

DOC22/1311221

Michael Cassel
Planning Secretary
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Attn: Rob Sherry,

24 October 2022

Dear Mr Cassel

Kingscliff High School (SSD 8744305): Submission of Independent Audit Report and response in accordance with Condition C39 and C40

I refer to SSD Application 8744305, Upgrades to Kingscliff High School, approved on 3 November 2021.

In accordance, with condition C39 of the Development Consent, the following document has been submitted to the Planning Secretary for information, and will be published on the project website within 60 days:

- *Independent Audit No. 2 – Audit Report, Kingscliff High School – SSD 8744305, Steve Fermio, 21 October 2022, Version 1.0.*

As per the requirements of condition C40 the Department must be issued with a response from the proponent to the Independent Audit Report, therefore the following attachments are provided for your information:

- Attachment A - Response to Independent Audit non-compliances
- Attachment B - Response to Independent Audit recommendations
- Attachment C - Evidence of Actions

Yours Sincerely,

Martyn Charlett
Senior Project Director – Schools Infrastructure NSW

Attachment A – Response to Independent Audit non-compliances

Condition ID	Compliance Requirement	Audit findings	Audit Recommendations	Department of Education Actions	Evidence of Actions
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, 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>The Certifier was not notified of the review of plans and programs that was carried out under this condition following IA1. On 8/9/22 the Certifier was subsequently notified of the review. This can now be considered closed.</p>	N/A - Closed	<p>Certifier was notified of review of plans post IA1 on 8/9/22.</p>	<p>Refer non-compliance document submitted to DPE on 9.09.2022 (PA-16).</p>



Attachment B – Response to Independent Audit recommendations

Condition ID	Compliance Requirement	Audit findings	Audit Recommendations	Department of Education Actions	Evidence of actions
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	The sub plans mitigation measures reviewed during IA2 were found to be generally being implemented. However, there was no documentary evidence available to demonstrate the implementation of measure CFF1 (BMP); which requires all earthmoving machinery accessing the Construction Site be cleaned of all soil and vegetable matter prior to entry (it is understood that the traffic controller does check incoming machinery for soil, defects etc).	Recommend that the traffic controller at the entrance gate maintain a record to demonstrate compliance with CFF1.	RCC have updated the front gate check sheet to include requirement to inspect earthmoving machinery prior to entering site and ensure it is clean of all soil and vegetable matter prior to entry.	RCC – reference updated 23.4 Site Induction Checklist Delivery Drivers Action: closed
C13	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009) (ICNG). 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.	Noise management levels (NMLs) in Table 5-1 of the CNVMP (December 2021) are not consistent with those in Table 3 of the ICNG, in particular, internal classroom noise levels (e.g. Kingscliff High School) are omitted from Table 5-1. Noise monitoring undertaken over the period from 30/3/22 to 3/4/22 indicated that the NML (Table 5.1 of the CNVMP) for outdoor recreation areas (55dBA) was exceeded by construction activity on several occasions (noting that the monitoring was not undertaken at the TAFE premises). Furthermore, monitoring reports do not provide evidence of compliance with the other NMLs in Table 5.1 of the CNVMP, however, as noted above, the NMLs in the Plan do not fully reflect the requirements of the ICNG, nor is there sufficient guidance provided regarding the monitoring frequency, locations etc.	The CNVMP requires review with regard to: • including the relevant NMLs for internal classroom noise as per the ICNG • providing more detail of how compliance monitoring with the NMLs (including those applicable to the nearest sensitive residential receiver) will be undertaken (frequency, location etc) during construction • detailing the management response to the outcomes of any exceedances of NMLs	RCC provided Noise Monitoring Report for SSD CAPA Works – which the original report never captured the relocation of equipment. RCC will undertake further baseline noise monitoring to the site prior to the grounds works commencing to Bld O CAPA building for a 1-mth period. This will provide confirmation of the noise levels and compliance with requirements. Duration will initially be 1-month and then we will re-assess noise levels.	Refer ENV Vibration and Noise Monitoring Report 19-April-22 Refer quote and confirmation of noise monitoring to commence when structural works start at CAP (adjacent closest resident). Action: open
N/A	N/A	Version control and document references, dates, titles, footers etc need to updated and kept consistent across the suite of environmental plans and procedures, particularly after they have been revised so as to better demonstrate when they have been reviewed and updated.	Ensure consistency across all plans and procedures at their next review following this audit	RCC are in the process of reviewing all Management Plans and will address this in the new update of each plan.	