Design Certification, including stormwater drainage drawings, including in Crown Certificate (Stage 1). Evidence of consultation with Tweed Shire Council provided.</p>	Compliant
B32	<p>Prior to the commencement of works that involve any connection of a private stormwater drain to a public stormwater drain, approval for the works must be obtained from Council / the Water Supply Authority.</p> <p>Notes:</p> <ul style="list-style-type: none"> Council advises that a detailed Erosion and Sediment Control Plan prepared in accordance with Tweed Shire Council Section D7.07 of Development Design Specification D7 - Stormwater Quality is required to be submitted with a stormwater drainage application. Council advises that a detailed Stormwater Management Plan (SWMP) for any permanent stormwater quality treatment is required to be prepared and be in accordance with Section D7.07 of Councils Development Design Specification D7 - Stormwater Quality 	<p>Stormwater Drainage Works Application No. SWD21/0523</p> <p>Email correspondence with Tweed Shire Council, between September 2021 and February 2022</p> <p>Aconex correspondence from RCC to Certifier (BM+G), RCC-GCOR-002485, 01/12/2021</p>	<p>Application submitted to Tweed Shire Council. Works that involve connection of a private stormwater drain to a public stormwater drain have not yet occurred on the Project.</p>	Not triggered
B33	<p>If the development is likely to disturb or impact upon water or sewer infrastructure (e.g.: extending, relocating or lowering of pipeline), written confirmation from the service provider that they have agreed to the proposed works must be submitted to the Certifier prior to the commencement of those works.</p>	<p>Interview with auditees, 07/03/2022</p>	<p>The auditees advised that no work likely to disturb or impact upon water or sewer infrastructure has been identified for the Project.</p>	Not triggered
B34	<p>Prior to the commencement of construction, the Applicant is required to accurately locate and identify any existing sewer main, stormwater line or other underground infrastructure within or adjacent to the site and the Certifier advised of its location and depth prior to commencing works and ensure there shall be no conflict between the proposed development and existing infrastructure.</p> <p>Notes:</p> <ul style="list-style-type: none"> Council advises that: <ul style="list-style-type: none"> applications for works that disturb or impact upon water or sewer infrastructure should be submitted as one package using Council's standard Section 68 Application form accompanied by the required attachments and the prescribed fee. The arrangements and costs associated with any adjustment to water and wastewater infrastructure shall be borne in full by the applicant/developer. any structures within the vicinity of the existing sewer (including bulk earthworks and proposed carpark) or any proposed sewer diversions must comply with Tweed Shire Council Development Design Specification D15 – Work in Proximity and TSC Development Design Specification D12 Sewerage System. a Sewer Management Plan and Construction Management Plan is required to be approved by Council prior to issue of an approval for works that disturb or impact upon water or sewer infrastructure. The Sewer Management Plan shall ensure that the adjacent trunk sewer infrastructure remains protected at all times during construction. The Construction Management Plan shall mitigate any effects on the adjacent sewer infrastructure from the construction of earthworks, civil and building works, including impacts any vibrations and/or heavy machinery. 	<p>Various reports regarding service identification, including from Downunder Locations</p>	<p>Evidence provided of extensive service location and identification work being conducted across the Project site, including potholing activities and preparatory works for trenching.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p><i>The plan shall also include details on any sewer diversion or bypass works including emergency response provisions in maintaining live sewer flows.</i></p> <ul style="list-style-type: none"> ○ <i>any premises proposing to discharge wastewater into Council's sewerage system other than domestic sewage, is required to submit to Council a completed Liquid Trade Waste Application for a Liquid Trade Waste Services Agreement. The Application is to be approved by the General Manager or his delegate prior to the commencement of works to discharge to Council's sewerage system.</i> ○ <i>an approved pretreatment device (e.g. grease arrestor, oil separator, basket traps) must be installed in accordance with Tweed Shire Council's Policy - Discharge of Liquid Trade Waste to the Sewerage System Submission of detailed hydraulic plans and specifications indicating the size, type and location of pre-treatment devices and full details of drainage installations in accordance with AS 3500 shall be submitted to Council for approval along with a Liquid Trade Waste Application Form and all required information required therein. Three copies of detailed hydraulic plans shall be submitted with all Liquid Trade Waste Applications indicating the size, type and location of pre-treatment devices. All plumbing and drainage installations to these devices must comply with AS3500.</i> ○ <i>a Section 306 application under the Water Management Act 2000 will need to be lodged prior to the commencement of works.</i> 			
Hazardous Materials Management Plan				
B35	<p>Prior to the commencement of construction, the Applicant is required to submit a Hazardous Materials Management Plan to the Certifier. The report must:</p> <ul style="list-style-type: none"> d) address the recommendations in the Hazardous Materials Survey for Kingscliff High School at 33 Oxford Street, Kingscliff prepared by Hazmat Services Pty Ltd, dated 31 March 2020 and Waste Management Plan for Kingscliff High School at 33 Oxford Street, Kingscliff prepared by HMC Environmental Consulting Pty Ltd dated March 2021; e) provide details of management of risks associated during demolition work and for any remaining in-situ hazardous materials located at the site; and f) comply with the relevant NSW Legislation, Codes and Practice and Australian Standards. 	Interview with auditees, 07/03/2022	<p>Non-compliance: A Hazardous Materials Management Plan has not yet been prepared for the Project and submitted to the Certifier, despite construction commencing on 21/12/2021.</p> <p>Whilst works associated with hazardous material management are yet to commence, the Project has not prepared a Staging Report for construction, therefore there is no flexibility recognised in the timing of this condition.</p>	Non-compliant
Dewatering Management Plan				
B36	<p>Prior to the commencement of construction, a Dewatering Management Plan is to be prepared by a suitably qualified and experienced person and submitted to the Certifier that:</p> <ul style="list-style-type: none"> a) considers Council's Dewatering in the Tweed Guideline; b) meets the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZAG 2018); c) includes site plans which indicate the extent of the excavation area and estimated zone of influence of the dewatering activity relative to any adjoining buildings together with an assessment of any impacts likely to occur to any adjoining buildings as a result of the dewatering activities; d) the location to be indicated on the site plan of the area that will be used for the positioning of any treatment tank or sedimentation pond on the site including any reserve area to be used for such purpose in the event of the need to additional treatment facilities to be incorporated on the site; e) details of the method of mechanical aeration to be used in the event that it is necessary to aerate the groundwater to achieve an acceptable Dissolved Oxygen level prior to the offsite discharge of groundwater and where this will be incorporated on the site; f) the provision of written advice from the operator of any onsite groundwater treatment system stating that the system to be used will be able to treat the groundwater to the required treatment level prior to discharge, including required detention times prior to discharge of the groundwater; and g) considers the Detailed Site Investigation for Contamination Far North Coast Schools Project Kingscliff Public School, 33 Oxford Street, Kingscliff NSW 2487, dated July 2021 and prepared by Douglas Partners. 	<p>Kingscliff High School Dewatering Management Plan, Env Solutions, Rev 2, 02/12/2021</p> <p>Letter from Certifier to MBB Group, dated 10/02/2022</p>	<p>Dewatering Management Plan was submitted on the 3/12/2021, as documented in letter from Certifier to MBB Group (dated 10/02/2022).</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Contamination				
B37	Where demolition works to a building require the removal of building slab on ground, prior to the disturbance of the slab, the Applicant must conduct site investigations to confirm if the site is contaminated by organochloride pesticides and comply with the following requirements: <ul style="list-style-type: none"> a) the site investigations must be undertaken, and the subsequent report(s), must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the <i>Contaminated Land Management Act 1997</i> and Council's Pre-Demolition Testing Guideline; and b) the reports must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme 	Interview with auditees, 07/03/2022	Not yet triggered as demolition not yet commenced. Project to ensure this condition is met prior to commencement of demolition that requires removal of slab.	Not triggered
B38	Where site investigations undertaken under condition B37 have identified the presence of contamination from organochloride pesticides, the Applicant must prepare a Remediation Action Plan, which details a remediation strategy and includes an unexpected finds procedure. The Remediation Action Plan is to be approved by an EPA accredited Site Auditor. The unexpected finds procedure must be implemented throughout duration of project work	Interview with auditees, 07/03/2022	To be determined following completion of site investigations to confirm if the site is contaminated by organochloride pesticides (as per B37).	Not triggered
B39	The Applicant must ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site that would result in significant contamination.	Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 3, 09/12/2021	Contamination to be managed in line with unexpected finds process included in Section 5 of the Project CEMP. The auditees advised that no unexpected contamination finds have been identified on the Project to date.	Not triggered
PART C DURING CONSTRUCTION				
Site Notice				
C1	A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purpose of informing the public of project details and must satisfy the following requirements: <ul style="list-style-type: none"> a) minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size; b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period; c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice(s); and d) the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted. 	Site inspection, 14/03/2022	A site notice was observed displayed at the entry point to the construction site on Oxford Street (see site photos in Appendix E). The notice meets the requirements of C1.	Compliant
Operation of Plant and Equipment				
C2	All construction plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner.	Equipment Induction – Excavator, Hammertech system output	The auditees provided example equipment induction records, which are recorded in the Hammertech system. Record includes initial plant induction checks, servicing requirements, and permits associated with the plant (e.g. excavation permits).	Compliant
Demolition				
C3	Demolition work must comply with the demolition work plans required by Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001) and endorsed by a suitably qualified person as required by condition B13.	Demolition Management Plan Kingscliff High School, PF 879, Demex, Rev 3.0, 13/10/2021 Compliance Statement – Demolition, Demex, 01/12/2021	Demolition has not yet commenced.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Construction Hours				
C4	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: c) between 7am and 6pm, Mondays to Fridays inclusive; and d) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays.	Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 09/12/2021 Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022	Hours of work are included in Section 6.3 of the CNVMSP and mentioned in the site induction. Observation: The site induction only notes that site hours are 7 am – 5 pm and does not specify days of work or clarity around weekend hours. The auditor recommends that the site induction presentation be updated to include full hours of work, as per C4.	Compliant
C5	Notwithstanding condition C4, provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours: a) between 6pm and 7pm, Mondays to Fridays inclusive; and b) between 1pm and 4pm, Saturdays.	Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 09/12/2021 Interview with auditees, 07/03/2022	Hours of work are included in Section 6.3 of the CNVMSP. The auditees advised that no out of hours works under C5 have been conducted during the audit period.	Not triggered
C6	Construction activities may be undertaken outside of the hours in condition C4 and C5 if required: a) by the Police or a public authority for the delivery of vehicles, plant or materials; or b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or c) where the works are inaudible at the nearest sensitive receivers; or d) for the delivery, set-up and removal of construction cranes, where notice of the crane-related works is provided to the Planning Secretary and affected residents at least seven days prior to the works; or e) where a variation is approved in advance in writing by the Planning Secretary or his nominee if appropriate justification is provided for the works.	Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 09/12/2021 Interview with auditees, 07/03/2022	Hours of work are included in Section 6.3 of the CNVMSP. The auditees advised that no out of hours works under C6 have been conducted during the audit period.	Not triggered
C7	Notification of such construction activities as referenced in condition C6 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	Interview with auditees, 07/03/2022	The auditees advised that no out of hours works under C6 have been conducted during the audit period.	Not triggered
C8	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: a) 9am to 12pm, Monday to Friday; b) 2pm to 5pm Monday to Friday; and c) 9am to 12pm, Saturday.	Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 09/12/2021 Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Restrictions around when the Project can carry out high impact noise activities are addressed in Section 6.3 of the CNVMSP. The auditees advised that no high impact noise works, as described in C8, have been conducted on the Project to date.	Not triggered
Implementation of Management Plans				
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	CEMP and Sub-Plans checklist (Appendix B of this report) Site inspection, 14/03/2022	Non-compliance: A review was conducted to verify whether the Project was being delivered in accordance with the CEMP and Sub-Plans, and a non-compliance has been identified against the commitment for the ESR to conduct weekly and post-rainfall inspections of site environmental controls as per section 1.11.2 of the CEMP. The auditees advised that the frequency of inspections was affected by the significant rainfall events and flooding that occurred in the area since construction commencement, as well as COVID-19. Understanding that the ability to conduct weekly inspections has been limited by these events, the auditor notes that there is no record of post-rainfall inspections being undertaken on the Project, despite numerous significant rainfall events occurring this year. This has been raised as a non-compliance against C9.	Non-compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			<p>The auditor further fC9</p> <p>the following:</p> <ul style="list-style-type: none"> • CTPMSP, Section 9 – The auditees noted that the requirement to inspect traffic control devices a minimum of three times daily was meant to be specifically related to electronic traffic control devices (which have not yet been used on the Project). The auditees noted that Section 9 of the CTPMSP was going to be amended to correct this in the latest revision of the Plan, however this has not been rectified. • CSWMSP, Section 6.1.2.1 – The version of the site ERSD plan observed at the time of the audit did not fully reflect the controls in place onsite, showing use of a rumble grid at site entrance and instead of the gabion rumble grid that has been installed at the compound egress gate. • CSWMSP, Section 6.2 – There appears to be a misunderstanding around base line surface water monitoring and its applicability to the Project. There is no evidence of base line monitoring being conducted as per the CWSMP and the auditor observes that there have been no discharges on the Project to date. The auditor recommends reviewing this commitment given that construction has commenced and that the window to conduct base line monitoring has now passed. • BMSP, Section 3.2, Table 6 – The Project Site Induction includes a map detailing environmental exclusion zones; however, it does not specifically reference the Bush Stone-curlew and its potential to nest or roost within the and around the school. All Project personnel should be made aware of the potential for this species to occur within the work area and what to do if found onsite. • BMSP, Section 3.3, Table 7 – The auditees advised that weed management is being undertaken by a land maintenance contractor (Justin Barlow Gardening Services). It is not clear whether weed survey and management has been conducted by a suitably qualified and experienced person, as required under the BMSP. • FERP, Section 6.1.1 – The first step in the Flood Emergency Response Plan in section 6 of the FERP includes the following action: “Actions from Section 4.3 of this report will be included in the WHS site induction.” The auditor noted that section 4.3 of the report (FERP) is a brief section on site flooding and does not include any actions. 	
Construction Traffic				
C10	All construction vehicles (excluding site personnel vehicles) are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site or an approved on-street work zone before stopping.	Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 9, 01/03/2022 Kingscliff High School Driver Code of Conduct, Richard Crookes Construction	No construction vehicles were observed outside of the Project site during the inspection. No complaints regarding construction vehicles have been received in relation to the Project.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Site inspection, 14/03/2022 Complaints update, February 2022		
Hoarding Requirements				
C11	The following hoarding requirements must be complied with: a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and 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.	Site inspection, 14/03/2022 Complaints update, February 2022	No advertising or graffiti was observed during the site inspection. No complaints have been received relating to advertising or graffiti on the Project.	Compliant
No Obstruction of Public Way				
C12	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances.	Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 9, 01/03/2022 Site inspection, 14/03/2022 Complaints update, February 2022	No obstructions to the public way were observed during the site inspection. No complaints relating to public access have been received in relation to the Project.	Compliant
Construction Noise Limits				
C13	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Plan.	Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 09/12/2021 Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022 Complaints update, February 2022	Noise mitigation is being implemented in line with the CNVSMP. It is noted that the Project is in the early stages of construction with limited plant and equipment in operation onsite. No noise complaints have been received in relation to the Project.	Compliant
C14	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 C4.	Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 09/12/2021 Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022 Kingscliff High School Driver Code of Conduct, Richard Crookes Construction Complaints update, February 2022	Requirement included in Section 7 of the CNVMSP and addressed in Site Induction and Driver Code of Conduct. No complaints regarding construction vehicles have been received in relation to the Project.	Compliant
C15	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' to ensure noise impacts on surrounding noise sensitive receivers are minimised.	Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 09/12/2021 Site inspection, 14/03/2022 Complaints update, February 2022	The requirement to use quackers is included in Section 7 of the CNVMSP. No noise complaints have been received in relation to the Project. No plant movements were occurring on site during the inspection.	Compliant
Vibration Criteria				
C16	Vibration caused by construction at any residence or structure outside the site must be limited to:	Construction Noise and Vibration Management Sub-Plan – Kingscliff High	No vibration-generating works have been conducted to date.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> 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 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>School Upgrade, Richard Crookes Constructions, Rev 4, 09/12/2021</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>		
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	<p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	The auditees advised that vibratory compactors have not been used as part of Project works during the audit period.	Not triggered
C18	The limits in conditions C16 and C17 apply unless otherwise outlined in a Construction Noise and Vibration Management Plan, approved as part of the CEMP required by condition B17 of this consent	<p>Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 3, 09/12/2021</p> <p>Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 09/12/2021</p>	There is nothing within the CEMP or CNVMSP to indicate that alternative vibration limits to those specified in C16 and C17 have been proposed/adopted by the Project.	Not triggered
Tree Protection				
C19	<p>For the duration of the construction works:</p> <ul style="list-style-type: none"> a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; b) all street trees immediately adjacent to the approved disturbance area / property boundaries must be protected at all times during construction in accordance with Council's tree protection requirements. Any street tree, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of Council; c) all trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the Arboricultural Impact Assessment prepared by Treescience dated May 2021 as amended by the Addendum to the Arboricultural Impact Assessment, prepared by Arbor Ecological and dated 26 August 2021; and d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater. 	<p>Biodiversity Management Sub-Plan – Kingscliff High School Upgrade, Kleinfelder, Rev 2.0, 09/12/2021</p> <p>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>The auditees noted that the Project has not resulted in any street trees being trimmed, removed, or damaged during an emergency.</p> <p>The site is fenced and the Project has sign posted environmental protection zones (see site photos in Appendix E).</p> <p>Trees being retained have been fenced with ATF and sign posted to protect them during construction works (see site photos in Appendix E).</p>	Compliant
Air Quality				
C20	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	<p>Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 3, 09/12/2021</p> <p>Site inspection, 14/03/2022</p>	<p>Section 2 of the Project's CEMP includes measures to managed dust and odour during construction.</p> <p>Ground investigation works (drilling of bore holes) were taking place at the time of the site inspection. The inspection took place post-rainfall, and no dust management issues were observed.</p>	Compliant
C21	<p>During construction, the Applicant must ensure that:</p> <ul style="list-style-type: none"> a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; 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. 	<p>Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 3, 09/12/2021</p> <p>Site inspection, 14/03/2022</p>	<p>Section 2 of the Project's CEMP includes measures to managed dust and odour during construction.</p> <p>No air quality issues were observed during the site inspection. The site is currently predominately covered with existing hardstand (asphalt).</p> <p>There were no trucks entering or leaving site at the time of inspection. Site access/egress points were stabilised and the adjacent public road was clean.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Imported and Exported Fill				
C22	<p>The Applicant must:</p> <ol style="list-style-type: none"> ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site; keep accurate records of the volume and type of fill to be used; make these records available to the Certifier upon request; ensure the exportation of waste (including fill or soil) from the site is in accordance with the provisions of the Protection of the Environment Operations Act 1997 and the NSW Environment Protection Authority "Waste Classification Guidelines"; and ensure the exportation of waste is transported to a licenced waste facility or an approved site subject to a resource recovery order and exemption. 	<p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>The auditees reported that there has been no exportation of spoil waste from site or importation of fill material during the audit period.</p>	Not triggered
Disposal of Seepage and Stormwater				
C23	<p>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.</p>	<p>Construction Soil and Water Management Sub-Plan – Kingscliff High School Upgrade: Appendix A 'ESCP Drawing', Richard Crookes Constructions, Rev 3, 09/12/2021</p> <p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>Erosion and sediment controls have been installed onsite in line with the ESCP. The majority of the worksite remains sealed with hardstand. The ESCP is included in the CSWMSP, which has been issued to the Certifier.</p> <p>No active discharge of water to Council's stormwater system has taken place.</p>	Not triggered
Emergency Management				
C24	<p>The Applicant must prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes, for the duration of construction.</p>	<p>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p> <p>Workers Inducted Report, 01/06/2021 to 07/03/2022 (267 workers inducted for both Kingscliff High School and Kingscliff Public School projects)</p>	<p>Emergency assembly points and evacuation routes are included in the Project induction presentation.</p>	Compliant
Aboriginal Heritage				
C25	<p>All reasonable steps must be taken so as not to harm, modify or otherwise impact Aboriginal objects except as authorised by this approval.</p>	<p>Kingscliff High School Aboriginal Cultural Heritage Management Plan, EMM, Version 4, 17/11/2021</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>The Aboriginal Cultural Heritage Management Plan (ACHMP) notes that no Aboriginal sites or deposits have been identified within the Project area.</p> <p>The Project has an unexpected finds protocol in place, as detailed in section 4.3.2 of the ACHMP. The auditees advised that no unexpected Aboriginal heritage finds were identified during the audit period as part of Project construction.</p>	Compliant
C26	<p>Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by EMM Consulting dated April 2021.</p>	<p>Kingscliff High School Aboriginal Cultural Heritage Management Plan, EMM, Version 4, 17/11/2021</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>Observation: Section 4.3.1 of the ACHA report prepared by EMM requires the following:</p> <p>"All employees, contractors, sub-contractors involved in ground-disturbing activities will undergo an Aboriginal cultural heritage induction. For key project team members, this will be conducted by a representative of the RAPs prior to any ground-disturbance."</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			Evidence has been provided of some Project personnel from RCC, MBB Group, and SINSW undergoing an Aboriginal cultural heritage induction in July 2021, presented by Tweed Byron Local Aboriginal Land Council (LALC). However, there is no evidence to demonstrate further induction of employees, contractors, sub-contractors involved in ground-disturbing activities (noting that ground investigation works that were taking place onsite at the time of the site inspection). Understanding these works are minor, the Project is to ensure that the above requirement is met prior to commencement of excavation activities onsite.	
Unexpected Finds Protocol – Aboriginal Heritage				
C27	In the event that surface disturbance identifies a new Aboriginal object: <ul style="list-style-type: none"> f) all works must halt in the immediate area to prevent any further impacts to the object(s); g) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects; h) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS; i) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and j) works shall only recommence with the written approval of the Planning Secretary 	Kingscliff High School Aboriginal Cultural Heritage Management Plan, EMM, Version 4, 17/11/2021 Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 3, 09/12/2021 Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	The auditees advised that no unexpected Aboriginal heritage finds were identified during the audit period as part of Project construction. Tables 4.1 and 4.2 of the Aboriginal Cultural Heritage Management Plan provide protocols for the management of unexpected cultural materials and skeletal/human remains, respectively. This protocol is also duplicated in section 6.2.1 of the Project’s Construction Environmental Management Plan. Observation: The unexpected finds protocol in the CEMP and ACHMP does not include the requirement that, following identification of a new Aboriginal object, works can only recommence with the written approval of the Planning Secretary, as per C27(e).	Not triggered
Unexpected Finds Protocol– Historic Heritage				
C28	If any unexpected archaeological relics are uncovered during the work, then: <ul style="list-style-type: none"> a) all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary; b) depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW; and c) works may only recommence with the written approval of the Planning Secretary. 	Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 3, 09/12/2021 Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	The auditees advised that no unexpected historic heritage finds were identified during the audit period as part of Project construction. An unexpected finds protocol for Non-Aboriginal heritage is included in section 6.2.2 of the Project’s Construction Environmental Management Plan. The protocol aligns with the requirements of C28.	Not triggered
Waste Storage and Processing				
C29	All waste generated during construction 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.	Construction Waste Management Sub-plan, Richard Crookes Constructions, Rev 2, 09/12/2021 Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Waste storage bins were sighted onsite during the inspection conducted 14/03/2022. See site photos in Appendix E. No waste was observed leaving site onto neighbouring public or private properties. Control measures for waste handling and storage onsite are detailed in section 5.1.2 of the Project’s Construction Waste Management Sub-plan.	Compliant
C30	All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	All waste removed from site to date has been pre-classified as construction and demolition waste under the <i>Waste Classification Guidelines Part 1: Classifying Waste</i> (EPA, 2014).	Compliant
C31	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	The auditees advised that concreting was undertaken as part of COLA works, highlighting that concrete washout bays were provided and all drainage pits covered and bunded to ensure no slurry from the pour location made its way into watercourses.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			No concreting works were being undertaken onsite during the site inspection on 14/03/2022. No evidence of concrete waste or rinse water was observed.	
C32	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.	Waste Management Tracking, last entry 28/01/2022 Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Project Waste Management Tracking provided, which includes one entry for 71 tonnes of concrete waste removed by Bosh Bins to JGI Oxenford. The auditees advised that this concrete waste was generated as part of the COLA construction. The auditees noted some difficulties in obtaining waste tracking information from the waste contractor and are in the process of addressing this before construction activities increase onsite.	Compliant
C33	The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance with the requirements of the relevant legislation, codes, standards and guidelines.	Demolition Management Plan Kingscliff High School, PF 879, Demex, Rev 3.0, 13/10/2021 Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	The auditees advised that no hazardous materials were removed as part of the SSD works during the audit period. Further, no hazardous materials have been identified in the buildings to be demolished (northern 2-storey brick office structure and covered area roof to courtyard area north of Block C).	Not triggered
Hazardous Materials				
C34	At the completion of any hazardous material removal work and prior to any subsequent demolition or alteration work commencing, a clearance inspection of the relevant work area must be conducted by a competent person, or in the case of asbestos, by a Licensed Asbestos Assessor. Where applicable, a clearance certificate issued by a licensed asbestos assessor which states that the site 'does not pose a risk to health and safety from exposure to asbestos' in accordance with Clause 474 of the Work Health and Safety Regulation 2017 must be submitted to the Certifier and a copy provided to Council with the clearance certificate within 7 days of completion of the clearance inspection.	Hazardous Materials Survey, Kingscliff High School, Hazmat Services, R1, 31/03/2020 Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	Hazardous materials survey conducted for the site recommended adoption of unexpected finds process. It also recommended the following action be implemented: <i>"Synthetic Mineral Fibre (SMF) materials should be removed under controlled conditions prior to demolition /refurbishment works, in accordance with the requirements of the Code of Practice for the SafeUse of Synthetic Mineral Fibres [NOHSC:2006(1990)]."</i> Demolition has not yet commenced on the Project.	Not triggered
Outdoor Lighting				
C35	The Applicant must ensure that all external lighting is constructed and maintained in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting	Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	The only construction phase lighting is that on the site sheds. The lights did not appear to be directed at any receivers or excessive in lumens. The lights are switched off at night. No complaints have been received.	Compliant
Independent Environmental Audit				
C36	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Letter DPE to SINSW, 01/12/2021	The audit team was approved by the Department prior to commencing this first Independent Audit.	Compliant
C37	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.	This audit	This audit has been conducted in accordance with the Independent Audit Post Approval Requirements.	Compliant
C38	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those agreed to above, upon giving at least 4 weeks' notice to the Applicant of the date or timing upon which the audit must be commenced.	Interview with auditees, 07/03/2022	The auditees are not aware of the Planning Secretary requiring audits to be conducted at different timeframes to that specified in the Independent Audit Post Approval Requirements.	Not triggered
C39	In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must: a) review and respond to each Independent Audit Report prepared under condition C37 of this consent, or condition C38 where notice is given; b) submit the response to the Planning Secretary; and c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary.	This audit	This is the first Independent Audit conducted for the project.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C40	Independent Audit Reports and the applicant/proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements unless otherwise agreed by the Planning Secretary.	This audit	This requirement is due following finalisation of the Audit Report. The site inspection was conducted on 14/03/2022. The Audit Report is due 14/05/2022.	Not triggered
C41	Notwithstanding the requirements of the Independent Audit Post Approval Requirements, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.	Site inspection, 14/03/2022	The Project is currently in construction.	Not triggered
Operation Readiness Work				
C42	Operational readiness work must not commence on site until the following details have been submitted to the Certifier: <ul style="list-style-type: none"> a) a plan and description of the area(s) of the site to be used for operational readiness work (including pedestrian access) and areas still under construction (including construction access); b) the maximum number of staff to be involved in operational readiness work on site at any one time; c) arrangements to ensure the safety of school staff on the site, including how: <ul style="list-style-type: none"> i. areas to be used for operational readiness work will be clearly and securely separated from the areas of the site still under construction; ii. pedestrian access to and within the site will be managed to ensure no conflict with construction vehicle movements; and d) access and parking arrangements to minimise impacts on the surrounding street network having regard to number of staff involved in operational readiness work on site at any one time and parking arrangements for construction workers on site 	Letter INSW to DPE, DOC21/1323432, 14/12/2021 Interview with auditees, 07/03/2022 Site inspection, 14/03/2022	The Project commenced construction on 20/12/2021 and is not due to commence operation until August 2022.	Not triggered
C43	Operational readiness work must only be undertaken in accordance with the details submitted under condition C42 and the following requirements: <ul style="list-style-type: none"> a) no more than 15 staff are involved in operational readiness work; b) no students or parents are permitted; and c) the Applicant has implemented appropriate arrangements to ensure the safety of school staff. 	Refer to C42.	Refer to C42.	Not triggered
PART D PRIOR TO OCCUPATION OR COMMENCEMENT OF USE				
Notification of Occupation				
D1	At least one month before commencement of operation, the date of commencement of the operation of the development must be notified to the Planning Secretary in writing. If the operation of the development is to be staged, the Planning Secretary must be notified in writing at least one month before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	-	-	Not Triggered
External Walls and Cladding				
D2	Prior to commencement of operation, the Applicant must provide the Certifier with documented evidence that the products and systems used in the construction of external walls including finishes and claddings such as synthetic or aluminium composite panels comply with the requirements of the BCA.	-	-	Not Triggered
D3	The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Works as Executed Plans				
D4	Prior to the commencement of operation, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifier. A CCTV inspection of the stormwater pipes and sewerage system that are to be dedicated to Council as public infrastructure including joints and junctions must be submitted to Council to demonstrate that the standard of the system is acceptable.	-	-	Not Triggered
Warm Water Systems and Cooling Systems				
D4	Prior to the commencement of operation, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifier. A CCTV inspection of the stormwater pipes and sewerage system that are to be dedicated to Council as public infrastructure including joints and junctions must be submitted to Council to demonstrate that the standard of the system is acceptable.	-	-	Not Triggered
Outdoor Lighting				
D6	Prior to the commencement of operation, the Applicant must submit evidence from a suitably qualified practitioner to the Certifier that demonstrates that installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers and: <ul style="list-style-type: none"> a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and b) has been mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network. 	-	-	Not Triggered
Mechanical Ventilation				
D7	Prior to commencement of operation, the Applicant must provide evidence to the satisfaction of the Certifier that the installation and performance of the mechanical ventilation systems complies with: <ul style="list-style-type: none"> a) AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and other relevant codes; and b) any dispensation granted by Fire and Rescue NSW 	-	-	Not Triggered
D8	If window systems to be used are not openable or are required to remain closed in order to satisfy the requirements of the Noise and Vibration Impact Assessment, dated 27 July 2021 and prepared by Acoustic Works, then a system of mechanical ventilation complying with the relevant provisions of the Building Code of Australia must be installed to service the buildings	-	-	Not Triggered
Operational Noise – Design of Mechanical Plant and Equipment				
D9	Prior to the commencement of operation, the Applicant must submit evidence to the Certifier that the noise mitigation recommendations in the assessment undertaken under condition B24 have been incorporated into the design of mechanical plant and equipment to ensure the development will not exceed the project specific noise criteria identified in the Noise and Vibration Impact Assessment, dated 27 July 2021 and prepared by Acoustic Works.	-	-	Not Triggered
Fire Safety Certification				
D10	Prior to commencement of occupation, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety Certificate must be submitted to the relevant authority and Council. The Fire Safety Certificate must be prominently displayed in the building	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
Structural Inspection Certificate				
D11	<p>Prior to the commencement of occupation of the relevant parts of any new or refurbished buildings, a Structural Inspection Certificate or a Compliance Certificate must be submitted to the Certifier. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the approval authority and the Council after:</p> <ul style="list-style-type: none"> a) the site has been periodically inspected and the Certifier is satisfied that the structural works is deemed to comply with the final design drawings; and b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s 	-	-	Not Triggered
Compliance with Food Code				
D12	<p>Prior to the commencement of operation, the Applicant is to obtain a certificate from a suitably qualified tradesperson, certifying that any kitchen, food storage and food preparation areas used in connection with the sale of food have been fitted in accordance with the AS 4674 Design, construction and fit-out of food premises and provide evidence of receipt of the certificate to the satisfaction of the Certifier.</p> <p><i>Note: Any applicable approvals are to be obtained from Council.</i></p>	-	-	Not Triggered
Post-Construction Dilapidation Report – Protection of Public Infrastructure				
D13	<p>Prior to the commencement of operation, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must:</p> <ul style="list-style-type: none"> a) ascertain whether the construction works created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition B5 of this consent; b) have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads). c) be submitted to the Certifier; d) be forwarded to Council for information; and e) be provided to the Planning Secretary when requested. 	-	-	Not Triggered
Repair of Public Infrastructure				
D14	<p>Unless the Applicant and the relevant public authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the construction works; and/or b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development; and/or c) pay compensation for the damage as agreed with the owner of the public infrastructure. <p><i>Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions of this consent.</i></p>	-	-	Not Triggered
Road Damage				
D15	<p>Prior to the commencement of operation, the cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Subject Site as a result of construction works associated with the approved development must be met in full by the Applicant.</p>	-	-	Not Triggered
Post-Construction Survey – Residential Properties				
D16	<p>Where a pre-construction survey has been undertaken in accordance with condition B8 prior to the commencement of operation the Applicant must engage a suitably qualified and experienced expert</p>	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must:</p> <ul style="list-style-type: none"> a) document the results of the post-construction survey and compare it with the preconstruction survey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition B8; b) be provided to the owner of the relevant buildings surveyed; c) be provided to the Certifier; and d) be provided to the Planning Secretary when requested. e) Where the Post-Construction Survey Report determines that damage to the identified property occurred as a result of the construction works, the Applicant must repair, or pay the full costs associated with repairing the damaged buildings, within an agreed timeline between the owner of the identified property and the Planning Secretary. Alternatively, the Applicant may pay compensation for the damage as agreed with the property owner. 			
Intersection upgrade works				
D17	Prior to the commencement of operation or other timeframe agreed in writing by the Planning Secretary, evidence must be submitted to the Certifier that demonstrates that the works approved under condition B27 have been completed to the satisfaction of the relevant roads authority.	-	-	Not Triggered
Oxford Street Signposting and Line Marking				
D18	<p>Prior to the commencement of operation or other timeframe agreed in writing by the Planning Secretary, evidence must be submitted to the Certifier that demonstrates that the works approved under condition B28 have been completed to the satisfaction of the relevant roads authority.</p> <p><i>Note:</i></p> <ul style="list-style-type: none"> • Approval must be obtained for roadworks under section 138 of the Roads Act 1993. • All costs associated with the proposed road and pathway upgrade works must be borne by the Applicant. • In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent. 	-	-	Not Triggered
Pedestrian Infrastructure Upgrade Works				
D19	<p>Prior to the commencement of operation, the Applicant must complete the pedestrian infrastructure upgrade works approved under condition B29 to the satisfaction of the relevant road authority.</p> <p><i>Note:</i></p> <ul style="list-style-type: none"> • Approval must be obtained for roadworks under section 138 of the Roads Act 1993. • All costs associated with the proposed road and pathway upgrade works must be borne by the Applicant. • In accordance with Section 4.42 of the Environmental Planning and Assessment Act 1979, an approval under Section of the 138 Roads Act 1993 cannot be refused if it is necessary for carrying out state significant development that is authorised by a development consent and is substantially consistent with the consent. 	-	-	Not Triggered
Car Parking Arrangements				
D20	Prior to the commencement of operation or other timeframe agreed in writing by the Planning Secretary, evidence must be submitted to the Certifier that demonstrates that works associated with the reconfiguration of the car park to create 99 parking spaces on site have been completed.	-	-	Not Triggered
Bicycle Parking and End-of-Trip Facilities				
D21	Prior to the commencement of operation, compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the Certifier:	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> a) the provision of a minimum 90 bicycle and scooter parking spaces; b) the layout, design and security of bicycle facilities must comply with the minimum requirements of the latest version of AS 2890.3:2015 Parking facilities - Bicycle parking, and be located in easy to access, well-lit areas that incorporate passive surveillance; c) the provision of end-of-trip facilities for staff; and d) appropriate pedestrian and cyclist advisory signs are to be provided. <p><i>Note: All works/regulatory signposting associated with the proposed development shall be at no cost to the relevant roads authority.</i></p>			
School Zones				
D22	<p>Prior to the commencement of operation, all required School Zone signage, speed management signage and associated pavement markings must be installed, inspected by TfNSW and handed over to TfNSW.</p> <p><i>Note: Any required approvals for altering public road speed limits, design and signage are required to be obtained from the relevant consent authority.</i></p>	-	-	Not Triggered
D23	<p>The Applicant must maintain records of all dates in relation to installing, altering and removing traffic control devices related to speed.</p>	-	-	Not Triggered
School Transport Plan				
D24	<p>Prior to the commencement of operation, a School Transport Plan (STP), must be submitted to the satisfaction of the Planning Secretary. The plan must:</p> <ul style="list-style-type: none"> a) be prepared by a suitably qualified consultant in consultation with Council and TfNSW; b) include arrangements to promote the use of active and sustainable transport modes, including: <ul style="list-style-type: none"> i. objectives and modes share targets (i.e. Site and land use specific, measurable and achievable and timeframes for implementation); ii. specific tools and actions to help achieve the objectives and mode share targets; iii. details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development. c) include operational transport access management arrangements, including: <ul style="list-style-type: none"> i. detailed pedestrian analysis including the identification of safe route options to identify the need for management measures such as staggered school start and finish times to ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish; ii. the location of all car parking spaces on the school campus and their allocation (i.e. staff, visitor, accessible, emergency, etc.); iii. the location and operational management procedures of the drop-off and pick-up parking, including staff management/traffic controller arrangements; iv. the location and operational management procedures for the drop-off and pick-up of students by buses and coaches including staff management/traffic controller arrangements; v. delivery and services vehicle and bus access and management arrangements; vi. management of approved access arrangements; vii. potential traffic impacts on surrounding road networks, including the upgraded Cudgen Road/Oxford Street intersection, and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing drop-off and pick-up zones; 	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> viii. car parking arrangements and management associated with the proposed use of school facilities by community members; and d) measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the plan; and e) a monitoring and review program, including <ul style="list-style-type: none"> i. a review of impacts on nearby streets and intersection, including potential queuing and school users parking on residential streets; and ii. consideration of measures required to address impacts in consultation with relevant stakeholders. 			
D25	Prior to the commencement of operation, the Applicant must submit a Complaints Handling Management Plan to the Certifier and a copy provided to the Planning Secretary of information. The Plan must include a complaints handling management system in relation to parking concerns raised by the surrounding community and include processes and actions for the school to address concerns raised.	-	-	Not Triggered
Utilities and Services				
D26	<p>Prior to commencement of operation, a compliance certificate under the section 307 of the Water Management Act 2000 must be obtained from Council and submitted to the Certifier.</p> <p>Note:</p> <ul style="list-style-type: none"> • Council advises that the Section 64 Contributions for this development at the date of this approval have been estimated as: <ul style="list-style-type: none"> ○ Water: 9.18 ET @ \$11,442 = \$105,037.60 ○ Sewer: 15.3 ET @ \$7,400 = \$113,220.00 	-	-	Not Triggered
D27	Prior to the commencement of operation or other timeframe agreed in writing by the Planning Secretary, easements must be created under the Conveyancing Act 1919 over public sewer, water supply and drainage infrastructure on the site, including a 3m wide easement over the relocated stormwater pipe. The instrument(s) is to nominate Tweed Shire Council as the Authority to revoke, vary or modify the easement(s)	-	-	Not Triggered
D28	Prior to the commencement of operation, evidence must be provided to the Water Supply Authority that no structures are constructed over the existing sewer and/or structures over the existing sewer to meet the Tweed Shire Council D15 - Work in Proximity Specification	-	-	Not Triggered
Stormwater Operation and Maintenance Plan				
D29	<p>Prior to the commencement of operation, a Stormwater Operation and Maintenance Plan (SOMP) is to be submitted to the Certifier. The SOMP must ensure the proposed stormwater quality measures remain effective and contain the following:</p> <ul style="list-style-type: none"> a) maintenance schedule of all stormwater quality treatment devices; b) record and reporting details; c) relevant contact information; and d) Work Health and Safety requirements. 	-	-	Not Triggered
Koala Offset Management Plan				
D30	<p>Prior to the commencement of operation, a site based Koala Offset Management Plan (KOMP) must be prepared by a suitably qualified professional in accordance with 'Appendix C – Offset Provisions' of the Tweed Coast Comprehensive Koala Plan of Management 2020 (TCCCKPoM 2020). The KOMP must be prepared to the satisfaction of Council and a copy provided to the Planning Secretary for information. The KOMP include the following:</p> <ul style="list-style-type: none"> a) accurate calculation of Preferred Koala Food Tree (PKFT) offsets based on the Arboricultural Impact Assessment prepared by Treescience dated May 2021 as amended 	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>by the Addendum to the Arboricultural Impact Assessment, prepared by Arbor Ecological and dated 26 August 2021 (identifying PKFT's to be removed to facilitate the development) to be provided at offset ratios specified in the TCCKPoM 'Appendix C, Table 2: Offset pathway for other development outside of a KAP or KLP' for the Southern Koala Management Area – Onsite.</p> <p>b) a suitably scaled plan showing the metes and bounds of the Koala Offset Area on site that meets the following criteria:</p> <ol style="list-style-type: none"> i. the entire quantum of calculated offsets to be delivered on site; ii. the offset area/s must be of adequate area to achieve a minimum 2.5 metre wide plant spacing; iii. the offset area/s must be contiguous with/adjacent to existing Preferred Koala Habitat; and iv. the offset area/s must not conflict with any existing or approved infrastructure; <p>c) details of proposed revegetation to meet the offset requirements;</p> <p>d) schedule of local native plant species to be used for planting;</p> <p>e) include weed treatment methods consistent with the SEQ Ecological Restoration Framework: Manual (Chenoweth EPLA & Bushland Restoration Services 2012) for weed control techniques for all environmental weeds;</p> <p>f) provide details of primary works and maintenance works as follows (yet may not be strictly limited to):</p> <ol style="list-style-type: none"> i. primary works - all planting, treatment of all environmental weeds, baseline monitoring and reporting; ii. maintenance works - supplementary planting (where required), continued treatment and control of environmental weeds, monitoring and reporting. <p>g) include a set of performance criteria to be met to achieve the specified restoration outcomes during primary works and minimum five year maintenance works phase as follows:</p> <ol style="list-style-type: none"> i. primary works phase: <ul style="list-style-type: none"> • 100% successful establishment of all planted stock; • 90% control of all environmental weeds species across the entire koala offset area/s; ii. maintenance works phase: <ul style="list-style-type: none"> • 90% successful establishment of all planted stock; • 90% control of all environmental weeds species across the entire across the entire koala offset area/s; • increased growth of all planted stock; <p>h) program of works to be undertaken;</p> <p>i) annual monitoring and reporting requirements;</p> <p>j) set of performance criteria to achieve site capture over a five (5) year management period.</p> <p>k) maintenance, monitoring and reporting schedule with developer commitment for a period of not less than five years; and an adaptive management statement detailing how potential problems arising may be overcome and requiring approval of Council's General Manager or delegate for such changes</p>			
D31	Prior to the commencement of operation or other timeframe agreed in writing by the Planning Secretary, the Koala offset primary works must be completed in accordance with the details set out in the Koala Offset Management Plan approved under condition D30.	-	-	Not Triggered
Signage				
D32	Prior to the commencement of operation, way-finding signage and signage identifying the location of staff car parking must be installed.	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
D33	Prior to the commencement of operation, bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas.	-	-	Not Triggered
Operational Waste Management Plan				
D34	<p>Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Certifier. The Waste Management Plan must:</p> <ul style="list-style-type: none"> a) detail the type and quantity of waste to be generated during operation of the development; b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); c) detail the materials to be reused or recycled, either on or off site; and d) include the Management and Mitigation Measures included in EIS. 	-	-	Not Triggered
Contamination				
D35	<p>If, based on further site investigations undertaken in accordance with condition B37, it is determined that remediation works are required to address the presence of contamination from organochloride pesticides, then prior to commencement of operation, the Applicant must submit a Validation Report for the development to the Certifier. The Validation Report must:</p> <ul style="list-style-type: none"> a) be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contact Assessment and Management (CPSS CSAM) scheme; b) be prepared in accordance with the relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997; c) include, but not be limited to: <ul style="list-style-type: none"> i. comment on the extent and nature of the remediation undertaken; ii. if material is to remain in-situ and capped, describe the location, nature and extent of any remaining contamination on site as well as any ongoing management requirements; iii. sampling and analysis plan and sampling methodology undertaken as part of the remediation; iv. if treated material is to remain on the subject site, results of sampling of treated material, compared with the treatment criteria in the most updated RAP; v. results of any validation sampling, compared to relevant guidelines/criteria; vi. comment on the suitability of the area for the intended land use; and d) be submitted to the Planning Secretary for information. 	-	-	Not Triggered
Landscaping				
D36	Prior to the commencement of operation or other timeframe agreed by the Planning Secretary, landscaping of the site must be completed in accordance with landscape plan(s) approved under condition B25.	-	-	Not Triggered
Vegetation Management Plan				
D37	<p>Prior to the commencement of operation, the Applicant must prepare a Vegetation Management Plan to manage the landscaping and vegetation on site and submit it to the Certifier. The plan must:</p> <ul style="list-style-type: none"> a) describe the ongoing monitoring and maintenance measures to manage landscaping and vegetation on the site; b) comply with the recommendations of the Bushfire Assessment Report prepared by Cool Burn Fire and Ecology dated 21 July 2021; and c) be consistent with the Applicant's Management and Mitigation Measures in the EIS. 	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<i>Note: The Vegetation Management Plan required by this condition is intended to achieve (in part) the purpose of the Landscape Plan of Management recommended in the Bushfire Assessment Report.</i>			
Evacuation and Emergency Planning				
D38	<p>Prior to the commencement of operation, a Bush Fire Emergency Management and Evacuation Plan must be prepared consistent with Development Planning – A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan.</p> <p><i>Note: A copy of the Bush Fire Emergency Management and Evacuation Plan should be provided to the Local Emergency Management Committee for its information prior to occupation of the development.</i></p>	-	-	Not Triggered
Operational Flood Emergency Management Plan				
D39	<p>Prior the commencement of the operation, a Flood Emergency Management Plan must be submitted to the Certifier that:</p> <ol style="list-style-type: none"> is be prepared by a suitably qualified and experienced person(s); addresses the provisions of the Floodplain Risk Management Guidelines (EESG); includes details of: <ol style="list-style-type: none"> the flood emergency responses for operational phase of the development; predicted flood levels; flood warning time and flood notification; assembly points and evacuation routes; evacuation and refuge protocols; and awareness training for employees and contractors, and visitors. 	-	-	Not Triggered
Noise Management Plan				
D40	<p>Prior to the commencement of operation, a Noise Management Plan is to be submitted to the Certified that details how noise from on site activities will be managed and controlled so as to prevent the generation or emission of intrusive noise. The Plan must be prepared in accordance with the recommendations of the Noise and Vibration Impact Assessment, dated 27 July 2021 and prepared by Acoustic Works. A copy of the Plan is to be provided to Council for information.</p>	-	-	Not Triggered
PART E POST OCCUPATION				
Out of Hours Event Management Plan				
E1	<p>Prior to the commencement of the first out of hours events (School Use) run by the school that involve 100 or more people, the Applicant is to prepare an Out of Hours Event Management Plan (School Use) in consultation with Council and submit it to the Council and Planning Secretary for information. The plan must include the following:</p> <ol style="list-style-type: none"> the number of attendees, time and duration; arrival and departure times and modes of transport; where relevant, a schedule of all annual events; measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport); details of the use of the site, where applicable, restricting use before 8am and after 10pm; measures to minimise localised traffic and parking impacts; and include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan. 	-	-	Not Triggered
E2	<p>The Out of Hours Event Management Plan (School Use) must be implemented by the Applicant for the duration of the identified events or use.</p>	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
E3	<p>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 for information. The plan must include the following:</p> <ul style="list-style-type: none"> a) the number of attendees, time and duration; b) arrival and departure times and modes of transport; c) where relevant, a schedule of all annual events; d) measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e. public transport); e) details of the use of the site, where applicable, restricting use before 8am and after 10pm; f) measures to minimise localised traffic and parking impacts; and g) measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan. 	-	-	Not Triggered
E4	The Out of Hours Event Management Plan (Community Use) must be implemented by the Applicant for the duration of the identified community event or use.	-	-	Not Triggered
Operation of Plant and Equipment				
E5	All plant and equipment used on site must be maintained in a proper and efficient condition operated in a proper and efficient manner.	-	-	Not Triggered
Warm Water Systems and Cooling Systems				
E6	The operation and maintenance of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 2 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires' Disease.	-	-	Not Triggered
Community Communication Strategy				
E7	The Community Communication Strategy, as submitted to the Certifier, must be implemented for a minimum of 12 months following the completion of construction.	-	-	Not Triggered
Deliveries to the Premises				
E8	All deliveries to the premises are to occur only within the hours of 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays unless otherwise approved by Planning Secretary.	-	-	Not Triggered
Servicing of Waste Facilities				
E9	The servicing of waste facilities must be limited to between the hours of 7am to 6pm Monday to Saturday and 8am to 6pm Sunday and Public Holidays unless otherwise approved by the Planning Secretary.	-	-	Not Triggered
Operational Noise Limits				
E10	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in the Noise and Vibration Impact Assessment, dated 27 July 2021 and prepared by Acoustic Works.	-	-	Not Triggered
E11	The Applicant must undertake 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 to the Planning Secretary within two months of commencement use of each stage of the development or other timeframe agreed to by the Planning Secretary to verify that operational noise levels do not exceed the recommended noise levels for	-	-	Not Triggered

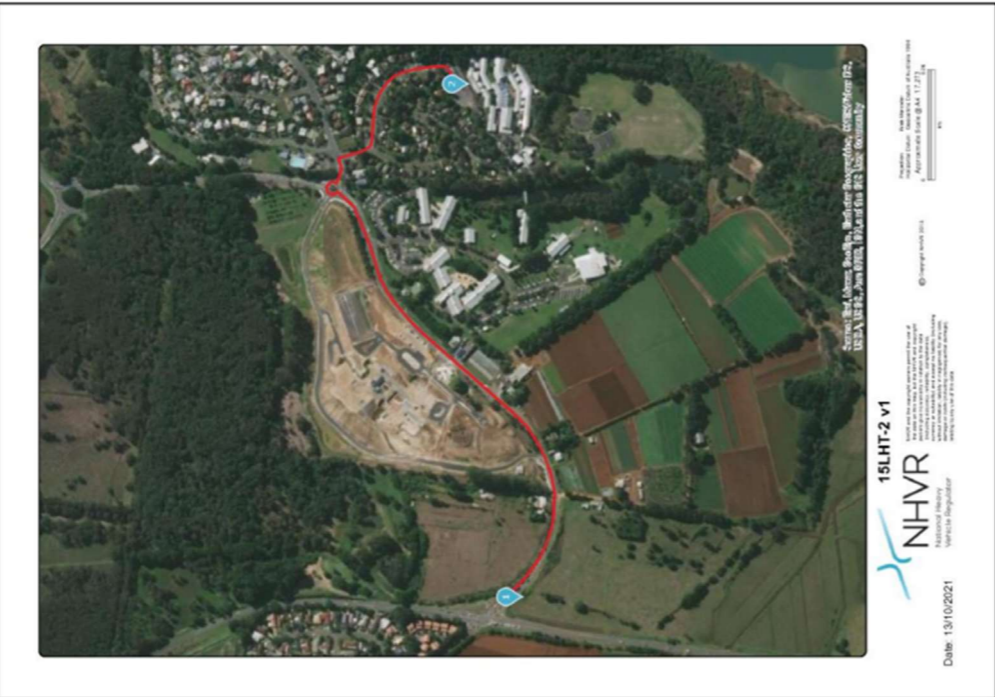
Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	mechanical plant identified in the Noise and Vibration Impact Assessment, dated 27 July 2021 and prepared by Acoustic Works. Should the noise monitoring program identify any exceedance of the recommended noise levels referred to above, the Applicant is required to implement appropriate noise attenuation measures so that operational noise levels do not exceed the recommended noise levels or provide attenuation measures at the affected noise sensitive receivers.			
Noise Management Plan				
E12	The development must be managed in accordance with the Noise Management Plan prepared under condition D40.	-	-	Not Triggered
Unobstructed Driveways and Parking Areas				
E13	All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises.	-	-	Not Triggered
School Transport Plan				
E14	The School Transport Plan required by condition D24 of this consent must be updated annually and implemented unless otherwise agreed by the Planning Secretary	-	-	Not Triggered
E15	The Complaints Handling Management Plan prepared under condition D25 must be implemented in perpetuity.	-	-	Not Triggered
Ecologically Sustainable Development				
E16	Unless otherwise agreed by the Planning Secretary, within six months of commencement of operation, Green Star certification must be obtained demonstrating the development achieves a minimum 4 star Green Star Design & As Built rating. If required to be obtained, evidence of the certification must be provided to the Certifier and the Planning Secretary. If an alternative certification process has been agreed to by the Planning Secretary under condition B11, evidence of compliance of implementation must be provided to the Planning Secretary and Certifier.	-	-	Not Triggered
Outdoor Lighting				
E17	Notwithstanding condition D6, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.	-	-	Not Triggered
Vegetation Management Plan				
E18	The Applicant must maintain the landscaping and vegetation on the site in accordance with the Vegetation Management Plan prepared under condition D36 for the duration of occupation of the development.	-	-	Not Triggered
Koala Offset Area Restriction				
E19	<p>Within six months or other timeframe agreed by the Planning Secretary of the commencement of operation, the Applicant must create and register a Positive Covenant and Restrictions As To User pursuant to Section 88B and Section 88BA of the Conveyancing Act 1919 which burden Part Lot 3 DP803772 and Part Lot 57 DP803814, benefits Tweed Shire Council and provides for the following:</p> <ul style="list-style-type: none"> a) a Positive Covenant over the area described as Koala Offset Area in the approved Koala Offset Management Plan approved under condition D30. This area must be subject to an approved ecological restoration program and managed for conservation purposes in perpetuity. b) restriction as to user regarding the Koala Offset Area in the approved Koala Offset Management Plan pursuant to conditions of this consent. The following activities are not permitted within this area. 	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> i. clearing, lopping or removal of any native plants, whether existing at the date of this consent or planted pursuant to conditions of this consent; ii. erection of any fixtures or improvements, including buildings or structures; iii. construction or maintenance of access roads and any services unless otherwise required by conditions of the subject development or established prior to issue of this consent; iv. depositing of any fill, soil, rock, rubbish, ashes, garbage, waste or other material foreign to the protected area; v. keeping or permitting the entry of domestic animals or any other animals that are not indigenous to the Koala Offset Area; and vi. performance of any other acts which may have detrimental impact on the values of the Koala Offset Area. The area must be managed in accordance with the approved Koala Offset Management Plan 			

APPENDIX B – CEMP & SUB-PLAN MITIGATION MEASURES

Unique ID	Requirement	Evidence collected	Independent Audit findings and recommendations	Conformance Status
Construction Environment Management Plan (CEMP) (Rev 3, 09/12/2021)				
Section 1.11.2	<p>Weekly and Post Rainfall Site Inspections</p> <p>The ESR will undertake weekly and post rainfall inspections of the work sites to evaluate the effectiveness of environmental controls. The ESR will record inspection findings on an inspection checklist form.</p> <p>If any maintenance and/or deficiencies in environmental controls or in the standard of environmental performance are observed, they will be recorded on the checklist form. Records will also include details of any maintenance required, the nature of the deficiency, any actions required and an implementation priority. Actions will be closed out in accordance with the identified priority and evidence of close out kept on file.</p>	<p>Inspection records provided from Hammertech system</p> <p>Interview with auditees, 07/03/2022</p>	<p>Construction commenced on 20/12/2021. Evidence was provided of one inspection being carried out during the month of January 2022 and one during February 2022. Evidence has been provided of weekly inspections being conducted in March 2022.</p> <p>No evidence of post-rainfall inspections provided, despite significant rainfall occurring over the past few months.</p> <p>The Project team noted that the frequency of inspections had been affected by the Christmas shutdown, COVID, and the recent flooding events.</p> <p>Non-conformance: Understanding that the ability to conduct weekly inspections has been limited by recent events, the auditor notes that there is no record of post-rainfall inspections being undertaken on the Project, despite numerous significant rainfall events occurring this year. This has been raised as a non-compliance against C9.</p>	Non-conformance
Section 1.7.1	<p>Induction</p> <p>All personnel (including sub-contractors) will attend a compulsory site induction that includes an environmental component prior to commencement on-site. This is done to ensure all personnel involved in the Project are aware of the requirements of the CEMP.</p> <p>Short-term visitors to site undertaking inspections / entering the site (such as regulators) will be required to undertake a visitors induction and be accompanied by inducted personnel at all times.</p> <p>Temporary visitors to site for purposes such as deliveries will be required to be accompanied by inducted personnel at all times.</p> <p>The construction ESR (or delegate) will conduct the environmental component of the site inductions.</p> <p>The environmental component must cover all elements of the CEMP and would include as a minimum:</p> <ul style="list-style-type: none"> • Relevant details of the CEMP including purpose and objectives • Requirements of due diligence and duty of care • Conditions of environmental licences, permits and approvals • Potential environmental emergencies on Site and the emergency response procedures • Reporting and notification requirements for pollution and other environmental incidents • High risk activities and associated environmental safeguards • Working in or near environmentally sensitive areas • Specific environmental management requirements and responsibilities • Mitigation measures for the control of environmental issues • Incident response and reporting requirements • Information relating to the location of environmental constraints. • Key environmental issues <p>A record of all environment inductions will be maintained and kept on-site. The construction ESR may authorise amendments to the induction at any time. Possible reasons for changes to the induction may be Project modifications, legislative changes or amendments to this CEMP or related documentation.</p> <p>An Induction Register is kept on site.</p>	<p>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p> <p>Workers Inducted Report, 01/06/2021 to 07/03/2022 (267 workers inducted for both Kingscliff High School and Kingscliff Public School projects)</p> <p>Kingscliff High School Driver Code of Conduct, Richard Crookes Construction</p> <p>Delivery driver induction checklist and sign off – hard copies kept onsite (photos provided by RCC)</p>	<p>The Site Induction includes high level information as per the CEMP. Record of Project personnel being inducted was provided (maintained in Hammertech system).</p> <p>NB. An observation has been raised against C4 in relation to updating the Site Induction to accurately reflect allowed hours of work.</p>	Compliant
Section 1.7.3	<p>Toolbox Talks</p>	<p>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p>	<p>The auditees advised that the Site Induction is currently the main process for raising environmental awareness on the Project, with targeted toolbox talks planned prior to specific work activities commencing in the future. It is</p>	Compliant

Unique ID	Requirement	Evidence collected	Independent Audit findings and recommendations	Conformance Status
	Targeted environmental awareness training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact. Topics covered may include those detailed above, or others deemed necessary in the lead up to or during construction.	Workers Inducted Report, 01/06/2021 to 07/03/2022 (267 workers inducted for both Kingscliff High School and Kingscliff Public School projects)	noted that construction is in the early stages and limited works have been carried out to date.	
Section 2.3.2	<p>Management of Dust and Odour – Mitigation Measures</p> <p>The following mitigation measures shall be adopted to reduce the impact on air quality and dust generation:</p> <ul style="list-style-type: none"> Construction vehicles and equipment to be suitably serviced prior to commencement of construction activities and all necessary maintenance to be undertaken during the construction period to meet EPA air quality requirements; Excessive use of vehicles and powered construction equipment will be minimised where possible; All construction machinery will be turned off when not in use to minimise emissions where possible; Construction contractors to monitor dust generation progressively; Dust suppression methods will be adopted where required (i.e. on windy days when earthworks and vehicle movements are generating dust); Examples of dust suppression methods include: <ul style="list-style-type: none"> Water carts; Application of soil binding polymers; Localized use of water to suppress excavation activities as they are occurring to suppress dust; Covering stockpiles; Any stockpiled spoil/fill will be protected to minimise dust generation and avoid sediment moving offsite; Vehicles transporting spoil from the site to be covered where required; and, The burning of waste materials will not be permitted on site. 	<p>Site inspection, 14/03/2022</p> <p>Equipment Induction – Excavator, Hammertech system output</p> <p>Complaints update, February 2022</p>	<p>No air quality issues were observed during the site inspection. The site is currently predominately covered with existing hardstand (asphalt).</p> <p>Ground investigation works (drilling of bore holes) were taking place at the time of the site inspection. The inspection took place post-rainfall and no dust management issues were observed.</p> <p>There were no trucks entering or leaving site at the time of inspection. Site access/egress points were stabilised and the adjacent public road was clean.</p> <p>The auditees provided example equipment induction records, which are recorded in the Hammertech system. Record includes initial plant induction checks, servicing requirements, and permits associated with the plant (e.g. excavation permits).</p> <p>See site photos in Appendix E.</p> <p>No complaints have been received on the Project to date.</p>	Compliant
Construction Traffic and Pedestrian Management Sub-plan (CTPMSP) (Rev 9, 01/03/2022)				
Section 9	<p>Recording and Monitoring</p> <p>Regular inspections of traffic control devices shall be carried out a minimum of three times daily and recorded in the Daily Traffic Management Checklist – a copy contained in the appendix. These records are available for inspection during the project. These recordings will be held on site by Lindores Personnel and submitted at the end of the shift to Richard Crookes Constructions works supervisor.</p>	<p>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 9, 01/03/2022</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>Observation: The auditees noted that the requirement to inspect traffic control devices a minimum of three times daily was meant to be specifically related to electronic traffic control devices (which have not yet been used on the Project). The auditees noted that Section 9 of the CTPMSP was going to be amended to correct this in the latest revision of the Plan, however this has not been rectified. This has been raised as an observation against C9.</p>	Not triggered
Section 12.12	<p>Road and Lane Closure/s</p> <p>This project will be undertaken in stages in order to minimize disruption to pedestrian and vehicular traffic in the vicinity of the works. Majority of works will be conducted within site boundaries. Limited Road/Lane closures may be required during the later stages with road and footway upgrades etc. Most site deliveries will be onsite and off the roadway, therefore lowering the impact on the local network. Heavy vehicles will utilize the heavy vehicle routes where possible to minimize regional road network impacts.</p>	<p>Site inspection, 14/03/2022</p> <p>Complaints update, February 2022</p>	<p>No road/lane closures were in place at the time of the site inspection. All works being undertaken were within the site boundary. Sighted site access/egress points for site deliveries, as well as materials laydown area onsite.</p> <p>See site photos in Appendix E.</p> <p>No complaints have been received on the Project to date.</p>	Compliant
Section 12.18	<p>Heavy Vehicle and Delivery Plant Haulage Route</p> <p>Primary haulage route for site plant deliveries as per current road network configuration. This network is set for upgrade as per future planning approvals and the exact entry points top site may be varied. All truck drivers will be provided with the specified route and will be asked to follow this route only. Richard Crookes will be responsible for monitoring the effectiveness of these measures. All vehicles will be notified to enter and leave the site in a forward direction unless in specific exceptional circumstances, under the supervision of accredited traffic controller(s). Trucks will also be discouraged to bring deliveries between 7:45am-9am and 2pm-3:45pm. Traffic control onsite will deter trucks who call up between these hours and have them wait off site away from local residential sites but in radio or telephone contact range.</p>	<p>Kingscliff High School Driver Code of Conduct, Richard Crookes Construction</p> <p>Delivery driver induction checklist and sign off – hard copies kept onsite (photos provided by RCC)</p>	<p>A Drive Code of Conduct has been prepared for the Project in line with B22, including the primary haulage route for site deliveries. Evidence provided by RCC shows that this Code of Conduct is being communicated with delivery drivers on the Project.</p>	Compliant

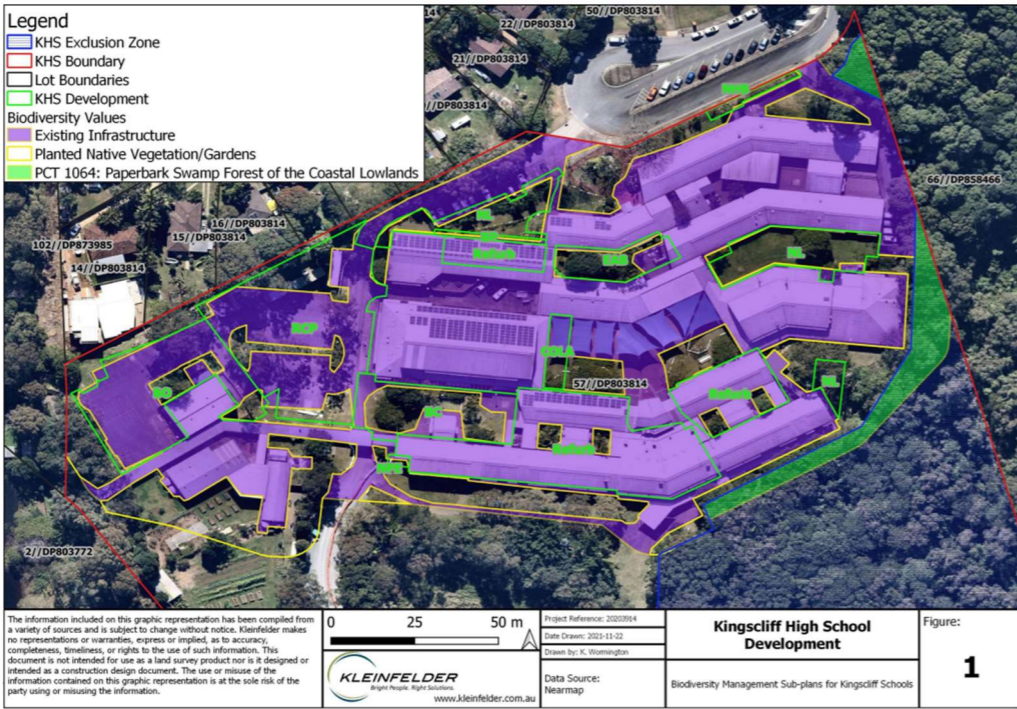
Unique ID	Requirement	Evidence collected	Independent Audit findings and recommendations	Conformance Status
				
Section 12.25	<p>Cyclists, Pedestrians and Public Transport – Traffic Network Safety</p> <p>Safe passage for cyclists and pedestrians will provided by Richard Crookes Constructions and Lindores Personnel traffic controllers and will utilize advance cautionary signage to inform of changed traffic conditions in advance of the works area on all frontages. These signs will include notification to the public of potential hazards within the construction area. Site signage may show the Workmen ahead sign and reduction in speed when entering the works area.</p> <p>During heavy vehicle access and egress, a VMS Board should be installed prior to the worksite on a suitable location approaching the site to notify private vehicle drivers and public transport providers of increased number of Heavy Vehicle movements.</p> <p>As well, to ensure that the children drop off vehicles are aware of changes to the network, the school shall notify all stakeholders via pamphlets or other suitable means of upcoming heavy vehicle movement. This will allow drivers to be aware that there will be an unusual volume of construction related traffic on certain dates.</p> <p>All pedestrian traffic and cyclists will be monitored as required. Appropriate pedestrian warning signage and directional signage will be placed and monitored throughout the project works. Where trip hazards exist or are identified "Pedestrian Watch Your Step" T8-1 shall be installed where appropriate space allows. At unmarked crossing points, a nominated suitably ticketed person, shall monitor the walking public. These individuals shall be clearly distinguishable (HIGH VIS) to allow for driver's visibility.</p> <p>Footpaths and cycleways will remain open as often as possible, to maintain a safe passage for all road users. It is foreseen for the footpath will be closed only during concrete pours, during these days of heavy vehicles access via the XVO, pedestrian traffic controllers will be utilized to ensure the safety of pedestrians on the verge. Plant operators shall be toolboxes on this during inductions to site. This must occur prior to operators being authorized access to site.</p>	<p>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p> <p>Kingscliff High School Project Update, December 2021, SINSW</p> <p>Complaints update, February 2022</p> <p>Site inspection, 14/03/2022</p>	<p>Sighted signage installed warning pedestrians to watch their step due to closed footpath.</p> <p>Traffic controller was on site at the time of inspection manning the school access gate, which is used for access to the construction site as well as the staff car park.</p> <p>No construction traffic observed during the site inspection, which took place at morning peak school time.</p> <p>See site photos in Appendix E.</p> <p>No complaints have been received on the Project to date.</p>	Compliant

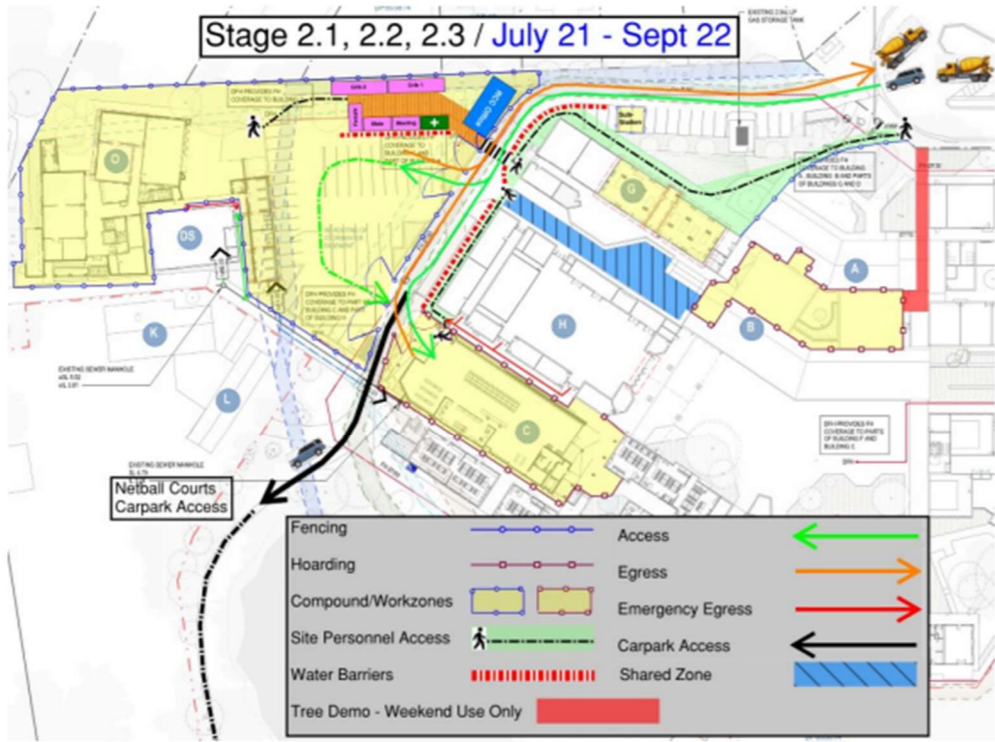
Unique ID	Requirement	Evidence collected	Independent Audit findings and recommendations	Conformance Status				
Construction Noise and Vibration Management Sub-plan (CNVMSP) (Rev 4, 09/12/2021)								
Section 7, Table 7-1	<p>Noise and vibration management and mitigation measures – NV11</p> <table border="1"> <tr> <td>NV11</td> <td> <p>A site-specific induction will be provided to all site personnel, contractors, sub-contractors with an emphasis on understanding and managing noise impacts from the work activities being undertaken.</p> <p>The induction will include:</p> <ul style="list-style-type: none"> All relevant project specific and standard noise and vibration measures Relevant licence and approval conditions Approved work hours as per Condition C4 Restriction on construction vehicles arrival to site and surrounding residential precincts to within the working hours as per Condition C4 Location of nearest sensitive receivers No high noise generating activities Construction employee parking areas Designated loading and unloading areas/ and procedures Environmental incident procedures </td> <td></td> <td>Ongoing</td> </tr> </table>	NV11	<p>A site-specific induction will be provided to all site personnel, contractors, sub-contractors with an emphasis on understanding and managing noise impacts from the work activities being undertaken.</p> <p>The induction will include:</p> <ul style="list-style-type: none"> All relevant project specific and standard noise and vibration measures Relevant licence and approval conditions Approved work hours as per Condition C4 Restriction on construction vehicles arrival to site and surrounding residential precincts to within the working hours as per Condition C4 Location of nearest sensitive receivers No high noise generating activities Construction employee parking areas Designated loading and unloading areas/ and procedures Environmental incident procedures 		Ongoing	<p>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p> <p>Workers Inducted Report, 01/06/2021 to 07/03/2022 (267 workers inducted for both Kingscliff High School and Kingscliff Public School projects)</p>	<p>The Site Induction includes high level information as per the NV11. Record of Project personnel being inducted was provided (maintained in Hammertech system).</p> <p>NB. An observation has been raised against C4 in relation to updating the Site Induction to accurately reflect approved hours of work.</p>	Compliant
NV11	<p>A site-specific induction will be provided to all site personnel, contractors, sub-contractors with an emphasis on understanding and managing noise impacts from the work activities being undertaken.</p> <p>The induction will include:</p> <ul style="list-style-type: none"> All relevant project specific and standard noise and vibration measures Relevant licence and approval conditions Approved work hours as per Condition C4 Restriction on construction vehicles arrival to site and surrounding residential precincts to within the working hours as per Condition C4 Location of nearest sensitive receivers No high noise generating activities Construction employee parking areas Designated loading and unloading areas/ and procedures Environmental incident procedures 		Ongoing					
Section 7, Table 7-1	<p>Noise and vibration management and mitigation measures – NV19</p> <table border="1"> <tr> <td>NV19</td> <td> <p>If further noise mitigation is required, acoustic barriers around the perimeter of the site can be installed during the work. If further noise reductions are required, install additional screening around noise sensitive areas.</p> </td> <td>Installation of temporary attenuation as required.</td> <td>Prior to the commencement of Construction Activities</td> </tr> </table>	NV19	<p>If further noise mitigation is required, acoustic barriers around the perimeter of the site can be installed during the work. If further noise reductions are required, install additional screening around noise sensitive areas.</p>	Installation of temporary attenuation as required.	Prior to the commencement of Construction Activities	<p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>Further noise mitigation, such as acoustic barriers, has not been required to date, as construction is in the early stages. The auditees advised that the need for additional noise mitigation will be considered for future noisy work in proximity to adjacent residents on Cambridge Court (next to Building O site)</p>	Not triggered
NV19	<p>If further noise mitigation is required, acoustic barriers around the perimeter of the site can be installed during the work. If further noise reductions are required, install additional screening around noise sensitive areas.</p>	Installation of temporary attenuation as required.	Prior to the commencement of Construction Activities					
Section 7, Table 7-1	<p>Noise and vibration management and mitigation measures – NV20</p> <table border="1"> <tr> <td>NV20</td> <td> <p>Community consultation will be required with nearby residences during demolition and construction activities that are likely to exceed noise limits.</p> <p>The Responsible Person should notify the adjacent residential premises of the intention to commence work that may cause adverse impacts on surrounding residents. If plant is to be operated close proximity to residential premises, the Responsible Person should advise the occupants of the premises the length and time that the plant will be in operation proximate to the property boundary.</p> <p>Demolition and construction works are predicted to comply with the highly noise affected noise affected limit of 75 dB(A) LAeq 15min at all residential receiver locations and the criteria for receiver 3 and 4 without the need for any additional acoustic treatments.</p> </td> <td>Development of a Community Communication Strategy</td> <td>Prior to the commencement of Construction Activities</td> </tr> </table>	NV20	<p>Community consultation will be required with nearby residences during demolition and construction activities that are likely to exceed noise limits.</p> <p>The Responsible Person should notify the adjacent residential premises of the intention to commence work that may cause adverse impacts on surrounding residents. If plant is to be operated close proximity to residential premises, the Responsible Person should advise the occupants of the premises the length and time that the plant will be in operation proximate to the property boundary.</p> <p>Demolition and construction works are predicted to comply with the highly noise affected noise affected limit of 75 dB(A) LAeq 15min at all residential receiver locations and the criteria for receiver 3 and 4 without the need for any additional acoustic treatments.</p>	Development of a Community Communication Strategy	Prior to the commencement of Construction Activities	<p>Interview with auditees, 07/03/2022</p> <p>Kingscliff High School Project Update, December 2021, SINSW</p> <p>Complaints update, February 2022</p> <p>Site inspection, 14/03/2022</p>	<p>The Project has not commenced demolition or construction activities likely to exceed noise limits. Construction is in the early stages and limited works have been carried out to date.</p> <p>No complaints have been received on the Project to date.</p>	Not triggered
NV20	<p>Community consultation will be required with nearby residences during demolition and construction activities that are likely to exceed noise limits.</p> <p>The Responsible Person should notify the adjacent residential premises of the intention to commence work that may cause adverse impacts on surrounding residents. If plant is to be operated close proximity to residential premises, the Responsible Person should advise the occupants of the premises the length and time that the plant will be in operation proximate to the property boundary.</p> <p>Demolition and construction works are predicted to comply with the highly noise affected noise affected limit of 75 dB(A) LAeq 15min at all residential receiver locations and the criteria for receiver 3 and 4 without the need for any additional acoustic treatments.</p>	Development of a Community Communication Strategy	Prior to the commencement of Construction Activities					
Section 8.3	<p>Inspection and Monitoring</p> <p>Noise and vibration monitoring will be undertaken throughout the construction phase of the Project to verify the predicted noise and vibration impacts. This will assist in identifying impacts to sensitive receivers, quantifying and reporting compliance, determining if mitigation measures are effective and if any further mitigation measures are required to reduce and manage noise and vibration impacts.</p> <p>The policy and procedures for Noise and Construction Vibration monitoring are set out in section 12.3 and 12.4 of the Noise and Vibration Impact Assessment (Acoustic Works, 2021).</p> <p>An excerpt (Sections 12.3 and 12.4) of the Acoustic Works report is provided as Appendix B.</p>	<p>Interview with auditees, 07/03/2022</p>	<p>No noise monitoring has been required to be conducted to date.</p>	Not triggered				

Unique ID	Requirement	Evidence collected	Independent Audit findings and recommendations	Conformance Status
Construction Waste Management Sub-plan (CWMSP) (Rev 2, 09/12/2021)				
Section 5.1.1	<p>Reuse and recycling</p> <p>Waste avoidance will be prioritised during the construction phase of the Project in accordance with the waste management hierarchy.</p> <p>Wherever possible, waste will be separated and segregated on-site to facilitate reuse and recycling. Waste materials, including excavated soil and construction waste, will be separated onsite into dedicated bins/areas for either reuse onsite or collection by a waste contractor and transport to offsite facilities.</p> <p>Richard Crookes Constructions will make sure that all necessary planning is undertaken, and site activities coordinated, to avoid spoilage of materials and excessive generation of waste.</p>	<p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>Segregated waste bins observed on site for recyclable and non-recyclable waste. See site photos in Appendix E.</p> <p>Limited waste has been generated to date as construction is in the early stages.</p>	Compliant
Section 5.1.2	<p>Waste handling and storage</p> <p>Where waste is required to be handled and stored onsite prior to onsite reuse or offsite reuse/recycling/disposal, the following measures apply:</p> <ul style="list-style-type: none"> • During demolition, the site would be secured with safety fencing and demolition waste would initially be placed in waste streams in designated skip bins for transport to the resource recovery centre. Skip bins would be provided for: <ul style="list-style-type: none"> ○ Concrete, bricks and tiles ○ Co – mingled waste ○ General waste • Any other excavated material (e.g. soil and rock) is to be stored in designated stockpile areas and mitigation measures outlined the Soil and Water Management Sub Plan where: <ul style="list-style-type: none"> ○ Stockpiles must be located at least 5 m from likely areas of concentrated water flows, and more than 10 m from a any waterway; ○ Stockpile heights shall not exceed 4 m, and slopes shall be no steeper than 2:1; ○ Adequate sediment control measures must be installed prior to stockpiling material; and ○ Stockpiles that will be in place for more than 20 days, or which are susceptible to wind or water erosion, shall be covered or otherwise protected from erosion, within 10 days of forming each stockpile. • Any liquid wastes are to be stored in appropriate containers in bunded areas until transported offsite. Bunded areas will have the capacity to hold 110 per cent of the liquid waste volume for bulk storage or 120 per cent of the volume of the largest container for smaller packaged storage. No liquid waste is expected. • Any hazardous waste will be managed by appropriately qualified and licensed contractors, in accordance with the requirements of the <i>Environmentally Hazardous Chemicals Act 1985</i> and the EPA waste disposal guidelines. No hazardous waste is expected. <p>All other recyclable or non-recyclable wastes are to be stored in appropriate covered receptacles (e.g. bins or skips) in appropriate locations onsite and contractors commissioned to regularly remove/empty the bins to approved disposal or recycling facilities.</p>	<p>Complaints update, February 2022</p> <p>Site inspection, 14/03/2022</p>	<p>Bins were available onsite for construction waste (skip bin), metal recycling (skip bin), general waste (covered bin), and cardboard recycling (covered bin). These bins were stored in the secured site compound area, which is fenced and locked.</p> <p>Several construction waste skip bins were available on site, and bins were not overflowing or overdue for servicing.</p> <p>No excavated material was stockpiled on site.</p> <p>No liquid or hazardous waste was being stored on site.</p> <p>See site photos in Appendix E.</p>	Compliant
Section 5.1.3	<p>Waste disposal</p> <p>Waste (and sediment) disposal is to be undertaken in accordance with the <i>Protection of the Environment Operations Act 1997</i> and the <i>Waste Avoidance and Resource Recovery Act 2001</i>. Wastes that are unable to be reused or recycled will be disposed of offsite to an appropriately licenced waste management facility following classification (refer to section 5.2). Details of waste types, volumes and destinations are to be recorded in the Waste Management Register (Appendix A).</p>	<p>Waste Management Tracking, last entry 28/01/2022</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>All waste removed from site to date has been pre-classified as construction and demolition waste under the <i>Waste Classification Guidelines Part 1: Classifying Waste</i> (EPA, 2014).</p> <p>Project Waste Management Tracking provided, which includes one entry for 71 tonnes of concrete waste removed by Bosh Bins to JGI Oxenford. The auditees advised that this concrete waste was generated as part of the COLA construction.</p> <p>The auditees noted some difficulties in obtaining waste tracking information from the waste contractor and are in</p>	Compliant

Unique ID	Requirement	Evidence collected	Independent Audit findings and recommendations	Conformance Status
			the process of addressing this before construction activities increase onsite.	
Construction Soil and Water Management Sub-plan (CSWMSP) (Rev 3, 09/12/2021)				
Section 6.1.2.1	<p>Erosion and Sediment Control</p> <p>Sediment control measures (e.g. sediment fencing, silt curtain, mesh or gravel "sausage") must be installed prior to any construction activities commencing to prevent sediment and any other material (e.g. concrete, grout) moving off-site and entering any water course, drainage line or drain inlets. Dirty water or foreign material must not be released into drainage lines and/or waterways.</p> <p>Erosion and sedimentation controls are to be checked weekly and maintained as required (including clearing of sediment from behind barriers). Records of inspections and maintenance works undertaken are to be kept on-site and provided on request.</p>	<p>Construction Soil and Water Management Sub-Plan – Kingscliff High School Upgrade: Appendix A 'ESCP Drawing', Richard Crookes Constructions, Rev 3, 09/12/2021</p> <p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Complaints update, February 2022</p> <p>Site inspection, 14/03/2022</p>	<p>Erosion and sediment controls in place onsite largely aligned with the Project's Erosion and Sediment Control Plan.</p> <p>Significant rain had fallen in the period leading up to the site inspection (causing widespread flooding in the Northern Rivers region), including up to the night before. Despite this, controls onsite were observed to be working effectively.</p> <p>There has been minimal ground disturbance to date, with the majority of the site still covered by hardstand.</p> <p>See site photos in Appendix E.</p> <p>No complaints have been received on the Project to date.</p> <p>Observation: The version of the site ERSD plan observed at the time of the audit did not fully reflect the controls in place onsite, showing use of a rumble grid at site entrance and instead of the gabion rumble grid that has been installed at the compound egress gate. This has been raised as an observation against C9.</p>	Compliant
Section 6.1.2.2	<p>Vehicle Access</p> <p>The site access point shall be stabilised, and fencing (e.g. sediment fence or barrier) used to restrict all vehicular movements to that point. Any temporary access points shall be constructed in accordance with Figure 2 Standard Drawing SD 6-14, Appendix A. Stabilised access points with rumble grids or wheel washes to prevent mud tracking on roads will be established. Longer term and/or heavily used haul roads will generally be sealed. Sealed haul roads will be regularly cleaned.</p>	<p>Construction Soil and Water Management Sub-Plan – Kingscliff High School Upgrade: Appendix A 'ESCP Drawing', Richard Crookes Constructions, Rev 3, 09/12/2021</p> <p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Complaints update, February 2022</p> <p>Site inspection, 14/03/2022</p>	<p>Site access and egress points are stabilised and were observed to be free from mud tracking during the site inspection.</p> <p>See site photos in Appendix E.</p> <p>No complaints have been received on the Project to date.</p> <p>NB. See observation against Section 6.1.2.1, above, regarding update required to the ESCP to reflect change from rumble grid at site entrance to gabion rumble grid at compound egress gate.</p>	Compliant
Section 6.1.2.4	<p>Stockpile Management</p> <p>The following stockpile management measures shall be applied:</p> <ul style="list-style-type: none"> • Stockpiles must be located at least 5 m from likely areas of concentrated water flows, and more than 10 m from any waterway. • Stockpile heights shall not exceed 4 m, and slopes shall not be steeper than 2:1. • Adequate sediment control measures must be installed prior to stockpiling material. • Stockpiles that will be in place for more than 20 days, or which are susceptible to wind or water erosion, shall be covered or otherwise protected from erosion, within 10 days of forming each stockpile. 	<p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>No stockpiling of material was being undertaken onsite at the time of inspection.</p>	Not triggered
Section 6.2	<p>Water quality monitoring program</p>	<p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>Observation: There appears to be a misunderstanding around base line surface water monitoring and its applicability to the Project. There is no evidence of base line monitoring being conducted as per the CWSMP and the auditor observes that there have been no discharges on the Project to date. The auditor recommends reviewing</p>	Not triggered

Unique ID	Requirement	Evidence collected	Independent Audit findings and recommendations	Conformance Status
	<p>Water quality monitoring will take place for all dewatering works in accordance with the ANZG water quality guidelines. Baseline monitoring is required for any surface water discharge off site as per the POEO Act 1997. Where practicable any water collected in excavations / site works will be used within the premises (e.g. dust suppression, watering retained vegetation).</p> <p>For reuse of water onsite, the following criteria must be met:</p> <ul style="list-style-type: none"> • pH – 6.5 to 8.5 • No visible oil and grease • No potential for water to leave the premises • No surface runoff will be generated from the reuse (reuse includes dust suppression, watering retained vegetation etc.) • No potential for water to reach any watercourse 		<p>this commitment given that construction has commenced and that the window to conduct base line monitoring has now passed. This has been raised as an observation against C9.</p>	
Section 6.4	<p>Spill prevention and response</p> <p>The following control measures shall be implemented to minimise the risk of pollution caused by accidental leaks or spills:</p> <ul style="list-style-type: none"> • No vehicle wash-down shall occur on-site. • The lowest volume of hydrocarbons (oil, grease, petrol and diesel) practicable will be stored on-site. • Chemical storage areas will be bunded and chemicals will be stored in accordance with the products Safety Data Sheet (SDS). All fuels, chemicals and hazardous liquids must be stored away from drainage lines, within an impervious bunded area, and not on slopes steeper than 1:10. • Refuelling and maintenance of vehicles, plant, and equipment shall not be undertaken at any location which drains directly to waters without appropriate temporary bunding being provided. Refuelling operations must not be left unattended. • An emergency spill kit is to be kept on site at all times and maintained throughout the construction work. The spill kit must be appropriately sized for the volume of substances at the work site. • Any leaks or spills must be managed and cleaned up in accordance with RCC's Spill Response Procedure. • All construction equipment must be inspected by qualified personnel prior to the commencement of work to reduce the risk of hydrocarbon spills or leaks. • Vehicles and plant must be properly maintained and regularly inspected for fluid leaks. • Portable toilets must be positioned securely within approved compound areas and emptied on a regular basis using a licensed service provider and human waste disposed of to a local sewerage treatment plant. 	<p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>Bunded storage locker for hazardous materials and spill kit were observed onsite during the site inspection. The auditees advised that there is no refuelling being undertaken onsite at this stage. Limited plant and equipment are being used on site as the Project is in the early stages of construction.</p> <p>The current spill kit being used is a small portable spill kit. The Project team advised of plans to obtain a larger wheelie bin spill kit with more plant will be active onsite.</p> <p>See site photos in Appendix E.</p>	Compliant
Biodiversity Management Sub-plan (BMSP) (Rev 2.0, 09/12/2021)				
Section 3.2, Table 2	<p>Generic Safeguards for Vegetation and Fauna Prior to Construction – No. 1</p> <p>Clearing limits will be clearly marked and all site personnel made aware of Exclusion Zones (Figure 1).</p>	<p>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p> <p>Workers Inducted Report, 01/06/2021 to 07/03/2022 (267 workers inducted for both Kingscliff High School and Kingscliff Public School projects)</p> <p>Site inspection, 14/03/2022</p>	<p>The site is fenced and the Project has sign posted environmental protection zones. See site photos in Appendix E.</p> <p>Exclusion zones are included in the Site Induction presentation.</p>	Compliant

Unique ID	Requirement	Evidence collected	Independent Audit findings and recommendations	Conformance Status
				
Section 3.2, Table 2	<p>Generic Safeguards for Vegetation and Fauna Prior to Construction – No. 6</p> <p>Trees to be retained shall be clearly identified for preservation and temporarily protected by "paraweb" fencing placed not less than 3 metres clear of trees where possible, as some retained trees may be less than 3 metres from new and refurbished buildings. There will be no stockpiling or parking of plant/machinery 3 metres from this area.</p>	<p>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>The site is fenced and the Project has sign posted environmental protection zones (see site photos in Appendix E).</p> <p>Trees being retained have been fenced with ATF and sign posted to protect them during construction works (see site photos in Appendix E).</p> <p>While paraweb fencing has not been used, the use of ATF provides a stronger barrier for the protection of retained trees.</p>	Compliant
Section 3.2, Table 2	<p>Generic Safeguards for Vegetation and Fauna Prior to Construction – No. 11</p> <p>Contact shall be made with a trained wildlife handler / ecologist least 2 weeks prior to the commencement of clearing operations to allow them to prepare for the clearing and construction period.</p>	<p>Pre-clearing report ecologist inspection of trees approved for removal, Kingscliff High School development project, Arbor Ecological, dated 11/03/2022</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>The Project has engaged Arbor Ecological to conducted pre-clearing inspections prior to undertaking vegetation clearing on site. Pre-clearing inspection undertaken on 24/02/2021, as documented in report provided.</p>	Compliant
Section 3.2, Table 6	<p>Additional Environmental Safeguards for Vegetation taken from the Bush Stone-curlew Management Plan – No. 6 (During Construction)</p> <p>All employees, contractors and sub-contractors working on the site will undergo site induction training and should be made aware of all matters regarding fauna management, particularly in relation to Bush Stone-curlew. All site personnel are to be made aware of the location of the nest or roosting areas (if present), the extent of the exclusion zones and when the exclusion zones are in force.</p>	<p>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p> <p>Bush Stone-curlew Management Plan, Kleinfelder Australia Pty Ltd, Version 2.0, 30/07/2021</p> <p>Site inspection, 14/03/2022</p>	<p>The Bush Stone-curlew Management Plan includes the following note:</p> <p><i>“At Kingscliff High School, they would potentially use the school grounds and surrounding vegetation.”</i></p> <p>Observation: The Project Site Induction includes a map detailing environmental exclusion zones; however, it does not specifically reference the Bush Stone-curlew and its potential to nest or roost within the and around the school. All Project personnel should be made aware of the potential for this species to occur within the work area and what to do if found onsite. This has been raised as an observation against C9.</p>	Compliant

Unique ID	Requirement	Evidence collected	Independent Audit findings and recommendations	Conformance Status
Section 3.3, Table 7	<p>Generic Safeguards for Weed Management prior to Construction – No. 1</p> <p>Weed survey to be undertaken by suitably qualified and experienced persons prior to commencement of any construction activities, including site inspections and survey. The consultant is to advise on best practice weed management techniques.</p>	<p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>Observation: The Project is required to conduct weed survey prior to commencement of any construction activities. The auditees advised that weed management is being undertaken by a land maintenance contractor (Justin Barlow Gardening Services). It is not clear whether weed survey and management has been conducted by a suitably qualified and experienced person, as required under the BMSF. This has been raised as an observation against C9.</p>	Compliant
Flood Emergency Response Sub-plan (FERSP) (Rev 2, 02/12/2021)				
Section 3.2.1	<p>Stage 1</p> <p>The first stage will involve demolition, construction of the library, extension of the administration building, construction of the CAPA building, construction of the COLA and external works.</p> <p>The site layout during this stage is shown in Figure 2. Several work zones will be established, the largest of which is to the west of the driveway through the school and will contain the site office and other sheds. There will also be four smaller work zones established to the east of the access driveway.</p> <p>Vehicular access will be maintained along the driveway from Oxford St to the netball courts south-west of the main school buildings. Pedestrian access between Oxford St and the rear of the school will be maintained via various routes between the school buildings east of the driveway.</p>  <p>Figure 2: Site layout during Stage 1 (Richard Crookes Constructions, 2021)</p>	<p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	<p>Works observed on site, including site access arrangements, aligned with the site layout drawing and description for Stage 1.</p>	Compliant

Unique ID	Requirement	Evidence collected	Independent Audit findings and recommendations	Conformance Status
Section 6.1.1	<p>What to Do in a Flood Emergency – Before a Flood</p> <p>Trigger for action: Always</p> <p><u>Actions</u></p> <ul style="list-style-type: none"> • Actions from Section 4.3 of this report will be included in the WHS site induction. 	Interview with auditees, 07/03/2022	<p>Observation: The first step in the Flood Emergency Response Plan in section 6 of the FERP includes the following action: “Actions from Section 4.3 of this report will be included in the WHS site induction.” The auditor noted that section 4.3 of the report (FERP) is a brief section on site flooding and does not include any actions. This has been raised as an observation against C9.</p> <p>It is noted that the Site induction includes content around emergency and evacuation procedures.</p>	Compliant
Section 6.1.2	<p>What to Do in a Flood Emergency – Heavy rainfall is forecast</p> <p>Trigger for action: Heavy rainfall is forecast</p> <p><u>Actions</u></p> <ul style="list-style-type: none"> • There is low probability of construction work areas, plant or materials being damaged by flooding. Therefore, there are no special actions required for their protection. • The site supervisor should remind staff of the flood evacuation routes and assembly points 	<p>Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, 07/03/2022</p> <p>Interview with auditees, 07/03/2022</p> <p>Site inspection, 14/03/2022</p>	Discussed as part of Site Induction and prestart meetings.	Compliant

APPENDIX C – PLANNING SECRETARY AGREEMENT OF INDEPENDENT AUDITORS



**Planning,
Industry &
Environment**

Ms Kendal Caynes
Senior Compliance Planning Officer
Schools Infrastructure NSW
Level 10, 259 George Street
SYDNEY NSW 2000

01/12/2021

Dear Ms Caynes

**Upgrades to Kingscliff High School (SSD-8744305)
Request for Auditor Approval IEA**

The Department has received your request (SSD-8744305-PA-1) for the Secretary's approval of suitably qualified Auditor/s to prepare the IEA for the upgrade to Kingscliff High School.

The Department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment of Wolfpeak Pty Ltd to prepare the Independent Environmental Audit.

In accordance with Condition C36 of SSD-8744305 (the 'Consent') and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team:

- Mr Nicholas Ballard;
- Derek Low;
- Steve Fermio; and
- Ann Azzopardi

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you wish to discuss the matter further, please contact Phillip Rose on (02) 6670 8657.

Yours sincerely

4 Parramatta Square, 12 Darcy Street, Parramatta 2150 | dpi.nsw.gov.au | 1



Shelley McPhee
Compliance Team Leader
Compliance
As nominee of the Planning Secretary

APPENDIX D – CONSULTATION RECORDS

Ann Azzopardi

From: Ann Azzopardi
Sent: Friday, 4 March 2022 4:36 PM
To: 'shelley.mcphee@planning.nsw.gov.au'; 'compliance@planning.nsw.gov.au'
Cc: Derek Low; Steve Fermio; 'laura.goodall@mbbgroup.com.au'
Subject: RE: Kingscliff High School - SSD-8744305 - Independent Audit No. 1

Hi Shelley,

Thanks for your time on the phone on Wednesday.

As discussed, we've made the decision to postpone the site inspection component of the upcoming Independent Audit for Kingscliff High School upgrades (SSD 8744305) from this coming Monday, 7 March 2022 to the following Monday, 14 March 2022 (pending weather constraints). As construction commenced on 20/12/2021, the site inspection is technically due to be undertaken by 14/03/2022, so we may still scrape within the required timeframe.

We'll also be proceeding with a desktop audit via Teams this coming Monday, 7 March, to keep things moving.

Please let me know if you have any further queries about this.

Kind regards,

Ann

Ann Azzopardi
Principal Sustainability Consultant



E: aazzopardi@wolfpeak.com.au
M: 0427 151 631 P: 1800 979 716
A: Suite 2, Level 10, 82 Elizabeth St, Sydney NSW 2000
www.wolfpeak.com.au

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From: Ann Azzopardi
Sent: Wednesday, 16 February 2022 8:30 AM
To: compliance@planning.nsw.gov.au
Cc: Derek Low <dlow@wolfpeak.com.au>; Steve Fermio <sfermio@wolfpeak.com.au>;
'laura.goodall@mbbgroup.com.au' <laura.goodall@mbbgroup.com.au>
Subject: Kingscliff High School - SSD-8744305 - Independent Audit No. 1

Good morning,

I am one of the Department of Planning and Environment (the Department) approved independent auditors on the Kingscliff High School SSD-8744305 (the Project).

I am currently preparing to undertake the first independent audit of the Project. The audit is required to be conducted in accordance with SSD-8744305 conditions C36 to C41, and the Department's 2020 *Independent Audits Post Approval Requirements* (or IAPAR).

The Approval is available at the following link: <https://www.planningportal.nsw.gov.au/major-projects/project/39476>

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>

The on-site component of the audit is scheduled to occur on 7 March 2022, with the report to be submitted to the Department two months afterwards. The audit pertains to post-approval requirements and compliance.

In accordance with Section 3.2 of the IAPAR, I am consulting with the Department on the scope of the audit and for confirmation as to whether other parties or agencies are to be consulted.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant condition along with all post approval documents prepared to satisfy the conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request the Department confirm:

- If it has any key issues it would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR, or
- If it recommends that other parties or agencies are to be consulted. If so I request that the Department identify those parties.

I also invite the Department to join WolfPeak (and the Project team and any other parties or agencies) to a meeting to discuss the audit scope. If this is something the Department is interested in, please let me know the preferred dates / times, and I can send out invitations.

Please let me know if you have any questions. I look forward to hearing from you.

Kind regards,

Ann Azzopardi
Principal Sustainability Consultant



E: aazzopardi@wolfpeak.com.au

M: 0427 151 631 P: 1800 979 716



A: Suite 2, Level 10, 82 Elizabeth St, Sydney NSW 2000

www.wolfpeak.com.au



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APPENDIX E – SITE INSPECTION PHOTOGRAPHS



No.	Comment	Photograph
1	Site notice displayed at the entry point to the construction site on Oxford Street (in line with C1)	
2	Construction waste skip bin onsite	

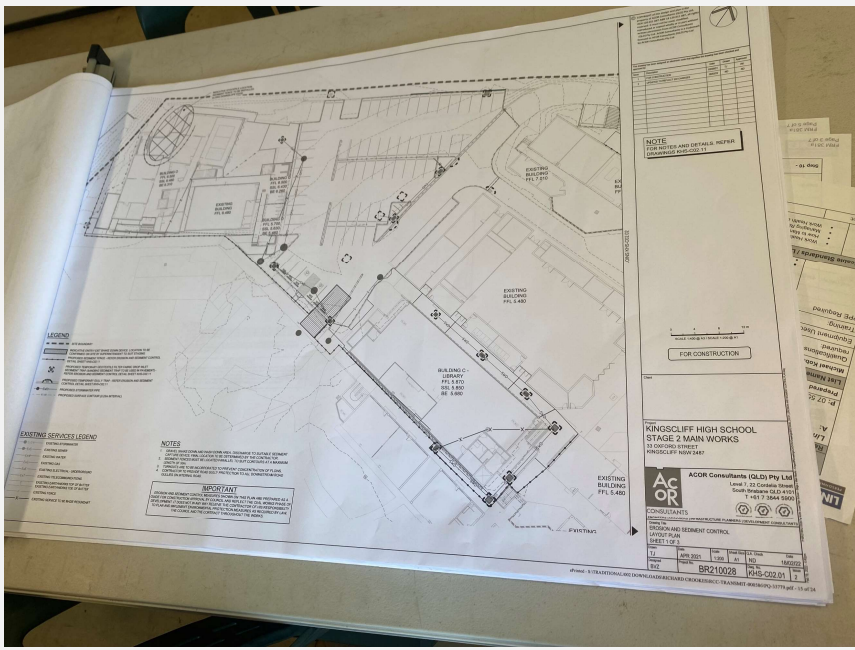

No.	Comment	Photograph
3	Site office waste storage bins onsite, including cardboard only bin	
4	Tree to be retained protected with ATF	

No.	Comment	Photograph
5	COLA structure recently installed	
6	Signage installed to advise pedestrians of changed access	

No.	Comment	Photograph
7	Signage installed to advise workers not to use informal path through the adjacent Council land to Cudgen Foreshore Park (B23)	
8	Coir log used for erosion and sediment control in area recently disturbed by utility works	

No.	Comment	Photograph
9	Site entry gate with shade cloth installed on ATF	
10	Erosion and sediment controls installed to protect live drain on site	

No.	Comment	Photograph
11	Bunded storage cupboard for fuel and other hazardous substances	 <p>The photograph shows a yellow bunded storage cupboard (BSC) located inside a storage container. The cupboard has a red 'DANGER' label with a flame symbol and the text 'FLAMMABLE LIQUID 3' and 'NO SMOKING NO IGNITION SOURCES WITHIN 3M'. Below the label, it says 'MAX CAPACITY 100 LITRES'. The cupboard is on a wooden pallet. To the left, there is a white bucket and some orange safety equipment. Above the cupboard, there are some items on a shelf, including a red and yellow striped bag.</p>
12	Spill kit stored in container near site compound area	 <p>The photograph shows a spill kit and a white sprayer bottle on a wooden shelf inside a storage container. The spill kit is a yellow bag with a green label that reads 'SORBEX SPILL RESPONSE KIT' and 'FOR REFILLS CALL: 1300 885 381'. The sprayer bottle is white with a black handle and a blue label. There are other items on the shelf, including a blue container and some red safety equipment.</p>

No.	Comment	Photograph
13	Current erosion and sediment control plan for the Project	 <p>The photograph shows a detailed technical drawing of an erosion and sediment control plan for the Kingscliff High School Stage 2 Main Works. The plan includes a legend, notes, and a title block. The title block identifies the project as 'KINGSCLIFF HIGH SCHOOL STAGE 2 MAIN WORKS' and lists the consultant as 'ACOR Consultants (QLD) Pty Ltd'. The drawing shows various erosion control measures such as silt fences, sediment basins, and erosion control blankets. It also includes a scale bar and a north arrow.</p>
14	Gabion rock installed at site exit point as alternative to rumble grid	 <p>The photograph shows a site exit point where gabion rock has been installed as an alternative to a rumble grid. The rock is piled in a rectangular area on a paved surface. In the background, there are school buildings and a white truck. The sky is clear and blue.</p>

No.	Comment	Photograph
15	Drill rig onsite being used for ground testing works	
16	Erosion and sediment controls in place protecting live drains on site	

APPENDIX F – DECLARATION FORMS

Declaration of Independence - Auditor




Project Name:	Kingscliff High School Upgrade
Consent Number:	SSD-8744305
Description of Project:	The Department of Education is upgrading Kingscliff High School to provide new permanent teaching spaces and core facilities to accommodate increased student capacity and to address the Education Facilities Standards and Guidelines. The Project includes demolition works to part of existing buildings, additions to existing buildings, construction of a new two (2) storey creative and performing arts (CAPA) building, covered outdoor learning area (COLA), refurbishment works to existing buildings, and new landscaping of the school grounds.
Project Address:	33 Oxford Street, Kingscliff
Proponent:	School Infrastructure NSW
Title of audit	Independent Audit No. 1
Date:	06/04/2022

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor:	Ann Azzopardi
Signature:	
Qualification:	Bachelor of Science (Hons), Environmental Science/Geography – University of Sydney Exemplar Global Auditor Number 114283
Company:	WolfPeak Pty Ltd