

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

Attn: Rob Sherry,

28 April 2023

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:

- *Independent Audit No. 3 – Audit Report, Kingscliff High School – SSD 8744305, Steve Fermio, 24 April 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:

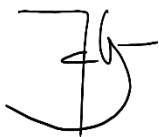
- Attachment A - Response to Independent Audit non-compliances
- Attachment B - Response to Independent Audit observations

SINSW is pleased to advise the Planning Secretary of the environmental performance of the team on site, resulting in no new non-compliances and three positive observations of best practice including:

- Use of concrete rinse washout bags on site
- Photographic recording of wheel track cleaning by gate / traffic controller
- Use of foldup refuelling bund for refuelling on site

In accordance with Condition A27(a)(ix) and C39(c) the project will publish and make publicly available, the independent audit report and response to the recommendations within 60 days of this submission.

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
Nil	Nil	Nil	Nil	Nil	Nil



## Attachment B – Response to Independent Audit observations

ID	Condition	Compliance Requirement	Audit findings	Audit Recommendations	Department of Education Actions	Evidence of actions
8744305_IA 2_03  Previous Audit #2	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 (CNVMP).	RCC current construction methodology looks to incorporate the following actions interfaced with KHS and the construction zones. <ul style="list-style-type: none"> <li>• The shifting of teaching activities away from the buildings directly adjacent to the works.</li> <li>• The utilisation of one piece of machinery at a time in sensitive zones (although not guaranteed to reduce noise emissions below the thresholds).</li> <li>• Scheduling of construction activities causing significant noise to periods where the community are less sensitive to noise (such as before, during lunchbreak and after school).</li> <li>• In the event of highly noise affected threshold being exceeded, ie: rock breaking. RCC will look to incorporate 5 min respite periods every 10 minutes to help receive recorded levels and provide respite to sensitive stakeholders.</li> </ul> The above will be incorporated into REV 6 of the CVMP. Additionally RCC undertook further noise monitoring at KHS during November – December 2022 to re-establish base line levels against the following construction activities - detailed excavation, concrete and concrete structure works. See attached.	The CNVMP requires review with regard to detailing the management response to the outcomes of any exceedances of NMLs.  <b>IA3 Update: This is not specifically addressed in Rev 5 of the CNVMP.</b>  <b>IA3 Response:</b> <b>CNVMP to be revised (Rev 6) to include the following actions:</b> <ul style="list-style-type: none"> <li>• The shifting of teaching activities away from the buildings directly adjacent to the works.</li> <li>• The utilisation of one piece of machinery at a time in sensitive zones (although not guaranteed to reduce noise emissions below the thresholds).</li> <li>• Scheduling of construction activities causing significant noise to periods where the community are less sensitive to noise (such as before, during lunchbreak and after school).</li> <li>• In the event of highly noise affected threshold being exceeded, ie: rock breaking. RCC will look to incorporate 5 min respite periods every 10 minutes to help receive recorded levels and provide respite to sensitive stakeholders.</li> </ul>	RCC to revise the CNVMSP within 3 months, in accordance with Condition A34(c) to incorporate the recommendations provided by the auditor.	OPEN
8744305_IA 3_01  Current Audit #3	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 (CNVMP).	Noise monitoring was undertaken in Nov – Dec 2022 adjacent to close neighbours and current work front of Building O CAPA.  Noise monitoring of demolition works to building A and close to Classrooms undertaken separately. Report Pending.	Future noise monitoring should include an assessment of compliance against the NML in Table 9 of the CNVMP applicable to 'Classrooms', given that these are likely to be among the most noise affected receivers on the project.  If future noise monitoring indicates that the NMLs in the CNVMP are exceeded, consideration of any additional reasonable and feasible mitigation measures should be included in the monitoring report or a record of management's response to this.	RCC to implement the auditor's future noise monitoring recommendations.  If noise levels exceed NMLs, additional mitigation measures are to be implemented and incorporated into the next revision of the CNVMSP.	OPEN