



# INDEPENDENT AUDIT NO. 4 – AUDIT REPORT



KINGSCLIFF HIGH SCHOOL UPGRADE – SSD 8744305

SEPTEMBER 2023

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## ABBREVIATIONS / GLOSSARY

Abbreviation/Term	Description
BCA	Building Code of Australia
CEMP	Construction Environment Management Plan
CoC	Condition of Consent
DPE or Department	Department of Planning and the Environment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
IA	Independent Audit
IAPAR	Independent Audit Post Approval Requirements
PCA	Principal Certifying Authority or Certifier
The Project	The Development approved under SSD-8744305
POEO Act	<i>Protection of the Environment Operations Act 1997 (NSW)</i>
Proponent or Applicant	NSW Department of Education - School Infrastructure NSW
SINSW	School Infrastructure NSW
SSD	State Significant Development

## EXECUTIVE SUMMARY

The NSW Department of Education – School Infrastructure NSW (SINSW) is responsible for delivering the Kingscliff High School Redevelopment Project (the Project) located at 33 Oxford Street, Kingscliff. 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. Consent for the Project, State Significant Development (SSD) 8744305, was granted by the Minister of Planning and Public Spaces on 3 November 2021, subject to a number of Conditions of Consent (conditions).

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).

The objective of this Independent Audit (Audit or IA4) 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 (IAPAR).*

This 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 fourth Independent Audit (IA4) for construction, covering the period from 2 March to 7 August 2023 (the 'audit period').

The overall outcome of the Audit was very positive. Compliance records were well organised and available at the time of the site inspection and interviews with Project personnel. Site environmental controls were of a high standard.

In summary:

- There were 180 conditions assessed
- 100 conditions were not triggered
- 80 conditions were assessed as compliant
- No non-compliances were identified
- Three observations were identified in relation to the Project. These relate to:
  - The identification of noise management levels applicable to the construction phase of the project
  - Toolbox talk or similar training targeting minimizing nuisance noise through measures such as turning radios down or off, increased awareness of school learning activities nearby etc; and
  - Improved protection of two memorial stones from potential construction impacts until such time as a decision is made regarding the future of these stones.

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

# 1. INTRODUCTION

## 1.1 Project overview

The NSW Department of Education – School Infrastructure NSW (SINSW) is responsible for delivering the Kingscliff High School Redevelopment Project (the Project) located at 33 Oxford Street, Kingscliff. 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 by the Minister of Planning and Public Spaces 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. Specifically, upgrades to Kingscliff High School 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.





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

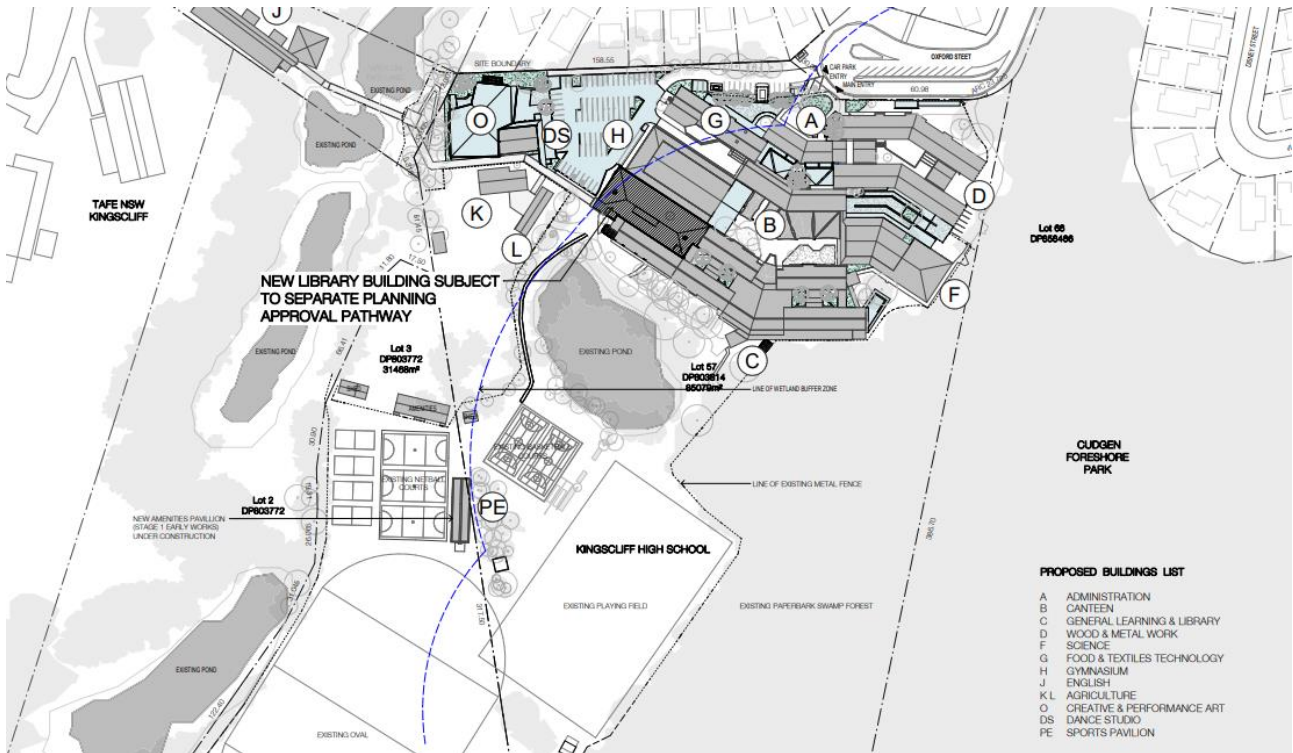


Figure 2: Proposed works under SSD 8744305 (Source: Kingscliff High School Architectural Package, SJB Group, dated 27 April 2021)

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 2 March 2023 and 7 August 2023.) included:

- Roof structure for Building O (CAPA building)
- Completion works on Building A (Administration)
- Internal refurbishment of Building C

## 1.2 The audit team

In accordance with Schedule 2, condition C36 and 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 Auditor for this audit was:

- Steve Fermio (Lead Auditor): Bachelor of Science (Hons), Exemplar Global Certified Lead Environmental Auditor (Certificate No 110498)

Approval of the Audit Team was provided by the Department on 5 September 2022. The letter is presented in Appendix B.

## 1.3 The audit objectives

The objective of this 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 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.

## 1.4 Audit scope

This Audit relates to the Project works between 2 March 2023 and 7 August 2023.

The Audit adopts the IAPAR comprising the following scope:

- an assessment of compliance with:
  - all conditions of consent applicable to the phase of the development that is being audited; and

- 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;
- 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 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 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.

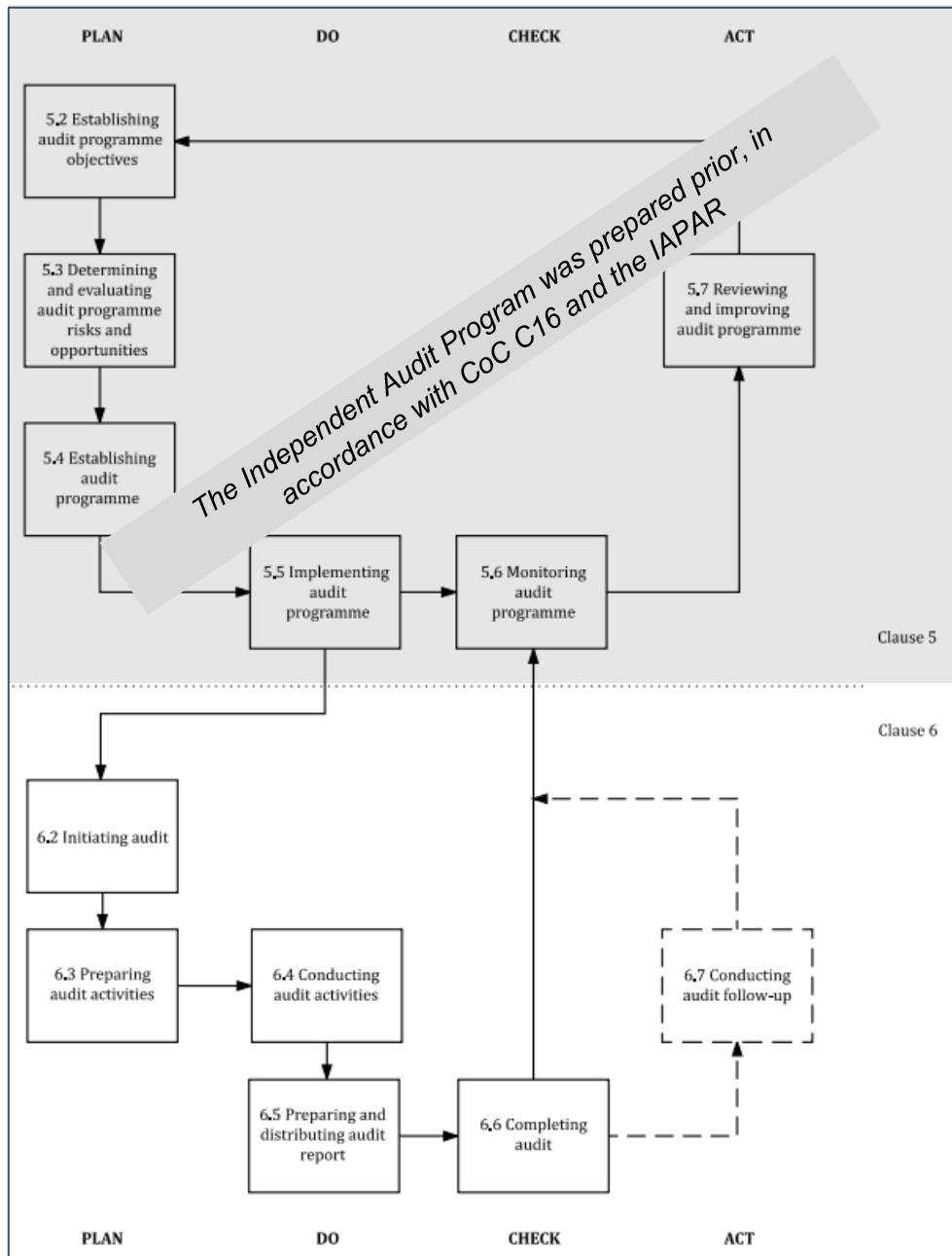


Figure 3: Audit activities overview (modified from AS/NZS ISO 19011). Subclause numbering refers to the relevant subclauses in the Standard.

## 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; and
- Confirm the audit purpose, scope and criteria.

### 2.2.2 Consultation

On 21 July 2023, WolfPeak consulted with the Department to obtain its input into the scope of the Audit and confirm on whether other stakeholders should be consulted in accordance with Section 3.2 of the IAPAR. The consultation records are presented in Appendix C.

### 2.2.3 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, during 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 7, 5 July 2023
- *Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School*, Richard Crookes Constructions, Revision 12, 5 July 2023
- *Construction Worker Transportation Strategy – Kingscliff High School*, Richard Crookes Constructions, Revision 11, 6 January 2023
- *Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 7, 5 July 2023
- *Construction Waste Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 4, 19 July 2023
- *Construction Soil and Water Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 4, July 2023
- *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 3.0, 19 July 2022*

All records and evidence sighted against each condition are detailed within Appendix A.

#### **2.2.4 Site personnel involvement**

The on-site audit activities took place on Monday, 7 August 2023. The following personnel took part in the audit:

- Laura Goodall, Project Manager, MBB Group
- Todd Williams, Foreman, RCC
- Jason Cooke, Senior Project Manager, RCC
- Damian O’Leary, Project Manager, RCC
- Darren Lovell, Site Manager, RCC
- Ethan Coote, Graduate, RCC
- Julian Viafara, WHSE Manager, RCC
- Belinda Luther, Project Coordinator, RCC
- Steve Fermio, WolfPeak (Auditor).

#### **2.2.5 Meetings, Interviews, Site Inspection**

The on-site audit activities including interviews and inspection took place on 7 August 2023. The location of the project site is at 33 Oxford Street, Kingscliff, NSW.

Photos from the inspection are presented in Appendix D. Opening and closing meetings were held on site between the Auditor and Project personnel. 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.

Other communication was conducted remotely, which included requests for information and auditee responses to the requests.

At the closing meeting, preliminary audit findings were presented, preliminary recommendations (as appropriate) were made, and any post-audit actions were confirmed.

#### **2.2.6 Document review**

The 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 Appendix A.

#### **2.2.7 Generating audit findings**

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.

## 2.2.8 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table, as listed in Table 1, below:

*Table 1: Compliance status descriptors*

Status	Description
<b>Compliant</b>	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.
<b>Compliant</b>	WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.
<b>Non-compliant</b>	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.
<b>Not Triggered</b>	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.

## 2.2.9 Evaluation of post approval documentation

The Auditor assessed whether post approval documents:

- have been developed in accordance with the CoCs and their content is adequate
- have been implemented in accordance with the CoCs

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.

## 2.2.10 Completing the audit

The 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 8755305 applicable to the works being undertaken, with a focus on the implementation of noise monitoring measures from the Construction Noise and Vibration Management Plan given the findings of the previous audits undertaken on this project.

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

### 3.2 Summary of Compliance

This section, including Table 2, presents the summary of compliance and recommended actions for the audit findings and the status of previously open audit findings. Detailed findings against each requirement are presented in Appendix A.

In summary:


- There were 180 conditions assessed
- 100 conditions were not triggered
- 80 conditions were assessed as compliant
- No non-compliances were identified
- Three observations were identified in relation to the Project. These relate to:
  - The identification of noise management levels appropriate to the construction phase of the project
  - Toolbox talk or similar training targeting minimizing nuisance noise through measures such as turning radios down or off, increased awareness of school learning activities nearby etc; and
  - Improved protection of two memorial stones from potential construction impacts until such time as a decision is made regarding the future of these stones.



Table 2: Audit findings and actions

Item ID	Ref.	Category	Condition / Audit Finding	Recommended or completed actions	By whom and by when	Status
<b>Findings from IA2</b>						
<b>SSI 8744305 Conditions of Approval</b>						
8744305_IA2_03	C13	Observation	<p>Requirement: <i>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.</i></p> <p><b>Observation:</b></p> <p><b>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.</b></p> <p><b>Noise monitoring undertaken over the period from 30 March 2022 to 3 April 2022 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.</b></p> <p><b>IA3 response:</b> RCC current construction methodology looks to incorporate the following actions interfaced with KHS and the construction zones.</p> <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> <p>The above will be incorporated into REV 6 of the CVMP.</p> <p>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.</p> <p><b>IA4 update:</b> The proposed response (as per IA3 response above) to finding 8744305_IA2_03 has not been actioned or addressed in Rev 7 of the CNVMP.</p>	<p>The CNVMP requires review with regard to:</p> <ul style="list-style-type: none"> <li>• detailing the management response to the outcomes of any exceedances of NMLs</li> </ul> <p><b>IA3 Update: This is not specifically addressed in Rev 5 of the CNVMP.</b></p> <p><b>IA3 Response:</b></p> <p>CNVMP to be revised (Rev 6) to include the following actions:</p> <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, i.e.: 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> <p><b>IA4 Update: The proposed response above has not been addressed in Rev 7 of the CNVMP</b></p>	RCC	OPEN
<b>Findings from IA3</b>						
<b>SSI 8744305 Conditions of Approval</b>						

Item ID	Ref.	Category	Condition / Audit Finding	Recommended or completed actions	By whom and by when	Status
8744305_IA3_01	C13	Observation	<p>Requirement: <i>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.</i></p> <p><b>Observation</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>IA4 update:</b> Monitoring undertaken in Feb – March 2023 does not address this finding adequately. See observation against C13 below.</p>	<p>Noise monitoring was undertaken in Nov – Dec 2022 adjacent to close neighbours and current work front of Building O CAPA.</p> <p>Noise monitoring of demolition works to building A and close to Classrooms undertaken separately. Report Pending</p>	RCC - JC	OPEN
<b>Findings from IA4</b>						
<b>SSI 8744305 Conditions of Approval</b>						
8744305_IA4_01	C13	Observation	<p>Requirement: <i>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.</i></p> <p><b>Observation:</b></p> <p>Noise monitoring was undertaken in Feb – March 2023. The noise monitoring report (ENV Solutions 30 May 2023) has not assessed compliance against the relevant NML but only applied the highly noise affected level of 75dB(A) as the criteria to assess compliance. This means that all reasonable and feasible mitigation measures may have not been considered or identified by the project to achieve compliant with the relevant NMLs (e.g., those in Table 5-1 and Table 9, which are much lower).</p> <p><i>Note: Notwithstanding the above it is noted that noise impacts are managed through weekly liaison meetings between RCC and the School (e.g., limiting high noise activities during examination periods) and that no complaints regarding noise have been received from the community.</i></p> <p><i>The Applicant also provided information indicating that community consultation and noise monitoring with highly noise affected SMS warning are effective management methods for the demolition and construction works.</i></p>	<p>If any future noise monitoring is conducted on the project, it should assess compliance with the relevant NMLs in section 5.3 of the CNVMP. It is the auditor’s opinion that the highly noise affected level of 75dBA is not the appropriate NML to apply in this circumstance.</p> <p>If any exceedances with the relevant NMLs are identified the project team should consider if any additional feasible and reasonable noise mitigation measures could be adopted in an effort to achieve compliance with the relevant NMLs (<i>noting that compliance with the relevant NMLs in Tables 5-1 and 9 at all times may not be possible under the circumstances</i>).</p>	RCC	OPEN
8744305_IA4_02	C13	Observation	<p>Requirement: <i>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</i></p> <p><b>Observation:</b></p> <p>It was noted during the site inspection that a radio being used by site personnel was very audible (this was turned down during the course of the inspection)</p>	<p>Specific toolboxes were undertaken after the audit targeting minimizing nuisance noise through measures such as turning radios down or off, increased awareness of school learning activities nearby</p>	RCC	CLOSED

Item ID	Ref.	Category	Condition / Audit Finding	Recommended or completed actions	By whom and by when	Status
8744305_IA4_03	NA	Observation	It was noted during the site inspection that two Indigenous related memorial obelisk stones (not artefacts) were stored in a manner that could potentially be impacted by construction activities (Appendix D)	Ensure the protection of the two memorial stones (e.g. temporary protective fencing or relocation away from the active construction zone etc) from potential construction impacts until such time as a decision is made regarding the future of these stones	RCC Memorial stones were relocated away from the active construction zone and temporary fencing was installed. 	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-conformances or observations resulting from the implementation of the document, and
- There are any opportunities for improvement.

A more detailed review was conducted of the:

- *Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade*, Richard Crookes Constructions, Rev 7, 5 July 2023

A non-compliance and observation were made against C13 as detailed in Table 2 above. It was also noted that a previous finding in IA2 related to updating the CNVMP and noise monitoring has not yet been addressed.

Apart from the issues raised above, based on the overall findings of the audit, site inspection and interview, the plans are considered adequate for the works being undertaken.

### 3.4 Summary of notices from agencies

To the Auditor's knowledge no formal notices were issued by the Department or other agencies during the audit period.

### 3.5 Other matters considered relevant by the Auditor or DPE

Other than the matters identified in Sections 3.2 and 3.3, there were no other matters considered relevant by the Auditor.

#### ***Matters considered by the Department***

During consultation, the Department requested the Audit consider the following within the scope of the audit:

- A review of the project administrative housekeeping to determine that all plans, programs and strategies required by the consent have been provided or are being addressed.

*Audit Response: The audit found that plans, programs and strategies were provided and are up to date and made available on the Project's website. Project administrative housekeeping was of a high order. The CNVMP still requires further updating to address the IA2 findings.*

### 3.6 Complaints

A complaints register is being maintained for the development. No complaints were received during the audit period. The complaints register is published on the Project website.

<https://www.schoolinfrastructure.nsw.gov.au/projects/k/kingscliff-high-school-upgrade.html#category-reports>

### 3.7 Incidents

The Project has not identified any reportable incidents as defined in the SSD 8744305 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 2 March to 7 August 2023) included:

- Roof structure for Building O (CAPA building)
- Completion works on Building A (Administration)
- Internal refurbishment of Building C

Given the relatively limited nature of the works undertaken during the audit period, no complaints, no environmental incidents and absence of regulatory action by any agencies, it is considered that the environmental impacts of the development during the audit period were relatively minor and qualitatively well within that predicted by the EIS and RtS. The physical extent of the Project works appeared to be consistent with the approved boundaries shown in the consent's layout plans.

### 3.9 Environmental performance

The overall outcome of this audit indicated that compliance was proactively tracked by the key project personnel. The following strengths were demonstrated by the Project team in managing compliance against the Conditions of Consent:

- Compliance records were well organised and available at the time of the site inspection and interviews with Project personnel.



- On the day of the audit site inspection environmental controls and housekeeping were observed to be of a high standard and no offsite impacts were observed.

## 4. CONCLUSIONS

This Audit Report presents the findings from the fourth Independent Audit (IA4) for the construction period, covering the period from 2 March to 7 August 2023.

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.

No environmental incidents and no complaints were recorded during the audit period. Not all of the findings from the previous (IA2 & IA3) audits have been closed out. These are related to noise monitoring.

In summary:

- There were 180 conditions assessed
- 100 conditions were not triggered
- 80 conditions were assessed as compliant
- No non-compliances were identified
- Three observations were identified in relation to the Project. These relate to:
  - The identification of noise management levels appropriate to the construction phase of the project
  - Toolbox talk or similar training targeting minimizing nuisance noise through measures such as turning radios down or off, increased awareness of school learning activities nearby etc; and
  - Improved protection of two memorial stones from potential construction impacts until such time as a decision is made regarding the future of these stones.

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 MBB Group, and Richard Crookes Constructions for their exceptional 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:

This Document has been prepared for the particular purpose/s outlined in the WolfPeak proposal/contract/relevant terms of engagement, or as otherwise agreed, between WolfPeak and the Client.

In preparing this Document, WolfPeak has relied upon data, surveys, analyses, designs, plans and other information provided by the Client and other individuals and organisations (the information). Except as otherwise stated in the Document, WolfPeak has not verified the accuracy or completeness of the information. To the extent that the statements, opinions, facts, findings, conclusions and/or recommendations in this Document (conclusions) are based in whole or part on the information, those conclusions are contingent upon the accuracy and completeness of the information. WolfPeak will not be liable in relation to incorrect conclusions should any information be incomplete, incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to WolfPeak.

With respect to conditions relating to compliance with the design, Building Codes of Australia (BCA) or satisfaction of the Independent Verifier / Certifier / Certifying Authority, the Independent Audits relied on confirmation from the Independent Verifier / Certifier / Certifying Authority that this is the case. The Independent Audits do not extend to an assessment of the works against the design or BCA requirements themselves, nor did they examine the steps the Independent Verifier / Certifier / Certifying Authority has taken to verify that the design is compliant.

The assessment of actual impacts and those predicted in the Environmental Impact Assessment(s) was a high-level assessment qualitative assessment only. The Environmental Impact Assessment(s) include a voluminous number of studies and predictions that relied on observation, measurement and modelling of the existing environments and potential outcomes arising from the Project (including mitigation measures). 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 requirements specified in the, to the Auditor's knowledge there are no requirements to undertake such studies and doing so does not form part of this Independent Audit.

Audits of all post approval documents prepared to satisfy the conditions, including an assessment of the implementation of Environmental Management Plans and Sub-plans, adopts a Judgement Based Sampling approach. Judgement Based Sampling is the process of selecting a sample of commitments and evidence from within the total available data set (population) to obtain and evaluate evidence about some characteristic of that population, in order to form a conclusion concerning the population.

This Document has been prepared for the exclusive benefit of the Client and no other party. WolfPeak bears no responsibility for the use of this Document, in whole or in part, in other contexts or for any other purpose. WolfPeak bears no responsibility and will not be liable to any other person or organisation for or in relation to any matter dealt with in this Document, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in this Document (including without limitation matters arising from any negligent act or omission of WolfPeak or for any loss or damage suffered by any other party relying upon the matters dealt with or conclusions expressed in this Document). Other parties should not rely upon this Document or the accuracy or completeness of any conclusions and should make their own inquiries and obtain independent advice in relation to such matters.

To the best of WolfPeak's knowledge, the facts and matters described in this Document reasonably represent the Client's intentions at the time of which WolfPeak issued the Document to the Client. However, the passage of time, the manifestation of latent conditions or the impact of future events (including a change in applicable law) may have resulted in a variation of the Document and its possible impact. WolfPeak will not be liable to update or revise the Document to take into account any events or emergent circumstances or facts occurring or becoming apparent after the date of issue of the Document.





## APPENDIX A – SSD-8744305 CONDITIONS OF CONSENT

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status																																																																																												
<b>Part A Administrative conditions</b>																																																																																																
<b>Obligation to Minimise Harm to the Environment</b>																																																																																																
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 and Appendices	Feasible and reasonable measures were observed to be implemented for the construction at the time of the audit, noting the observation and non compliance referred to in this audit table against C13.	Compliant																																																																																												
<b>Terms of Consent</b>																																																																																																
A2	<p>The development may only be carried out:</p> <ul style="list-style-type: none"> <li>a) in compliance with the conditions of this consent;</li> <li>b) in accordance with all written directions of the Planning Secretary;</li> <li>c) generally in accordance with the EIS and Response to Submissions;</li> <li>d) in accordance with the approved plans in the table below:</li> </ul> <table border="1"> <thead> <tr> <th colspan="4">Architectural Drawings prepared by <i>Richard Crookes Construction</i></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 &amp; Demolition - Ground</td><td>20/08/2021</td></tr> <tr><td>A-X-0112</td><td>5</td><td>Site Plan - Existing &amp; Demolition - Level 1</td><td>20/08/2021</td></tr> <tr><td>A-X-0113</td><td>5</td><td>Site Plan - Existing &amp; 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 &amp; 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 &amp; Demolition - Ground</td><td>08/07/2021</td></tr> <tr><td>A-C-0202</td><td>3</td><td>Building C - Middle - Existing &amp; Demolition - Ground</td><td>08/07/2021</td></tr> <tr><td>A-C-0203</td><td>3</td><td>Building C - West - Existing &amp; Demolition - Ground</td><td>08/07/2021</td></tr> <tr><td>A-C-0204</td><td>3</td><td>Building C - East - Existing &amp; Demolition - Level 1</td><td>08/07/2021</td></tr> <tr><td>A-C-0205</td><td>3</td><td>Building C - Middle - Existing &amp; Demolition - Level 1</td><td>08/07/2021</td></tr> <tr><td>A-C-0206</td><td>3</td><td>Building C - West - Existing &amp; 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 <i>Richard Crookes Construction</i>				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>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>Approved Plans (approved on 3/11/2021) by the DPE prepared by BM dated 20/08/2021</p> <p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Crown Certificate (Stage 2) CRO 22021 issued 11 March 2022</p> <p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>Crown Certificate (Stage 4) CRO 22043, Blackett Maguire + Goldsmith, issued 8 May 2023</p> <p>Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023</p>	<p>There have been no written directions from the Planning Secretary.</p> <p>Evidence indicates development is being carried out in accordance with environmental documents and approval conditions</p>	Compliant
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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			
<b>Landscape Plans prepared by Black Beetle</b>						
<b>Dwg No.</b>	<b>Rev</b>	<b>Name of Plan</b>	<b>Date</b>			
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 &amp; 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 &amp; 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 &amp; 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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KHS LA CD 504	02	Irrigation Extent Plan - Blg D & F	07/06/2021																																																	
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"> <li>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;</li> <li>any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and</li> <li>the implementation of any actions or measures contained in any such document referred to in (a) above.</li> </ol>	<p>Interview with auditees 7/08/2023</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>Letter to DPE from SINSW dated 23 May 2022 advising that a review of strategies, plans and programs is taking place in accordance with Condition A34</p> <p>Letter to DPE from SINSW dated 2 May 2022 submitting updated versions of the Construction Environmental Management Plan and Aboriginal Heritage Management Plan</p> <p>Letter to DPE from SINSW dated 5 May 2022 submitting updated versions of the Flood Emergency Response Plan</p> <p>No directions issued noting letter to SINSW from DPE dated 12<sup>th</sup> September 2022 detailing a Show Cause Alleged Breach of Section 4.2 EPA Act (related to findings from IA1).</p> <p>Letter to DPE from SINSW dated 26 September 2022 submitting response to Show Cause (related to findings from IA1).</p>	<p>No written directions received from DPE during audit period</p>	Compliant																																																
A4	<p>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</p>	<p>Interview with Auditees 7/08/2023</p> <p>These conditions of consent and documents referred to elsewhere in this audit table.</p>	<p>This audit assesses compliance with the conditions of consent.</p> <p>No inconsistencies, ambiguity or conflict between conditions and documents</p>	Not triggered																																																
<b>Limit of Consent</b>																																																				
A5	<p>This consent lapses five years after the date of consent unless work is physically commenced.</p>	<p>Development Consent, SSD-8744305, 03/11/2021</p>	<p>Consent was granted on 03/11/2021.</p> <p>Works commenced on 20/12/2021, as notified by SINSW to DPE.</p>	Compliant																																																

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Letter SINSW to DPE, DOC21/1323432, 14/12/2021	Works ongoing in the current audit period	
<b>Prescribed Conditions</b>				
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>No directions issued since IA1</p> <p>Crown Certificate (Stage 2) CRO 22021 issued 11 March 2022</p> <p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>Crown Certificate (Stage 4) CRO 22043, Blackett Maguire + Goldsmith, issued 8 May 2023</p> <p>Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023</p>	<p>This condition refers to Part 6, Division 8A of the EP&amp;A Regulation 2000, which has now been superseded by the EP&amp;A Regulation 2021. The former prescribed conditions of the EP&amp;A Regulation 2000 have been superseded by Part 4, Division 2, Subdivision 1 of the EP&amp;A Regulation 2021, and with regards to the Project, primarily relate to compliance with the BCA.</p> <p>Part 6, Division 8A of the EP&amp;A relates to prescribed conditions for:</p> <ul style="list-style-type: none"> <li>• Compliance with the BCA (Stage 1 Crown Certificate received)</li> <li>• Erection of signs (construction signage sighted – refer to C1)</li> <li>• Residential building work (not relevant)</li> <li>• Entertainment venues (not relevant)</li> <li>• Signage for max number of persons in venues (not relevant for construction)</li> <li>• Shoring and adjoining properties (no properties are adjoining to the Project).</li> </ul> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</p>	Compliant
<b>Planning Secretary as Moderator</b>				
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 07/08/2023	The auditees advised that there have been no disputes with any public authorities in relation to an applicable requirement in the approval (SSD-8744305) or relevant matter relating to the consent.	Not triggered
<b>Evidence of Consultation</b>				
A8	<p>Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <p>a) consult with the relevant party prior to submitting the subject document for information or approval; and</p> <p>b) provide details of the consultation undertaken including:</p> <p>i. the outcome of that consultation, matters resolved and unresolved; and</p> <p>ii. details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p>	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
<b>Staging</b>				
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	<p>Interview with auditees, 07/08/2023</p> <p>Staging Report SSD-8744305 Upgrades to Kingscliff High School 25/07/2023 by DFP Planning Consultant</p>	The Staging Report has been prepared for the project, outlining the planned sequence of delivery for the occupation of the Project in ten (10) distinct stages.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	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).	Letter 03/08/2023 SINSW-DPE re: Submission of Staging Report – Operation Post Approval (DPE Portal) Submission of Staging Report – Operation to DPE	Building A ground floor is scheduled to be the first stage of occupation, with an indicative timing expected in Quarter 3, 2023. Staging Report was recently submitted to the Department on 3 August 2023 and is now awaiting the Department's approval..	
A10	A Staging Report prepared in accordance with condition A9 must: <ul style="list-style-type: none"> <li>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;</li> <li>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);</li> <li>c) specify how compliance with conditions will be achieved across and between each of the stages of the project; and</li> <li>d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.</li> </ul>	Interview with auditees, 07/08/2023 Staging Report SSD-8744305 Upgrades to Kingscliff High School 25/07/2023 by DFP Planning Consultant Letter 03/08/2023 SINSW-DPE re: Submission of Staging Report – Operation Post Approval (DPE Portal) Submission of Staging Report – Operation to DPE	The Staging Report has been prepared for the project, outlining the planned sequence of delivery for the occupation of the Project in ten (10) distinct stages. Building A ground floor is scheduled to be the first stage of occupation, with an indicative timing expected in Quarter 3, 2023. The Staging Report was prepared in accordance with the requirements specified in this condition. Staging Report (25 July 2023) was recently submitted to the Department on 3 August 2023 and is now awaiting the Department's approval.	Compliant
A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	Interview with auditees, 07/08/2023 Staging Report SSD-8744305 Upgrades to Kingscliff High School 25/07/2023 by DFP Planning Consultant Letter 03/08/2023 SINSW-DPE re: Submission of Staging Report – Operation Post Approval (DPE Portal) Submission of Staging Report – Operation to DPE	The Staging Report has been prepared for the project, outlining the planned sequence of delivery for the occupation of the Project in ten (10) distinct stages. Staging Report (25 July 2023) was recently submitted to the Department on 3 August 2023 and is now awaiting the Department's approval.	Compliant
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.	Interview with auditees, 07/08/2023 Staging Report SSD-8744305 Upgrades to Kingscliff High School 25/07/2023 by DFP Planning Consultant Letter 03/08/2023 SINSW-DPE re: Submission of Staging Report – Operation Post Approval (DPE Portal) Submission of Staging Report – Operation to DPE	The Staging Report has been prepared for the project, outlining the planned sequence of delivery for the occupation of the Project in ten (10) distinct stages. Building A ground floor is scheduled to be the first stage of occupation, with an indicative timing expected in Quarter 3, 2023. Staging Report (25 July 2023) was recently submitted to the Department on 3 August 2023 and is now awaiting the Department's approval.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Staging, Combining and Updating Strategies, Plans or Programs</b>				
A13	<p>The Applicant may:</p> <ol style="list-style-type: none"> <li>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);</li> <li>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</li> <li>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)</li> </ol>	<p>Staging Report SSD-8744305 Upgrades to Kingscliff High School 25/07/2023 by DFP Planning Consultant</p> <p>Letter 03/08/2023 SINSW-DPE re: Submission of Staging Report – Operation</p> <p>Post Approval (DPE Portal) Submission of Staging Report – Operation to DPE</p> <p>The following plans were updated during the audit period:</p> <ul style="list-style-type: none"> <li>Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5 July 2023 – general review and update</li> <li>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 12, 5/07/2023 – Review of management plan</li> <li>Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023 – (general review and update)</li> <li>Construction Waste Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 19/07/2023 – General review and update Appendix C</li> <li>Flood Emergency Response Plan Rev 3 19/07/2023, Molino Stewart</li> </ul>	<p>During this audit period, a Staging Report has been prepared for the project, outlining the planned sequence of delivery for the occupation of the Project in ten (10) distinct stages.</p> <p>The Staging Report (25 July 2023) was recently submitted to the Department on 3 August 2023 and is now awaiting the Department's approval.</p> <p>Documents have not been combined during the audit period.</p> <p>In line with A13 (c), updates were made to the following plans:</p> <ul style="list-style-type: none"> <li>CEMP Rev 7 (5 July 2023)</li> <li>CTPMSP Rev 12 (5 July 2023)</li> <li>CNVMP Rev 7 (5 July 2023)</li> <li>CWMP Rev 4 (19 July 2023)</li> <li>Flood Emergency Plan Rev 3 (19 July 2023)</li> </ul>	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>Staging Report SSD-8744305 Upgrades to Kingscliff High School 25/07/2023 by DFP Planning Consultant</p> <p>Letter 03/08/2023 SINSW-DPE re: Submission of Staging Report – Operation</p> <p>Post Approval (DPE Portal) Submission of Staging Report – Operation to DPE</p>	The Staging Report (25 July 2023) was recently submitted to the Department on 3 August 2023 and is now awaiting the Department's approval. This is the initial Staging Report for the Project.	Not triggered
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.	<p>Interview with auditees 07/08/2023</p> <p>Staging Report SSD-8744305 Upgrades to Kingscliff High School 25/07/2023 by DFP Planning Consultant</p> <p>Letter 03/08/2023 SINSW-DPE re: Submission of Staging Report – Operation</p> <p>Post Approval (DPE Portal) Submission of Staging Report – Operation to DPE</p>	The Staging Report (25 July 2023) was recently submitted to the Department on 3 August 2023 and is now awaiting the Department's approval.	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>Interview with auditees 07/08/2023</p> <p>Staging Report SSD-8744305 Upgrades to Kingscliff High School 25/07/2023 by DFP Planning Consultant</p> <p>Letter 03/08/2023 SINSW-DPE re: Submission of Staging Report – Operation</p>	<p>The Staging Report (25 July 2023) was recently submitted to the Department on 3 August 2023 and is now awaiting the Department's approval. This is the initial Staging Report for the Project.</p> <p>Evidence collected during this audit indicates revised plans are being implemented.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p>Post Approval (DPE Portal) Submission of Staging Report – Operation to DPE</p> <p>Submission of updated CEMP and sub-plans to Certifier 19/07/2023</p> <p>Submission of updated CEMP and sub-plans to Department 27/07/2023</p> <p>Post Approval (DOE Portal) submission of CEMP and sub-plans</p> <p>The following plans were updated during the audit period:</p> <ul style="list-style-type: none"> <li>• Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5 July 2023 – general review and update</li> <li>• Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 12, 5/07/2023 – Review of management plan</li> <li>• Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023 – (general review and update)</li> <li>• Construction Waste Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 19/07/2023 – General review and update Appendix C</li> <li>• Construction Soil and Water Management Sub Plan Rev 4 July 2023 by RCC</li> <li>• Construction Hazardous Material Management Plan Rev 2, July 2023 by RCC</li> <li>• Construction Worker Transportation Strategy Rev 3, July 2023</li> <li>• Flood Emergency Response Plan Rev 3 19/07/2023, Molino Stewart</li> </ul>		



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Structural Adequacy</b>				
A17	<p>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.</p> <p><i>Note: Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</i></p>	<p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Design Certificate – COLA Structure (SSDA), ACOR Consultants, 10/12/2021</p> <p>Crown Certificate (Stage 2) CRO 22021 issued 11 March 2022</p> <p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>Design Certificate: Structural, 27/04/2023 issued by ACOR Consultant</p> <p>Crown Certificate (Stage 4) CRO 22043, Blackett Maguire + Goldsmith, issued 8 May 2023</p> <p>Certificate of Compliance: Structural, 24/04/2023 issued by Graeme Moulston &amp; Associates Engineering P/L</p> <p>Design Certificate: Structural, 28/06/2023 issued by Acor Consultants P/L</p> <p>Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023</p>	<p>The Certifier has verified that the works to date are consistent with the approved design having issued five Crown Certificates.</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</p>	Compliant
<b>External Walls and Cladding</b>				
A18	<p>The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA</p>	<p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Installation Statement – External Walls &amp; Finishes, from Richard Crookes Construction to the Certifier (BM+G), dated 06/12/2021</p> <p>Crown Certificate (Stage 2) CRO 22021 issued 11 March 2022</p> <p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>Crown Certificate (Stage 4) CRO 22043, Blackett Maguire + Goldsmith, issued 8 May 2023</p> <p>External Wall System Disclosure Statement , 11/07/2022 issued by Bickerton Masters</p> <p>Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023</p>	<p>The Certifier has verified that the design meets the requirements of the BCA and has issued five Crown Certificates.</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice</p>	Compliant
<b>External Materials</b>				
A19	<p>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:</p> <ul style="list-style-type: none"> <li>a) the alternative colour/material is of a similar tone/shade and finish to the approved external colours/building materials;</li> <li>b) the quality and durability of any alternative material is the same standard as the approved external building materials; and</li> </ul>	<p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Installation Statement – External Walls &amp; Finishes, from Richard Crookes Construction to the Certifier (BM+G), dated 06/12/2021</p> <p>Crown Certificate (Stage 2) CRO 22021 issued 11 March 2022</p>	<p>Stage 1 Crown Certificate (CRO-21085) references Installation Statement for external walls and finishes, prepared by Richard Crookes Construction.</p> <p>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.</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	c) a copy of any approved changes to the external colours and/or building materials is provided to the Planning Secretary for information.	<p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>Crown Certificate (Stage 4) CRO 22043, Blackett Maguire + Goldsmith, issued 8 May 2023</p> <p>External Wall System Disclosure Statement , 11/07/2022 issued by Bickerton Masters</p> <p>Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023</p>		
<b>Design and Construction for Bush Fire</b>				
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.	<p>Bushfire Assessment Report SSD-8744305, Cool Burn Fire and Ecology, v1.2, 21/07/2021</p> <p>Drawing – Hydraulic Services Proposed Site Plan, ACOR Consultants, KHS-H10.01, 06/09/2021</p> <p>Crown Certificate (Stage 2) CRO 22021 issued 11 March 2022</p> <p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>Bush Fire Markup Plans multiple dates by Bickerton Masters</p> <p>Bushfire Planning Assessment – review bushfire construction elements for architectural drawings prepared by Richard Crooks Constructions, 09/12/2021 by Cool Burn Fire &amp; Ecology</p> <p>Design Certificate: Hydraulic Fire Services 12/04/2023 issued by ACOR Consultants</p> <p>Fire Hydrant &amp; Hydraulic Services Design 05/04/2023 by Bickerton Masters</p> <p>Crown Certificate (Stage 4) CRO 22043, Blackett Maguire + Goldsmith, issued 8 May 2023</p> <p>Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023</p>	<p>The Bushfire Planning Assessment has been updated with a version dated 09/12/2021, prepared by Cool Burn Fire and Ecology that relates to review bushfire construction elements for architectural drawings prepared by Richard Crooks Constructions . This version was approved by the Certifier through the issuance of Crown Certificate Stage 4.</p> <p>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.</p> <p>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. This would likely be covered in a future CC</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</p>	Compliant
<b>Design and construction for Flood risk</b>				
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.	<p>SINSW01427-20 - Kingscliff High School Flooding Assessment Phase 2, GHD, April 2021</p> <p>Letter GHD to MBB Group, 13/08/2021</p> <p>Flood Emergency Response Sub-Plan – Kingscliff High School, Molino Stewart, Rev 3.0, 03/05/2022</p> <p>Bickerton Masters letter to PCA dated 6/12/21</p>	<p>Refer to evidence cited, as well as A22, below.</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</p>	Compliant
A22	Building O must have a minimum finished floor level of 5.85 AHD.	<p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Design Statement letter from Bickerton Masters, dated 06/12/2021:</p> <p>Drawing KHS-A-0-0202</p>	<p>The auditees advised that the Building O FFL is 6.500 which complies with this requirement.</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p>Drawings sighted (minimum level 6.48 shown)</p> <p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>RCC Email dated 15/3/23 plus attached plans from Jason Cooke to auditor regarding Building O floor levels</p>		
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.	<p>Drawings, Building A – Administration – Wall Sections, KHS-A-A-0701 (Rev 3); KHS-A-A-0702 (Rev 2); KHS-A-A-0703 (Rev 2)</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>The Building A drawings provided show ground level is at 7.010m AHD.</p> <p>The Structural Design Certification letter provided by ACOR Consultants confirms the following:</p> <p>“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.”</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice</p>	Compliant
<b>Applicability of Guidelines</b>				
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)	The project plans appear to reference the current versions of guidelines, protocols, Standards or policies relevant to the topics that each document addresses.	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, 07/08/2023	No written directions issued during audit period.	Not triggered
<b>Monitoring and Environmental Audits</b>				
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&amp;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&amp;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>	<p>Evidence referred to elsewhere in this Audit Table.</p> <p>Interview with auditees, 07/08/2023</p> <p>Part 9, Div 9.4 of the EPAA</p> <p>Independent Audit No. 3, WolfPeak, 24/04/2023</p>	<p>The relevant section of the EP&amp;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 during the audit period.</p> <p>The third Independent Audit has been conducted completed in accordance with ISO19011 and the Department’s Independent Audit Post Approval Requirements.</p>	Compliant
<b>Access to Information</b>				
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>a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <p>i. the documents referred to in condition A2 of this consent;</p>	<p>SINSW Project website:  <a href="https://www.schoolinfrastructure.nsw.gov.au/projects/k/kingscliff-high-school-upgrade.html#category-reports">https://www.schoolinfrastructure.nsw.gov.au/projects/k/kingscliff-high-school-upgrade.html#category-reports</a></p> <p>DPE Planning Portal website:  <a href="https://www.planningportal.nsw.gov.au/major-projects/projects/upgrades-kingscliff-high-school">https://www.planningportal.nsw.gov.au/major-projects/projects/upgrades-kingscliff-high-school</a></p>	<p>Relevant documents required under A27 are available on the SINSW Project website, as follows:</p> <p>i. and ii. – Link included to the NSW Planning Portal page for the Project</p> <p>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.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>ii. all current statutory approvals for the development;</li> <li>iii. all approved strategies, plans and programs required under the conditions of this consent;</li> <li>iv. 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;</li> <li>v. 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;</li> <li>vi. a summary of the current stage and progress of the development;</li> <li>vii. contact details to enquire about the development or to make a complaint;</li> <li>viii. a complaints register, updated monthly;</li> <li>ix. audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;</li> <li>x. any other matter required by the Planning Secretary; and</li> </ul> <p>b) 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>		<ul style="list-style-type: none"> <li>iv. Appendix A of CNVMP includes noise monitoring conducted in November - December 2022.</li> <li>v. Noise monitoring undertaken in December 2022 included as appendix in Rev 5 of CNVMP available on project website</li> <li>vi. Last Project Update and Works Notification is for Nov 2022 respectively.</li> <li>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.</li> <li>viii. – Complaints Register for July 2023 available on website (no complaints reported to date).</li> <li>ix. – IA1, IA2 and IA3 reports and proponent responses available on website</li> <li>x. – Not triggered</li> </ul> <p>Whilst the CEMP and Sub-Plans are not required to be approved (and subsequently uploaded to the Project website under A27(a)(iii)), latest versions of the plans have been uploaded to the website.</p>	
<b>Compliance</b>				
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>Interview with auditees 07/08/2023</p> <p>Site Induction Presentation - Kingscliff Public &amp; High School Redevelopment, Richard Crookes Constructions, 20/07/2022</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>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> <p>Environmental toolbox talk on 3/8/23 on waste reduction and RCC environmental policy, reducing unnecessary noise</p> <p>Weekly toolbox covers environment for KHS</p>	<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.</p> <p>Environmental toolbox talks with a specific focus on waste reduction and minimizing unnecessary noise were conducted and disseminated to the relevant projects involved.</p>	Compliant
<b>Incident Notification, Reporting and Response</b>				
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, 07/08/2023	The auditees advised that no incidents have been reported on the Project during the audit period.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
A30	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.	Interview with auditees, 07/08/2023	The auditees advised that no incidents have been reported on the Project during the audit period.	Not triggered
<b>Non-Compliance Notification</b>				
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, 07/08/2023 Independent Audit No. 3, WolfPeak, 24/04/2023	No non-compliances reported during the audit period or during the IA4; thus, no non-compliance notification is required.	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.	Interview with auditees, 07/08/2023 Independent Audit No. 3, WolfPeak, 24/04/2023	No non-compliances reported during the audit period or during the IA4; thus, no non-compliance notification is required.	Not triggered
A33	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Interview with auditees 07/08/2023	No incidents were reported during the audit period	Not triggered
<b>Revision of Strategies, Plans and Programs</b>				
A34	<p>Within three months of:</p> <ul style="list-style-type: none"> <li>a) the submission of a compliance report under condition A37;</li> <li>b) the submission of an incident report under condition A30;</li> <li>c) the submission of an Independent Audit under condition C37 or C38;</li> <li>d) the approval of any modification of the conditions of this consent; or</li> <li>e) the issue of a direction of the Planning Secretary under condition A2 which requires a review,</li> </ul> <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>IA1 Audit Report dated 04/05/22</p> <p>IA2 Audit Report dated 21/10/2022</p> <p>SINSW letter submission of IA3 Report and response to DPE dated 24/10/2022</p> <p>IA3 Audit Report dated 24/04/2023</p> <p>SINSW letter submission of IA3 Report and response to DPE dated 28/04/2023</p> <p>Letter 08/05/2023 SINSW-DPE re: Notification of review is being undertaken of strategies, plans and programs</p> <p>General Correspondence 8/05/2023 MBBG-Certifier re: Submission of notification of review is being undertaken of strategies, plans and programs to Certifier</p> <p>Submission of updated CEMP and sub-plans to Certifier 19/07/2023</p> <p>Submission of updated CEMP and sub-plans to Department 27/07/2023</p> <p>Post Approval (DOE Portal) submission of CEMP and sub-plans</p> <p>The following plans were updated during the audit period:</p> <ul style="list-style-type: none"> <li>• Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5 July 2023 – general review and update</li> <li>• Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 12, 5/07/2023 – Review of management plan</li> <li>• Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade,</li> </ul>	<p>a) The project has adopted the 2020 revision of the Compliance Reporting Post Approval Requirements. No pre-construction or construction phase compliance reports are required under this revision</p> <p>b) No incident reported within this audit period</p> <p>c) Independent Audit No. 1, 2 and 3 were submitted to the Department accordingly</p> <p>d) No direction from the Department within this audit period.</p> <p>The CEMP and sub-plans were updated during this audit period, and the auditees made the necessary submissions of the revised management plans to the Certifier on 19/07/2023 and to the Department on 28/07/2023.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<p>Richard Crookes Constructions, Rev 7, 5/07/2023 – (general review and update)</p> <ul style="list-style-type: none"> <li>Construction Waste Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 19/07/2023 – General review and update Appendix C</li> <li>Construction Soil and Water Management Sub Plan Rev 4 July 2023 by RCC</li> <li>Construction Hazardous Material Management Plan Rev 2, July 2023 by RCC</li> <li>Flood Emergency Response Plan Rev 3 19/07/2023, Molino Stewart</li> </ul> <p>Community Communication Strategy – Kingscliff High School, Rev 2, 22/06/2023 by SINSW</p> <p>Letter 13/07/2023 SINSW-DPE re: Submission of CCS to DPE</p>		
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>Letter 08/05/2023 SINSW-DPE re: Notification of review is being undertaken of strategies, plans and programs</p> <p>General Correspondence 8/05/2023 MBBG-Certifier re: Submission of notification of review is being undertaken of strategies, plans and programs to Certifier</p> <p>Submission of updated CEMP and sub-plans to Certifier 19/07/2023</p> <p>Submission of updated CEMP and sub-plans to Department 27/07/2023</p> <p>Post Approval (DOE Portal) submission of CEMP and sub-plans</p> <p>The following plans were updated during the audit period:</p> <ul style="list-style-type: none"> <li>Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5 July 2023 – general review and update</li> <li>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 12, 5/07/2023 – Review of management plan</li> <li>Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023 – (general review and update)</li> <li>Construction Waste Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 19/07/2023 – General review and update Appendix C</li> <li>Construction Soil and Water Management Sub Plan Rev 4 July 2023 by RCC</li> <li>Construction Hazardous Material Management Plan Rev 2, July 2023 by RCC</li> </ul>	<p>During this audit period, both the CEMP and sub-plans were updated. The revised management plans were submitted to the Department on 28/07/2023 and to the Certifier on 19/07/2023.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<ul style="list-style-type: none"> <li>Construction Worker Transportation Strategy Rev 3, July 2023</li> <li>Flood Emergency Response Plan Rev 3 19/07/2023, Molino Stewart</li> </ul>		
<b>Compliance Reporting</b>				
A36	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements.	Compliance Reporting Post Approval Requirements (2020) Letter INSW to DPE, DOC21/1323432, 14/12/2021	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
<b>PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION</b>				
<b>Notification of Commencement</b>				
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 14/12/2021 SINSW- DPE, DOC21/1323432, re: Notification of commencement of physical work – 20 Dec 2021	The Notice of Commencement of physical work was submitted on 14/12/2021 to the Department, and the work is scheduled to occur on 20/12/22.  The notification was done within the required timeframe set in this condition.	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 07/8/2023 Staging Report SSD-8744305 Upgrades to Kingscliff High School 25/07/2023 by DFP Planning Consultant	The Project was proposed to be staged in its operation. The Staging Report (July 2023) was recently submitted to the Department on 3/08/2023 and is currently awaiting the Department's approval.  Building A ground floor is scheduled to be the first stage of occupation, with an indicative timing expected in Quarter 3, 2023.  Notice of commencement for Building A is not covered by this audit period.	Not triggered
<b>Certified Drawings</b>				
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.	Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021  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	Structural design certification has been issued by ACOR Consultants and referenced in Crown Certificates.  WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Structural Design Certification letter – Building O (CAPA), ACOR Consultants, BR210028, 10/03/2022 Crown Certificate (Stage 2) CRO 22021 issued 11 March 2022 Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023 Structural Plans multiple dates by Acor Consultants P/L Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023		
<b>External Walls and Cladding</b>				
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.	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 Aconex correspondence from Certifier (BM+G) to MBB Group, BM+G-GCOR-000066, 20/12/2021 Letter from SINSW to DPE, DOC21/1342370, dated 20/12/2021 DPE lodgement record, SSD-8744305-PA-6, dated 21/12/2021 Crown Certificate (Stage 2) CRO 22021 issued 11 March 2022 External Wall System Disclosure Statement 11/07/2022, Bradford Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023	Stage 1 Crown Certificate (CRO-21085) references Installation Statement for external walls and finishes, prepared by Richard Crookes Construction. WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice. No change reported during the IA4 period.	Compliant
<b>Pre-Construction Dilapidation Report – Protection of Public Infrastructure</b>				
B5	Prior to the commencement of construction, the Applicant must: <ol style="list-style-type: none"> <li>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;</li> <li>prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non-residential) infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected;</li> <li>submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and</li> <li>provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested.</li> </ol>	Pre-construction Dilapidation Report: Public Infrastructure to Kingscliff High School – Oxford Street, RCC, KHS.01, dated 06/12/2021 Email from RCC to Tweed Shire Council, dated 06/12/2021 Aconex correspondence from RCC to Certifier (BM+G), RCC-GCOR-002380, 10/12/2021	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). The auditees advised that the Planning Secretary has not requested a copy of the Pre-Construction Dilapidation Reports. No change reported during the IA4 period.	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.	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	Structural design certification has been issued by ACOR Consultants and referenced in Crown Certificate 1, issued prior to commencement of construction.	Compliant



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		<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> <p>Crown Certificate (Stage 2) CRO 22021 issued 11 March 2022</p> <p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>Certificate of Compliance: Structural 24/04/2023 issued by Graeme Moulson &amp; Associates Engineering P/L</p> <p>Design Certificate: Structural 28/06/2023 issued by Acor Consultants P/L</p> <p>Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023</p>	<p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</p>	
<b>Pre-Construction Survey – residential Properties</b>				
B7	<p>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>	<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>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>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> <p>No change reported during the IA4 period.</p>	Compliant
B8	<p>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>	<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> <p>No change reported during the IA4 period.</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>	<p>Pre construction survey report provided to Certifier on 30/12/22 via Aconex</p>	<p>The Project has not yet commenced vibration generating works that could impact on the buildings surveyed.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>a) provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report;</li> <li>b) submit a copy of the Pre-Construction Survey Report to the Certifier; and</li> <li>c) provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested</li> </ul>	Copies of reports provided to residences at 2, 6 & 8 Cambridge Close sighted	<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 have been provided to the Certifier and affected residents prior to commencement of vibration generating works that could impact on the buildings surveyed.</p>	
<b>Community Communication Strategy</b>				
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> <ul style="list-style-type: none"> <li>a) identify people to be consulted during the design and construction phases;</li> <li>b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development;</li> <li>c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development;</li> <li>d) set out procedures and mechanisms: <ul style="list-style-type: none"> <li>i. through which the community can discuss or provide feedback to the Applicant;</li> <li>ii. through which the Applicant will respond to enquiries or feedback from the community; and</li> <li>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.</li> </ul> </li> </ul>	<p>Community Communication Strategy – Kingscliff High School, Rev 1, December 2021 by SINSW</p> <p>DPE lodgement record, SSD-8744305-PA-5, 16/12/2021</p> <p>Community Communication Strategy – Kingscliff High School, Rev 2, 22/06/2023 by SINSW</p> <p>Letter 28/06/2023 SINSW-DPE re: Submission of CCS Rev 2 to DPE</p> <p>Email 2/07/2023 DPE-SINSW re: Acknowledgement receipt of submission of CCS Rev 2</p> <p>Letter 13/07/2023 DPE-SINSW re: DPE approval for CCS Rev 2</p>	<p>The initial Community Communication Strategy was submitted to the Planning Secretary no later than 48 hours before commencement of construction.</p> <p>The Community Communication Strategy include:</p> <ul style="list-style-type: none"> <li>a. Section 4 and 5</li> <li>b. Section 6 and 7</li> <li>c. Section 4</li> <li>d. i. Section 4, 6, and 8.5</li> <li>d. ii. Section 8.5</li> <li>d. iii. Section 8.5</li> </ul> <p>The CCS has undergone an administrative update in June 2023. The document was submitted to the Department on 2/007/2023 and approved on 13/07/2023.</p>	Compliant
<b>Ecological Sustainable Development</b>				
B11	<p>Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either:</p> <ul style="list-style-type: none"> <li>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</li> <li>b) seeking approval from the Planning Secretary for an alternative certification process</li> </ul>	<p>Green Star Registration record, 07/10/2021</p> <p>Aconex correspondence from RCC to Certifier (BM+G), RCC-GCOR-002380, 22/11/2021</p>	<p>Project has registered for a Green Star Design &amp; As Built v1.3 rating. Confirmation of registration was submitted to the Certifier on 22/11/2021 (i.e. prior to commencement of construction).</p> <p>No change reported during the IA4 period.</p>	Compliant
<b>Outdoor lighting</b>				
B12	<p>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.</p>	<p>Interview with auditees, 07/08/2023</p> <p>Design Certificate: Electrical 04/05/2023 issued by Walkerbai Consulting P/L</p> <p>Crown Certificate (Stage 4) CRO 22043, Blackett Maguire + Goldsmith, issued 8 May 2023</p>	<p>Design Certificates were issued and certified by PCA BMG under Crown Certificate No. 4 and No. 5.</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Design Certificate: Electrical External 26/06/2023 issued by Walkerbai Consulting P/L  Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023		
<b>Demolition</b>				
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.	Interview with auditees, 07/08/2023  Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023 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	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).  IA4 Update: Minor internal demolition work was carried out as part of refurbishment of Building A and C.	Compliant
<b>Environmental Management Plan Requirements</b>				
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).  Note: <ul style="list-style-type: none"> <li>The <i>Environmental Management Plan Guideline</i> is available on the Planning Portal at: <a href="https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval">https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval</a></li> <li>The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</li> </ul>	Submission of updated CEMP and sub-plans to Certifier 19/07/2023  Submission of updated CEMP and sub-plans to Department 27/07/2023  Post Approval (DOE Portal) submission of CEMP and sub-plans  The following plans were updated during the audit period: <ul style="list-style-type: none"> <li>Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5 July 2023 – general review and update</li> <li>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 12, 5/07/2023 – Review of management plan</li> <li>Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023 – (general review and update)</li> <li>Construction Waste Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 4, 19/07/2023 – General review and update Appendix C</li> <li>Construction Soil and Water Management Sub Plan Rev 4 July 2023 by RCC</li> <li>Construction Hazardous Material Management Plan Rev 2, July 2023 by RCC</li> <li>Flood Emergency Response Plan Rev 3 19/07/2023, Molino Stewart</li> </ul>	The CEMP and sub-plans have been prepared and updated during this audit period, taking into consideration the Guideline's requirements for specific details outlined in the consent.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Construction Environmental Management Plan</b>				
B15	<p>Prior to the commencement of construction, the Applicant must submit a <b>Construction Environmental Management Plan (CEMP)</b> to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following:</p> <p>a) Details of:</p> <ul style="list-style-type: none"> <li>i. hours of work;</li> <li>ii. 24-hour contact details of site manager;</li> <li>iii. management of dust and odour to protect the amenity of the neighbourhood;</li> <li>iv. external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;</li> <li>v. community consultation and complaints handling as set out in the Community Communication Strategy required by condition B10;</li> </ul> <p>b) an unexpected finds protocol for contamination and associated communications procedure to ensure that potentially contaminated material is appropriately managed;</p> <p>c) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;</p> <p>d) Construction Traffic and Pedestrian Management Sub-Plan (see condition B16);</p> <p>e) Construction Noise and Vibration Management Sub-Plan (see condition B17);</p> <p>f) Construction Waste Management Sub-Plan (see condition B18);</p> <p>g) Construction Soil and Water Management Sub-Plan (see condition B19);</p> <p>h) Biodiversity Management Sub-Plan (see condition B20); and</p> <p>i) Flood Emergency Response (see condition B21);</p>	<p>Submission of updated CEMP and sub-plans to Certifier 19/07/2023</p> <p>Submission of updated CEMP and sub-plans to Department 27/07/2023</p> <p>Post Approval (DOE Portal) submission of CEMP and sub-plans</p> <p>Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5 July 2023 – general review and update</p>	<p>The CEMP has been generally prepared in line with the requirements of B15, as referenced below.</p> <p>Addressed in section 1.2 of the CEMP.</p> <p>Addressed in section 1.3 of the CEMP.</p> <p>Addressed in section 2 of the CEMP.</p> <p>Addressed in section 3 of the CEMP.</p> <p>Addressed in section 4 of the CEMP.</p> <p>Addressed in section 6 of the CEMP (and section 4.3.2 of the Aboriginal Cultural Heritage Management Plan (ACHMP)).</p> <p>Addressed in section 6 of the CEMP (and section 4.3.2 of the Aboriginal Cultural Heritage Management Plan (ACHMP)).</p> <p>Addressed in section 7 of the CEMP and the CTPMSP (see B16).</p> <p>Addressed in section 8 of the CEMP and the CNVMSP (see B17).</p> <p>Addressed in section 9 of the CEMP and the CWMS (see B18).</p> <p>Addressed in section 10 of the CEMP and the CSWMSP (see B19).</p> <p>Addressed in section 11 of the CEMP and the BMSP (see 20).</p> <p>Addressed in section 12 of the CEMP and the FERSP (see B21).</p>	Compliant
B16	<p>The <b>Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP)</b> 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:</p>	<p>Construction Traffic and Pedestrian Management Sub-Plan – Kingscliff High School, Richard Crookes Constructions, Revision 12, 5/07/2023 – Review of management plan</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 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>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person(s);</li> <li>b) be prepared in consultation with Council and TfNSW;</li> <li>c) detail:               <ul style="list-style-type: none"> <li>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;</li> <li>ii. measures to ensure the safety of vehicles and pedestrians accessing adjoining properties where shared vehicle and pedestrian access occurs;</li> <li>iii. detail heavy vehicle routes, access and parking arrangements;</li> <li>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</li> <li>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);</li> <li>vi. measures to prohibit construction access through Council's land to the east of the site (Lot 66 DP858466); and</li> <li>vii. measures to minimise truck movements between 7:45am to 9am and 2pm to 3:45pm</li> </ul> </li> </ul>		<p>Addressed on the cover page and in Appendix K 'Certificates and competencies' in the CTPMSP.</p> <p>Addressed in Appendix L of the CTPMSP.</p> <p>Addressed in sections 12 of the CTPMSP.</p> <p>Addressed in section 12.25 of the CTPMSP.</p> <p>Addressed in section 12.18 of the CTPMSP.</p> <p>Addressed in Appendix B 'Traffic Guidance Schemes' of the CTPMSP.</p> <p>Addressed in Appendix B 'Traffic Guidance Schemes' of the CTPMSP.</p> <p>Addressed in section 12.13 of the CTPMSP.</p> <p>Addressed in section 12.18 of the CTPMSP. IA3 Update CTPMSP updated to Rev 11 during audit period</p>	
B17	<p>The <b>Construction Noise and Vibration Management Sub-Plan</b> must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced noise expert;</li> <li>b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);</li> <li>c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</li> <li>d) include strategies that have been developed with the community for managing high noise generating works;</li> <li>e) describe the community consultation undertaken to develop the strategies in condition B17(d);</li> <li>f) include a complaints management system that would be implemented for the duration of the construction; and</li> <li>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.</li> </ul>	Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023 – (general review and update)	<p>The CNVMP has been generally prepared in accordance with B17, as referenced below.</p> <p>Addressed in Appendix A 'Consultant Qualification' of the CNVMSP.</p> <p>Addressed in sections 5 and 7 of the CNVMSP.</p> <p>Addressed in section 7 of the CNVMSP.</p> <p>Addressed in section 7 of the CNVMSP.</p> <p>Addressed in section 7 of the CNVMSP.</p> <p>Addressed in section 7 of the CNVMSP.</p> <p>Addressed in section 7 of the CNVMSP. IA3 Update CNVMP updated to Rev 5 during audit period</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
B18	The <b>Construction Waste Management Sub-Plan (CWMS)</b> 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 4, 19/07/2023 – General review and update Appendix C	The CWMS 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 CWMS.	
	b) information regarding the recycling and disposal locations; and		Addressed in section 5.5 of the CWMS.	
	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. IA3 Update CWMS updated to Rev 3 during audit period	
B19	The Applicant must prepare a <b>Construction Soil and Water Management Sub-Plan (CSWMS)</b> and the plan must address, but not be limited to the following:	Construction Soil and Water Management Sub Plan Rev 4 13 July 2023 by RCC	The CSWMS 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 CSWMS.	
	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 CSWMS.	
	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 CSWMS.	
	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;		Addressed in Appendix C 'Acid Sulphate Soils Management Plan Excerpt (Douglas Partners, 2021)' of the CSWMS.	
	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);		Addressed in Appendix A 'ESCP Drawing' of the CSWMS.	
	f) detail all off-site flows from the site; and		Addressed in section 4-6 of the CSWMS.	
	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		Addressed in section 6.3 and Appendix A 'ESCP Drawing' of the CSWMS. IA3 Update CSWMS updated to Rev 4 during audit period	
B20	The <b>Biodiversity Management Sub-Plan (BMS)</b> must address, but not be limited to, the following:	Biodiversity Management Sub-Plan – Kingscliff High School Upgrade, Kleinfelder, Rev 2.0, 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  Pre-Clearing Report, Annika Hallinan, 11/03/2022  Email Correspondence re Bush Curlew nest on site, 15/01/2023  No update in this audit period.	The BMS has been generally prepared in accordance with B20, as referenced below.	Compliant
	a) be prepared by a suitably qualified and experienced person/s;		Addressed in Appendix A 'Kevin Wormington CV' of the BMS.	
	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;		Addressed in section 3 of the BMS.	
	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.		Addressed in section 3 of the BMS. No change reported during audit period (IA4)	

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B21	The <b>Flood Emergency Response Sub-Plan (FERSP)</b> must address, but not be limited to, the following:	Flood Emergency Response Sub-Plan – Kingscliff High School, Molino Stewart, Rev 2.0, 02/12/2021	The FERSP has been generally prepared in accordance with B21, as referenced below.	Compliant
	a) be prepared by a suitably qualified and experienced person(s);	Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021	Addressed in Appendix 1 'Curriculum Vitae' of the FERSP.	
	b) address the provisions of the Floodplain Risk Management Guidelines (EESG);	DPE lodgement record, SSD-8744305-PA-4, 16/12/2021	Addressed in sections 2 through 6 of the FERSP.	
	c) include details of	Flood Emergency Response Sub-Plan – Kingscliff High School, Molino Stewart, Rev 3.0, 03/05/22	-	
	i. the flood emergency responses for both construction phases of the development;	Letter from DPE to SINSW dated 19/05/22 advising receipt of Rev 3 of the FERP	Addressed in section 6 of the FERSP.	
	ii. predicted flood levels;	Flood Emergency Response Plan Rev 3 19/07/2023, Molino Stewart	Addressed in sections 4.4, 4.5 and 5.2 of the FERSP.	
	iii. flood warning time and flood notification;		Addressed in section 5.3 and 5.4 of the FERSP.	
	iv. assembly points and evacuation routes;		Addressed in sections 5 and 6 of the FERSP.	
	v. evacuation and refuge protocols; and		Addressed in section 6 of the FERSP.	
	vi. awareness training for employees and contractors, and users/visitors.		Addressed in Appendix 1 Curriculum Vitae' of the FERSP. No change reported during this audit period (IA4)	
B22	A <b>Driver Code of Conduct</b> must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following: 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.	Kingscliff High School Driver Code of Conduct, Richard Crookes Construction  Delivery driver induction checklist and sign off – hard copies kept onsite (photos provided by RCC)	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.  No change reported during this audit period (IA4).	Compliant
<b>Construction Parking</b>				
B23	Prior to the commencement of construction, the Applicant must submit a <b>Construction Worker Transportation Strategy</b> 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.	Submission of updated CEMP and sub-plans to Certifier 19/07/2023  Submission of updated CEMP and sub-plans to Department 27/07/2023  Post Approval (DOE Portal) submission of CEMP and sub-plans  Construction Worker Transportation Strategy Rev 3, 7 July 2023 by RCC	Construction Worker Transportation Strategy was updated to Revision 3 on 7 July 2023 which include 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.  The updated CWTS was submitted to Certifier on 19/07/2023 and to the Department on 28/07/2023.	Compliant
<b>Operational Noise – Design of Mechanical Plant and Equipment</b>				
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	Interview with auditees, 07/08/2023  Mechanical Services Design 24/03/2023 by ACOR Consultants P/L  Design Certificate: Mechanical 27/04/2023 issued by ACOR Consultants P/L	Mechanical Services Design and Plans were issued by ACOR Consultant which were certified by BMG under Crown Certificates No. 4 and No. 5.  WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	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.	Crown Certificate (Stage 4), CRO-21085, Blackett Maguire + Goldsmith, 08/05/2023  Mechanical Services Plans multiple dates, ACOR Consultants P/L  Crown Certificate 5, CRO-21085, Blackett Maguire + Goldsmith, 13/07/2023		
<b>Landscaping</b>				
B25	<p>Prior to the commencement of landscaping works, the Applicant must submit a revised <b>Landscaping Plan</b> to the Certifier. The plan must be generally consistent with the plan submitted with the Response to Submissions but amended to:</p> <ul style="list-style-type: none"> <li>a) incorporate additional plants of local species as follows: <ul style="list-style-type: none"> <li>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;</li> <li>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</li> <li>iii. no environmental weed species;</li> </ul> </li> <li>b) reflect any changes required to accommodate water quality measures proposed around the reconfigured car park; and</li> <li>c) comply with the recommendations of the Bushfire Assessment Report prepared by Cool Burn Fire and Ecology dated 21 July 2021</li> </ul>	<p>Interview with auditees, 07/08/2023</p> <p>Design Certificate :Landscaping (Building) 12/04/2023 Black Beetle P/L</p> <p>Crown Certificate (Stage 4), CRO-21085, Blackett Maguire + Goldsmith, 08/05/2023</p> <p>Landscaping Plans multiple dates Black Beetle P/L</p> <p>Design Certificate :Landscaping 30/06/2023 Black Beetle P/L</p> <p>Crown Certificate 5, CRO-21085, Blackett Maguire + Goldsmith, 13/07/2023</p>	<p>Design Certificates were issued by Black Beetle P/L which were certified by BMG under Crown Certificates No. 4 and No. 5.</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</p>	Compliant
<b>Operational Waste Storage and Processing</b>				
B26	<p>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:</p> <ul style="list-style-type: none"> <li>a) is constructed using solid non-combustible materials;</li> <li>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;</li> <li>c) includes a hot and cold water supply with a hose through a centralised mixing valve;</li> <li>d) is naturally ventilated or an air handling exhaust system must be in place; and</li> <li>e) includes signage to clearly describe the types of materials that can be deposited into recycling bins and general garbage bins.</li> </ul>	<p>Interview with auditees, 07/08/2023</p> <p>General Correspondence 16/05/2023 RCC-Bickerton Masters Architecture re: assessment of design for waste collection area</p>	<p>Construction of waste storage and processing areas is yet to commence. We consider it is the role of the Principal Certifier to ensure compliance with this condition</p> <p>IA4 Update: No change reported during audit period.</p>	Not triggered
<b>Intersection upgrade works</b>				
B27	<p>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.</p>	<p>Interview with auditees, 07/08/2023</p> <p>Application for Driveway Access to Property dated 21/03/2023 submitted by RCC to Tweed Shire Council</p> <p>Email 22/05/2023 Tweed Shire Council-RCC re: Council requesting for documentation in relation to Driveway Application</p>	<p>RCC Group submitted a Driveway Application to Tweed Shire with corresponding plans.</p> <p>Works not yet commenced, still awaiting approval from Council.</p>	Not triggered



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>Note:</p> <ul style="list-style-type: none"> <li>Approval must be obtained for roadworks under section 138 of the Roads Act 1993.</li> <li>All costs associated with the proposed road and pathway upgrade works must be borne by the Applicant.</li> <li>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.</li> </ul>	<p>Email 24/05/2023 RCC-Tweed Shire Council re: Submission of Bitzios KHS Pedestrian Infrastructure Report and S138 Application for Driveway Access to Property</p> <p>Letter 25/05/2023 Bitzios Consulting-MBB re: KHS Expansion Modification Application Pedestrian Infrastructure Works</p>		
<b>Oxford Street Signposting and Line Marking</b>				
B28	<p>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.</p> <p>Note:</p> <ul style="list-style-type: none"> <li>Approval must be obtained for roadworks under section 138 of the Roads Act 1993.</li> <li>All costs associated with the proposed road and pathway upgrade works must be borne by the Applicant.</li> <li>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.</li> </ul>	<p>Interview with auditees, 07/08/2023</p> <p>Application for Driveway Access to Property dated 21/03/2023 submitted by RCC to Tweed Shire Council</p> <p>Email 22/05/2023 Tweed Shire Council-RCC re: Council requesting for documentation in relation to Driveway Application</p> <p>Email 24/05/2023 RCC-Tweed Shire Council re: Submission of Bitzios KHS Pedestrian Infrastructure Report and S138 Application for Driveway Access to Property</p> <p>Letter 25/05/2023 Bitzios Consulting-MBB re: KHS Expansion Modification Application Pedestrian Infrastructure Works</p>	<p>Expansion Modification Application Pedestrian Infrastructure Works was prepared by Bitzios Consulting which identified some deficiencies in the Traffic Impact Assessment dated 26 August 2021.</p> <p>One of the deficiencies identified concerns the pathway on eastern side of Oxford Street with 220m missing link.</p> <p>Works not yet commenced, still awaiting approval from the Council.</p>	Not triggered
<b>Pedestrian Infrastructure Works</b>				
B29	<p>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.</p> <p>Note:</p> <ul style="list-style-type: none"> <li>Approval must be obtained for roadworks under section 138 of the Roads Act 1993.</li> <li>All costs associated with the proposed road and pathway upgrade works must be borne by the Applicant.</li> <li>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</li> </ul>	<p>Interview with auditees, 07/08/2023</p> <p>Application for Driveway Access to Property dated 21/03/2023 submitted by RCC to Tweed Shire Council</p> <p>Email 22/05/2023 Tweed Shire Council-RCC re: Council requesting for documentation in relation to Driveway Application</p> <p>Email 24/05/2023 RCC-Tweed Shire Council re: Submission of Bitzios KHS Pedestrian Infrastructure Report and S138 Application for Driveway Access to Property</p> <p>Letter 25/05/2023 Bitzios Consulting-MBB re: KHS Expansion Modification Application Pedestrian Infrastructure Works</p>	<p>Expansion Modification Application Pedestrian Infrastructure Works was prepared by Bitzios Consulting which identified some deficiencies in the Traffic Impact Assessment dated 26 August 2021.</p> <p>Works not yet commenced, still awaiting approval from the Council.</p>	Not triggered
<b>Operations Access, Car Parking and Service Vehicle Arrangements</b>				
B30	<p>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:</p> <ol style="list-style-type: none"> <li>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</li> <li>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.</li> </ol>	<p>Interview with auditees, 07/08/2023</p> <p>Site Plan Proposed Ground A-X-0114 Rev 10 03/02/2023 by BIM</p> <p>Carpark Proposed Ground A-X-0201 Rev 9 24/05/2023 by BIM</p> <p>Email 29/05/2023 Genesis Traffic-RCC re: Design assessment and swept path assessment.</p>	<p>As per the sighted Site Plan and Carpark Plan, 99 on-site parking spaces are available/designed.</p> <p>Genesis Traffic provided the design and swept path assessment, which outlines the largest service vehicle that the loading bay can accommodate. We consider it is the role of the Principal Certifier to ensure compliance with this condition</p> <p>Works not yet commenced</p>	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Utilities, Services and Stormwater</b>				
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> <ul style="list-style-type: none"> <li>a) be designed by a suitably qualified and experienced person(s);</li> <li>b) be generally in accordance with the conceptual design in the RfS;</li> <li>c) be in accordance with applicable Australian Standards;</li> <li>d) incorporate water quality treatment measures to the reconfigured car park;</li> <li>e) be prepared to the satisfaction of Council; and</li> <li>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.</li> </ul>	<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>Aconex correspondence from Certifier (BM+G) to RCC, BM+G-GCOR-000147, 10/08/2022</p> <p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>Stormwater and Drainage Works Determination No. SWD21/0523, 22/03/2022, Tweed Shire Council</p> <p>Crown Certificate 5, CRO-21085, Blackett Maguire + Goldsmith, 13/07/2023</p>	<p>Civil Design Certification, including stormwater drainage drawings, including in Crown Certificate (Stage 1 and 5).</p> <p>Stormwater and Drainage Works Determination was issued by Tweed Shire Council on 22/02/2023.</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</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"> <li>• 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.</li> <li>• 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</li> </ul>	<p>Interview with auditees, 07/08/2023</p> <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>Tweed Council section 68 approval dated 22/3/22. See Council approval in folder.</p> <p>Stormwater and Drainage Works Determination No. SWD21/0523, 22/03/2022, Tweed Shire Council</p> <p>Crown Certificate 5, CRO-21085, Blackett Maguire + Goldsmith, 13/07/2023</p>	<p>Stormwater and Drainage Works Determination was issued by Tweed Shire Council on 22/02/2023.</p> <p>Section 68 permit approved by Tweed Shire Council.</p> <p>WolfPeak considers that it is the role of the Certifier or other authority / expert to verify compliance with this condition and has marked this requirement as compliant on the basis of their assessment or advice.</p>	Compliant
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, 07/08/2023</p> <p>Tweed Council section 68 approval dated 22/3/22</p> <p>Stormwater and Drainage Works Determination No. SWD21/0523, 22/03/2022, Tweed Shire Council</p> <p>Crown Certificate 5, CRO-21085, Blackett Maguire + Goldsmith, 13/07/2023</p>	<p>Stormwater and Drainage Works Determination was issued by Tweed Shire Council on 22/02/2023.</p> <p>Section 68 permit approved by Tweed Shire Council.</p>	Compliant
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"> <li>• Council advises that: <ul style="list-style-type: none"> <li>○ 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</li> </ul> </li> </ul>	<p>Various reports regarding service identification, including from Downunder Locations</p> <p>Numerous subsurface infrastructure maps sighted</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> <p>No change reported during audit period (IA4).</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p><i>fee. The arrangements and costs associated with any adjustment to water and wastewater infrastructure shall be borne in full by the applicant/developer.</i></p> <ul style="list-style-type: none"> <li>○ <i>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.</i></li> <li>○ <i>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. The plan shall also include details on any sewer diversion or bypass works including emergency response provisions in maintaining live sewer flows.</i></li> <li>○ <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></li> <li>○ <i>an approved pre-treatment 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></li> <li>○ <i>a Section 306 application under the Water Management Act 2000 will need to be lodged prior to the commencement of works.</i></li> </ul>			
<b>Hazardous Materials Management Plan</b>				
B35	<p>Prior to the commencement of construction, the Applicant is required to submit a <b>Hazardous Materials Management Plan</b> to the Certifier. The report must:</p> <ul style="list-style-type: none"> <li>a) 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;</li> <li>b) provide details of management of risks associated during demolition work and for any remaining in-situ hazardous materials located at the site; and</li> <li>c) comply with the relevant NSW Legislation, Codes and Practice and Australian Standards.</li> </ul>	<p>Construction Hazardous Material Management Plan (CHMMP) Rev2, 19 July 2023 by RCC</p> <p>Submission of updated CEMP and sub-plans to Certifier 19/07/2023</p> <p>Submission of updated CEMP and sub-plans to Department 27/07/2023</p> <p>Post Approval (DOE Portal) submission of CEMP and sub-plans</p>	<p>Construction Hazardous Material Management Plan (CHMMP) was updated on 19/07/2023 by RCC which relates to general review and training.</p> <p>The updated CHMMP version 2 was</p> <p>Table 1 of HMMP demonstrates compliance with requirements of a-c HMMP has been prepared and submitted to Certifier as per condition.</p> <p>The HMMP was submitted to the Certifier on 19/07/2023.</p>	Compliant
<b>Dewatering Management Plan</b>				
B36	<p>Prior to the commencement of construction, a <b>Dewatering Management Plan</b> is to be prepared by a suitably qualified and experienced person and submitted to the Certifier that:</p> <ul style="list-style-type: none"> <li>a) considers Council's Dewatering in the Tweed Guideline;</li> <li>b) meets the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZAG 2018);</li> <li>c) includes site plans which indicate the extent of the excavation area and estimated zone of influence of the dewatering activity relative to any</li> </ul>	<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> <p>The Dewatering Management Plan was reviewed but not updated.</p> <p>IA4 Update: No change reported during audit period.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>adjoining buildings together with an assessment of any impacts likely to occur to any adjoining buildings as a result of the dewatering activities;</p> <p>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;</p> <p>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;</p> <p>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</p> <p>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>			
<b>Contamination</b>				
B37	<p>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:</p> <p>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</p> <p>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</p>	<p>Pre Demolition Testing Report (undated) by Env Solutions (reviewed by certified consultant Joe Pedicini)</p> <p>Interview with auditees, 07/08/2023</p>	<p>Pre-Demolition Testing Report (undated) by Env Solutions (reviewed by certified consultant Joe Pedicini) indicates that required testing was undertaken on 27/7/21 and that no OCP's were identified in the samples taken from under the slab.</p> <p>No slab required to be removed during demolition work in Admin A area during audit period.</p> <p>IA4 Update: No change reported during audit period.</p>	Compliant
B38	<p>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</p>	<p>Pre-Demolition Testing Report (undated) by Env Solutions (reviewed by certified consultant Joe Pedicini)</p> <p>Interview with auditees, 07/08/2023</p>	<p>No OCPs identified in Pre-Demolition Testing Report (undated) by Env Solutions (reviewed by certified consultant Joe Pedicini)</p> <p>IA4 Update: No change reported during audit period.</p>	Not triggered
B39	<p>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.</p>	<p>Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 3, 09/12/2021</p> <p>Pre-Demolition Testing Report (undated) by Env Solutions (reviewed by certified consultant Joe Pedicini)</p> <p>No contaminants have been identified in soils on the site.</p> <p>HAZMAT register maintained for existing buildings and any works required on these will be managed in accordance with the HMMP</p> <p>Interview with auditees, 07/08/2023</p>	<p>Contamination to be managed in line with unexpected finds process included in Section 5 of the Project CEMP.</p> <p>IA4 Update: The auditees advised that no unexpected contamination finds have been identified on the Project to date.</p>	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>PART C DURING CONSTRUCTION</b>				
<b>Site Notice</b>				
C1	<p>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:</p> <ul style="list-style-type: none"> <li>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;</li> <li>b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period;</li> <li>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</li> <li>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.</li> </ul>	<p>Site inspection 07/08/2023</p>	<p>A site notice was observed displayed at the entry point to the construction site on Oxford Street (see site photos in Appendix D). The notice meets the requirements of C1.</p>	Compliant
<b>Operation of Plant and Equipment</b>				
C2	<p>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.</p>	<p>Equipment Induction – Excavator, Hammertech system output</p> <p>Site inspection and interview with auditees, 07/08/2023</p> <p>Yellow stickers on plant to say 'inducted'. Hammertech Equipment Induction Skid Steer Loader [Demolition]. Used by Demex.</p> <p>Forklift induction dated 22/2/23, Telehandler 11/1/23 sighted. Numerous other records visible in register</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>IA3 Update: Hammertech system records continued to be maintained during audit period.</p>	Compliant
<b>Demolition</b>				
C3	<p>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.</p>	<p>Demolition Management Plan Kingscliff High School, PF 879, Demex, Rev 3.0, 13/10/2021</p> <p>Compliance Statement – Demolition, Demex, 01/12/2021</p> <p>Interview and site inspection with auditees 07/08/2023</p> <p>Hammertech Record and Photos of workshop sighted</p>	<p>High Risk Workshop conducted on 17/02/2023 in relation to demolition works at Admin area.</p> <p>Hammertech Record and Photos of workshop sighted that provides information to minor internal demolition during audit period.</p>	Compliant
<b>Construction Hours</b>				
C4	<p>Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:</p> <ul style="list-style-type: none"> <li>a) between 7am and 6pm, Mondays to Fridays inclusive; and</li> <li>b) between 8am and 1pm, Saturdays.</li> </ul> <p>No work may be carried out on Sundays or public holidays.</p>	<p>Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023</p> <p>Site Induction Presentation - Kingscliff Public &amp; High School Redevelopment, Richard Crookes Constructions, 23/05/2022</p> <p>Interview and site inspection with auditees 07/08/2023</p> <p>Complaint Register July 2023</p>	<p>Hours of work are included in Section 6.3 of the CNVMSP and mentioned in the site induction and pre-start notice board.</p> <p><i>Note: Complaints register includes complaint made regarding worker talking loudly prior to arriving on site before 7am on 29/11/22. This is not considered to be construction work per se. Hammertech Record of Toolbox undertaken in response to the complaint was sighted.</i></p> <p>No OOHW within the audit period, no complaints.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
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.	Interview with auditees 07/08/2023 Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023 Complaints Register July 2023	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. No OOHW reported during 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 7, 5/07/2023 Interview with auditees, 07/08/2023	Hours of work are included in Section 6.3 of the CNVMSP. The auditees advised that no OOHW 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 07/08/2023	The auditees advised that no OOHW 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 7, 5/07/2023 Complaints Register July 2023 Interview with auditees 07/08/2023	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. Screw piers have been used instead of driven piles.	Not triggered
<b>Implementation of Management Plans</b>				
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	A review of selected mitigation measures from the following Sub-Plans was undertaken during the site inspection site inspection and interview with auditees on 5/07/2023: <ul style="list-style-type: none"> <li>CEMP Rev 7 (5 July 2023)</li> <li>CTPMSP Rev 12 (5 July 2023)</li> <li>CNVMP Rev 7 (5 July 2023)</li> <li>CWMP Rev 4 (19 July 2023)</li> <li>Flood Emergency Plan Rev 3 (19 July 2023)</li> </ul> Hammertech records for 24/2/2023 and 27/02/2023 Environmental Inspections Sighted.	Regular weekly environmental inspection by contractor provides evidence of self-monitoring of environmental mitigation measures. The review of the implementation of selected measures from a number of sub-plans indicated overall compliance with this requirement. Details included against relevant CoA in this Appendix A and photo evidence in Appendix D	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Construction Traffic</b>				
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 12, 5/07/2023  Kingscliff High School Driver Code of Conduct, Richard Crookes Construction  Site inspection 07/08/2023	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 to date.	Compliant
<b>Hoarding Requirements</b>				
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.	Complaints Register, July 2023  Appendix D  Site inspection, 07/08/2023	No advertising or graffiti was observed during the site inspection.  No complaints have been received relating to advertising or graffiti on the Project.	Compliant
<b>No Obstruction of Public Way</b>				
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 12, 5/07/2023  Complaints Register, July 2022  Site inspection 07/08/2023	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 to date.	Compliant
<b>Construction Noise Limits</b>				
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 5, January 2023  Site Induction Presentation - Kingscliff Public & High School Redevelopment, Richard Crookes Constructions, May 2022  Complaints Register, July 2023  Standard hours being implemented. No complaints to date regarding out of hours work  Noise and vibration monitoring reports by Env Solutions dated 22/3/22, 14/4/22 and Noise Monitoring Compliance Report December 2022 (ENV Solutions)  Latest noise monitoring performed was in Feb – March 2023	Noise monitoring was undertaken in Feb – March 2023. The noise monitoring report (ENV Solutions 30 May 2023) has not assessed compliance against the NML but only applied the highly noise affected level of 75dB(A) as the criteria to assess compliance. This means that all reasonable and feasible mitigation measures may not have been actively identified by the project to achieve the relevant NMLs (which are much lower).  Notwithstanding the above it is noted that noise impacts are managed through liaison during weekly meetings between RCC and the School (e.g. limiting high noise activities during examination periods) and that no complaints regarding noise have been received from the community.  It was noted during the site inspection that a radio being used by site personnel was very audible (this was turned down during the course of the inspection)  <b>Observation:</b>  <b>If any future noise monitoring is conducted on the project it should assess compliance with the relevant NMLs in section 5.3 of the CNVMP (not the highly noise affected level only), and if any exceedances are identified the project team should try and identify any additional feasible and reasonable noise mitigation measures that could be adopted in an effort to achieve compliance (noting that there may not any additional reasonable and feasible measures available to be applied under the circumstances).</b>	Observation

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			<p><b>Observation:</b></p> <p><b>Suggest specific toolboxes be undertaken targeting minimizing nuisance noise through measures such as turning radios down or off, increased awareness of school learning activities nearby</b></p>	
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.	<p>Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023</p> <p>Kingscliff High School Driver Code of Conduct, Richard Crookes Construction</p> <p>Complaints Register July 2023</p>	<p>Requirement included in Section 7 of the CNVMSP and addressed in Site Induction and Driver Code of Conduct.</p> <p>No complaints regarding construction vehicles arriving on site outside of hours have been received in relation to the Project.</p>	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.	<p>Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023</p> <p>Complaints update, July 2023</p> <p>Site Inspection, 07/08/2023</p>	<p>The requirement to use quackers is included in Section 7 of the CNVMSP.</p> <p>No noise complaints regarding mobile plant or vehicles have been received in relation to the Project.</p> <p>An audible alarm was heard on the scissor lift during the site inspection however this is a safe operating requirement.</p>	Compliant
<b>Vibration Criteria</b>				
C16	<p>Vibration caused by construction at any residence or structure outside the site must be limited to:</p> <ul style="list-style-type: none"> <li>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</li> <li>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).</li> </ul>	<p>Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023</p> <p>KHS Environmental Monitoring – Noise Vibration Monitoring Compliance Report Feb-March 2023, 30/05/2023 by ENV Services</p> <p>Vibration monitoring reports for 22/3/22 and 14/4/22</p> <p>Site Inspection 07/08/2023</p> <p>ENV solutions Report dated Feb 2023</p>	<p>The Noise Vibration Monitoring Compliance Report prepared by ENV Services, dated 30/05/2023, noted that vibration criteria were exceeded on a number of occasions however these are considered to have mostly been caused by factors other than construction activities. It is also noted that the vibration monitoring was carried out on the project site itself rather than at the nearest residence and therefore likely overstates the vibration levels recorded.</p> <p>No complaints regarding excessive vibration have been made by the community during the audit period.</p>	Compliant
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>KHS Environmental Monitoring – Noise Vibration Monitoring Compliance Report Feb-March 2023, 30/05/2023 by ENV Services</p> <p>Site inspection 07/08/2023</p>	During the audit period a vibratory compactor was used to compact fill near Admin A building but the distance to nearest residence is much greater than 30m.	Compliant
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 7, 5 July 2023</p> <p>Construction Noise and Vibration Management Sub-Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5/07/2023</p> <p>KHS Environmental Monitoring – Noise Vibration Monitoring Compliance Report Feb-March 2023, 30/05/2023 by ENV Services</p> <p>Site Inspection with auditees, 07/08/2023</p> <p>Env Solutions report March 2023</p>	<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.</p> <p>IA4 Update: No change reported during audit period.</p>	Compliant



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Tree Protection</b>				
C19	<p>For the duration of the construction works:</p> <ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>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</li> <li>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.</li> </ul>	<p>Biodiversity Management Sub-Plan – Kingscliff High School Upgrade, Kleinfelder, Rev 2.0, 09/12/2021</p> <p>Site Induction Presentation - Kingscliff Public &amp; High School Redevelopment, Richard Crookes Constructions</p> <p>Site Inspection 7/08/2023</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 D).</p> <p>Trees being retained have been fenced with ATF and sign posted to protect them during construction works (see site photos in Appendix D).</p>	Compliant
<b>Air Quality</b>				
C20	<p>The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.</p>	<p>Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5 July 2023</p> <p>Complaints Register July 2023</p> <p>Site Inspection 07/08/2023</p>	<p>Section 2 of the Project's CEMP includes measures to manage dust and odour during construction.</p> <p>IA4 Update: No dust related complaints reported during audit period.</p> <p>Street sweeper used when required. Oxford Street and roads adjacent to the School observed as clean.</p>	Compliant
C21	<p>During construction, the Applicant must ensure that:</p> <ul style="list-style-type: none"> <li>a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust;</li> <li>b) all trucks entering or leaving the site with loads have their loads covered;</li> <li>c) trucks associated with the development do not track dirt onto the public road network;</li> <li>d) public roads used by these trucks are kept clean; and</li> <li>e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</li> </ul>	<p>Construction Environmental Management Plan – Kingscliff High School Upgrade, Richard Crookes Constructions, Rev 7, 5 July 2023</p> <p>Complaints Register update July 2023</p> <p>Site Inspection 07/08/2023</p>	<p>Section 2 of the Project's CEMP includes measures to managed dust and odour during construction.</p> <p>IA4 Update: No dust related complaints reported during audit period Street sweeper used when required. Oxford Street and roads adjacent to the School observed as clean. The site is currently predominately covered with existing hardstand (asphalt).</p>	Compliant
<b>Imported and Exported Fill</b>				
C22	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>a) 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;</li> <li>b) keep accurate records of the volume and type of fill to be used;</li> <li>c) make these records available to the Certifier upon request;</li> </ul>	<p>Env Solutions waste classification advice dated 29/6/22</p> <p>KHS site won material stockpiled in the KHS Library area while we were completing retaining walls &amp; lift pits. Geotech Report confirms site won material acceptable to be used as fill material.</p>	<p>Waste Tracking Register used to track the importation and exportation of fill material and waste materials and includes waste export entries up to December 2022 and fill importation entries to February 2023 with the required records and information being kept in the register.</p>	Compliant

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>d) 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</p> <p>e) 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>	<p>Imported Roadbase material used for the Library raft slab also used as a capping layer to seal the CAPA pad.</p> <p>PASS classified as VENM by Environmental Solutions per advice dated 29/6/22 and transported to licensed facility in Qld.</p> <p>Imported roadbase material sourced from Boral Quarry in Burleigh Qld during audit period for use as engineered fill under slab and pads</p> <p>Dockets for imported Roadbase material from Boral Quarry sighted.</p> <p>Waste Tracking Register</p> <p>Site Inspection and interview 07/08/2023</p>		
<b>Disposal of Seepage and Stormwater</b>				
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>Section 68 permit issued by TSC dated 22/3/22</p> <p>Site Inspection 07/8/2023</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>IA4 Update: No dewatering has occurred during audit period.</p>	Not triggered
<b>Emergency Management</b>				
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 &amp; 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>Evacuation plan on Pre-Start Notice board and in site induction and drill planned for 8/9/22 in conjunction with School</p> <p>Evacuation Drill - Mock Evaluation &amp; Emergency Roles &amp; Responsibilities, performed 31/05/2023 by RCC</p> <p>KHS Emergency Evacuation Plan – Site Compound Rev 10, 03/02/2023</p>	<p>Emergency assembly points and evacuation routes are included in the Project induction presentation.</p> <p>IA4 Update: Evacuation drill records for 2/2/2023 sighted.</p>	Compliant
<b>Aboriginal Heritage</b>				
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, 07/08/2023</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

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
			IA4 Update: No unexpected Aboriginal heritage finds identified during audit period.	
C26	Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by EMM Consulting dated April 2021.	Kingscliff High School Aboriginal Cultural Heritage Management Plan, EMM, Version 4, 17/11/2021 Cultural heritage inductions 8/4/22 and 27/7/22 Interview with auditees, 07/08/2023	Additional cultural heritage inductions and activities were undertaken during the previous audit period consistent with the recommendations of the EMM report dated April 2021 during periods of ground disturbance.  Significant disturbance of the original soil profile was completed prior to the current audit period and therefore no additional cultural heritage inductions have been required under section 4.3.1 of ACHMP.	Compliant
<b>Unexpected Finds Protocol – Aboriginal Heritage</b>				
C27	In the event that surface disturbance identifies a new Aboriginal object: a) all works must halt in the immediate area to prevent any further impacts to the object(s); b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects; c) 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; d) 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 e) 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 7, 05/07/2023 Interview with auditees, 07/08/2023	The auditees advised that no unexpected Aboriginal heritage finds were identified during the audit period.	Not triggered
<b>Unexpected Finds Protocol– Historic Heritage</b>				
C28	If any unexpected archaeological relics are uncovered during the work, then: 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, 07/08/2023	Interview and site inspection with auditees on 07/08/2023 indicate that this requirement not triggered.	Not triggered
<b>Waste Storage and Processing</b>				
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 Complaints Register July 2023 Site Inspection 07/08/2023	Waste storage bins were sighted onsite during the inspection conducted 07/08/2023. See site photos in Appendix D.  No waste was observed leaving site onto neighbouring public or private properties and no complaints have been made regarding this.	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).	Waste tracking register 31/8/22 Env Solutions waste classification advice dated 29/6/22 Env Solutions waste classification advice dated 31/08/2022 Site Inspection 07/08/2023	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

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
		Waste register with classification current to 06/06/2023		
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.	Site Inspection 07/08/2023	Concrete washout trays used to manage concrete rinse water on site (Appendix D).	Compliant
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 register with classification current to 06/06/2023 Site Inspection 07/08/2023	Waste Tracking Register used to track the importation and exportation of fill material and waste materials and includes waste export entries up to June 2023 with the required records and information being kept in the register.	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, 07/08/2023	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).  IA4 Update: No change reported during audit period.	Not triggered
<b>Hazardous Materials</b>				
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, 07/08/2023	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>  IA4 Update: No change reported during audit period.	Not triggered
<b>Outdoor Lighting</b>				
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	Complaints Register July 2023 No significant external lighting in use for construction Site Inspection 07/08/2023	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.  The evidence provided indicates this condition is being satisfied via the building certification process. We consider it is the role of the Principal Certifier to ensure compliance with this condition.  IA4 Update: No complaints relating to external lighting reported during the audit period. Temporary lighting provided to staff car park.	Compliant
<b>Independent Environmental Audit</b>				
C36	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Letter from DPE to SINSW dated 05/09/2022 approves Steve Fermio as Independent Auditor	The audit team was approved by the Department prior to commencing this Independent Audit.	Compliant
C37	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.	IAPAR 2020 Interview with auditees, 07/08/2023	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, 07/08/2023	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

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
C39	In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must: <ul style="list-style-type: none"> <li>a) review and respond to each Independent Audit Report prepared under condition C37 of this consent, or condition C38 where notice is given;</li> <li>b) submit the response to the Planning Secretary; and</li> <li>c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary.</li> </ul>	IA2 Report dated 21/10/2022, WolfPeak SINSW letter and response to IA2 report to DPE dated 24/10/2022 IA3 Report dated 24/04/2023, WolfPeak SINSW letter submission of IA3 Report and response to DPE dated 28/04/2023	The Proponent response to the IA3 was undertaken as per these requirements and timeframes.	Compliant
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.	IA2 Report dated 21/10/2022 SINSW letter and response to IA2 report to DPE dated 24/10/2022 IA3 Report dated 24/04/2023, WolfPeak SINSW letter submission of IA3 Report and response to DPE dated 28/04/2023	As noted above.	Compliant
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 and interview with auditees, 07/08/2023	The Project is currently under construction.	Not triggered
<b>Operation Readiness Work</b>				
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"> <li>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);</li> <li>b) the maximum number of staff to be involved in operational readiness work on site at any one time;</li> <li>c) arrangements to ensure the safety of school staff on the site, including how: <ul style="list-style-type: none"> <li>i. areas to be used for operational readiness work will be clearly and securely separated from the areas of the site still under construction;</li> <li>ii. pedestrian access to and within the site will be managed to ensure no conflict with construction vehicle movements; and</li> </ul> </li> <li>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</li> </ul>	Interview with auditees, 07/08/2023	Operation of Building A scheduled for September 2023. <i>Note that submission of relevant Operational Readiness related details will be triggered in relation to the operation of Building A (new parts) which will occur during the next audit period</i>	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"> <li>a) no more than 15 staff are involved in operational readiness work;</li> <li>b) no students or parents are permitted; and</li> <li>c) the Applicant has implemented appropriate arrangements to ensure the safety of school staff.</li> </ul>	Refer to C42.	Refer to C42.	Not triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>PART D PRIOR TO OCCUPATION OR COMMENCEMENT OF USE</b>				
<b>Notification of Occupation</b>				
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
<b>External Walls and Cladding</b>				
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.	<p>Crown Certificate (Stage 1), CRO-21085, Blackett Maguire + Goldsmith, 15/12/2021</p> <p>Installation Statement – External Walls &amp; Finishes, from Richard Crookes Construction to the Certifier (BM+G), dated 06/12/2021</p> <p>Crown Certificate (Stage 2) CRO 22021 issued 11 March 2022</p> <p>Crown Certificate (Stage 3) CRO 22043, Blackett Maguire + Goldsmith, issued 1 February 2023</p> <p>Crown Certificate (Stage 4) CRO 22043, Blackett Maguire + Goldsmith, issued 8 May 2023</p> <p>External Wall System Disclosure Statement , 11/07/2022 issued by Bickerton Masters</p> <p>Email 13/07/2023 Certifier-MBB re: Acceptance of External Wall System Disclosure Statement</p> <p>Crown Certificate 5 CRO 22043, Blackett Maguire + Goldsmith, issued 13 July 2023</p> <p>Letter 14/07/2023 SINSW-DPE re: Submission of External Wall and Cladding in accordance with D2 and D3</p> <p>Post Approval (DPE Portal) Submission of External Wall and Cladding in accordance with D2 and D3</p>	-	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
<b>Works as Executed Plans</b>				
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
<b>Warm Water Systems and Cooling Systems</b>				
D4	Prior to the commencement of operation, works-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	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.			
<b>Outdoor Lighting</b>				
D6	<p>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:</p> <ul style="list-style-type: none"> <li>a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and</li> <li>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.</li> </ul>	-	-	Not Triggered
<b>Mechanical Ventilation</b>				
D7	<p>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:</p> <ul style="list-style-type: none"> <li>a) AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and other relevant codes; and</li> <li>b) any dispensation granted by Fire and Rescue NSW</li> </ul>	-	-	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
<b>Operational Noise – Design of Mechanical Plant and Equipment</b>				
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
<b>Fire Safety Certification</b>				
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
<b>Structural Inspection Certificate</b>				
D11	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:	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>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</li> <li>b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s</li> </ul>			
<b>Compliance with Food Code</b>				
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
<b>Post-Construction Dilapidation Report – Protection of Public Infrastructure</b>				
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"> <li>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;</li> <li>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).</li> <li>c) be submitted to the Certifier;</li> <li>d) be forwarded to Council for information; and</li> <li>e) be provided to the Planning Secretary when requested.</li> </ul>	-	-	Not Triggered
<b>Repair of Public Infrastructure</b>				
D14	<p>Unless the Applicant and the relevant public authority agree otherwise, the Applicant must:</p> <ul style="list-style-type: none"> <li>a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the construction works; and/or</li> <li>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</li> <li>c) pay compensation for the damage as agreed with the owner of the public infrastructure.</li> </ul> <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
<b>Road Damage</b>				
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



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Post-Construction Survey – Residential Properties</b>				
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 to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must:</p> <ul style="list-style-type: none"> <li>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;</li> <li>b) be provided to the owner of the relevant buildings surveyed;</li> <li>c) be provided to the Certifier; and</li> <li>d) be provided to the Planning Secretary when requested.</li> <li>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.</li> </ul>	-	-	Not Triggered
<b>Intersection upgrade works</b>				
D17	<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 B27 have been completed to the satisfaction of the relevant roads authority.</p>	-	-	Not Triggered
<b>Oxford Street Signposting and Line Marking</b>				
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"> <li>• Approval must be obtained for roadworks under section 138 of the Roads Act 1993.</li> <li>• All costs associated with the proposed road and pathway upgrade works must be borne by the Applicant.</li> <li>• 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.</li> </ul>	-	-	Not Triggered
<b>Pedestrian Infrastructure Upgrade Works</b>				
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"> <li>• Approval must be obtained for roadworks under section 138 of the Roads Act 1993.</li> <li>• All costs associated with the proposed road and pathway upgrade works must be borne by the Applicant.</li> <li>• 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.</li> </ul>	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Car Parking Arrangements</b>				
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
<b>Bicycle Parking and End-of-Trip Facilities</b>				
D21	<p>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:</p> <ul style="list-style-type: none"> <li>a) the provision of a minimum 90 bicycle and scooter parking spaces;</li> <li>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;</li> <li>c) the provision of end-of-trip facilities for staff; and</li> <li>d) appropriate pedestrian and cyclist advisory signs are to be provided.</li> </ul> <p><i>Note: All works/regulatory signposting associated with the proposed development shall be at no cost to the relevant roads authority.</i></p>	-	-	Not Triggered
<b>School Zones</b>				
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	The Applicant must maintain records of all dates in relation to installing, altering and removing traffic control devices related to speed.	-	-	Not Triggered
<b>School Transport Plan</b>				
D24	<p>Prior to the commencement of operation, a <b>School Transport Plan (STP)</b>, must be submitted to the satisfaction of the Planning Secretary. The plan must:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified consultant in consultation with Council and TfNSW;</li> <li>b) include arrangements to promote the use of active and sustainable transport modes, including: <ul style="list-style-type: none"> <li>i. objectives and modes share targets (i.e., Site and land use specific, measurable and achievable and timeframes for implementation);</li> <li>ii. specific tools and actions to help achieve the objectives and mode share targets;</li> <li>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.</li> </ul> </li> <li>c) include operational transport access management arrangements, including: <ul style="list-style-type: none"> <li>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</li> </ul> </li> </ul>	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>able to access and leave the Site in a safe and efficient manner during school start and finish;</p> <ul style="list-style-type: none"> <li>ii. the location of all car parking spaces on the school campus and their allocation (i.e., staff, visitor, accessible, emergency, etc.);</li> <li>iii. the location and operational management procedures of the drop-off and pick-up parking, including staff management/traffic controller arrangements;</li> <li>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;</li> <li>v. delivery and services vehicle and bus access and management arrangements;</li> <li>vi. management of approved access arrangements;</li> <li>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;</li> <li>viii. car parking arrangements and management associated with the proposed use of school facilities by community members; and</li> </ul> <p>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</p> <p>e) a monitoring and review program, including</p> <ul style="list-style-type: none"> <li>i. a review of impacts on nearby streets and intersection, including potential queuing and school users parking on residential streets; and</li> <li>ii. consideration of measures required to address impacts in consultation with relevant stakeholders.</li> </ul>			
D25	<p>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.</p>	<p>Complaints handling Management Plan for KHS 01/03/2023 SINSW</p> <p>General Correspondence 22/03/2023 MBB-Certifier re: Submission of Complaints handling Management Plan to Certifier</p> <p>Letter 29/03/2023 SINSW-DPE re: Submission of Complaints handling Management Plan to DPE</p> <p>Email 09/03/2023 DPE-SINSW re: Acknowledgement receipt of submission of Complaints handling Management Plan</p> <p>Letter 5/04/2023 DPE-SINSW re: Acceptance of Complaints handling Management Plan</p>	-	Not Triggered
<b>Utilities and Services</b>				
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><i>Note:</i></p> <ul style="list-style-type: none"> <li>• 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"> <li>o Water: 9.18 ET @ \$11,442 = \$105,037.60</li> </ul> </li> </ul>	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	o Sewer: 15.3 ET @ \$7,400 = \$113,220.00			
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)	General Correspondence 24/03/2023 RCC-MBB re: Sewer/Stormwater Easement Plan registered with LRS	-	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
<b>Stormwater Operation and Maintenance Plan</b>				
D29	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: <ul style="list-style-type: none"> <li>a) maintenance schedule of all stormwater quality treatment devices;</li> <li>b) record and reporting details;</li> <li>c) relevant contact information; and</li> <li>d) Work Health and Safety requirements.</li> </ul>	-	-	Not Triggered
<b>Koala Offset Management Plan</b>				
D30	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 (TCCKPoM 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: <ul style="list-style-type: none"> <li>a) accurate calculation of Preferred Koala Food Tree (PKFT) offsets based on 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 (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.</li> <li>b) a suitably scaled plan showing the metes and bounds of the Koala Offset Area on site that meets the following criteria: <ul style="list-style-type: none"> <li>i. the entire quantum of calculated offsets to be delivered on site;</li> <li>ii. the offset area/s must be of adequate area to achieve a minimum 2.5-metre-wide plant spacing;</li> <li>iii. the offset area/s must be contiguous with/adjacent to existing Preferred Koala Habitat; and</li> <li>iv. the offset area/s must not conflict with any existing or approved infrastructure;</li> </ul> </li> <li>c) details of proposed revegetation to meet the offset requirements;</li> <li>d) schedule of local native plant species to be used for planting;</li> </ul>	Koala Offset Management Plan for KHS 2/05/2023 by Kleinfelder  Letter 24/05/2023 SINSW-DPE re: Submission of Koala Offset Management Plan  Email 26/05/2023 DPE-SINSW re: Acknowledgement receipt of Koala Offset Management Plan  Letter 14/06/2023 DPE-SINSW re: Acceptance of the submitted Koala Offset Management Plan  Email 10/05/2023 Tweed Council-MBB re: Council acceptance of Koala Offset Management Plan	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>e) include weed treatment methods consistent with the SEQ Ecological Restoration Framework: Manual (Chenoweth EPLA &amp; 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> <p>i. primary works - all planting, treatment of all environmental weeds, baseline monitoring and reporting;</p> <p>ii. maintenance works - supplementary planting (where required), continued treatment and control of environmental weeds, monitoring and reporting.</p> <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> <p>i. primary works phase:</p> <ul style="list-style-type: none"> <li>• 100% successful establishment of all planted stock;</li> <li>• 90% control of all environmental weeds species across the entire koala offset area/s;</li> </ul> <p>ii. maintenance works phase:</p> <ul style="list-style-type: none"> <li>• 90% successful establishment of all planted stock;</li> <li>• 90% control of all environmental weeds species across the entire across the entire koala offset area/s;</li> <li>• increased growth of all planted stock;</li> </ul> <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
<b>Signage</b>				
D32	Prior to the commencement of operation, way-finding signage and signage identifying the location of staff car parking must be installed.	-	-	Not Triggered
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
<b>Operational Waste Management Plan</b>				
D34	Prior to the commencement of operation, the Applicant must prepare a <b>Waste Management Plan</b> for the development and submit it to the Certifier. The Waste Management Plan must:	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>a) detail the type and quantity of waste to be generated during operation of the development;</li> <li>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);</li> <li>c) detail the materials to be reused or recycled, either on or off site; and</li> <li>d) include the Management and Mitigation Measures included in EIS.</li> </ul>			
<b>Contamination</b>				
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"> <li>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;</li> <li>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;</li> <li>c) include, but not be limited to:               <ul style="list-style-type: none"> <li>i. comment on the extent and nature of the remediation undertaken;</li> <li>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;</li> <li>iii. sampling and analysis plan and sampling methodology undertaken as part of the remediation;</li> <li>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;</li> <li>v. results of any validation sampling, compared to relevant guidelines/criteria;</li> <li>vi. comment on the suitability of the area for the intended land use; and</li> </ul> </li> <li>d) be submitted to the Planning Secretary for information.</li> </ul>	-	-	Not Triggered
<b>Landscaping</b>				
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
<b>Vegetation Management Plan</b>				
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"> <li>a) describe the ongoing monitoring and maintenance measures to manage landscaping and vegetation on the site;</li> <li>b) comply with the recommendations of the Bushfire Assessment Report prepared by Cool Burn Fire and Ecology dated 21 July 2021; and</li> </ul>	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<p>c) be consistent with the Applicant's Management and Mitigation Measures in the EIS.</p> <p><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></p>			
<b>Evacuation and Emergency Planning</b>				
D38	<p>Prior to the commencement of operation, a <b>Bush Fire Emergency Management and Evacuation Plan</b> 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
<b>Operational Flood Emergency Management Plan</b>				
D39	<p>Prior the commencement of the operation, a <b>Flood Emergency Management Plan</b> must be submitted to the Certifier that:</p> <p>a) is be prepared by a suitably qualified and experienced person(s);</p> <p>b) addresses the provisions of the Floodplain Risk Management Guidelines (EESG);</p> <p>c) includes details of:</p> <ol style="list-style-type: none"> <li>i. the flood emergency responses for operational phase of the development;</li> <li>ii. predicted flood levels;</li> <li>iii. flood warning time and flood notification;</li> <li>iv. assembly points and evacuation routes;</li> <li>v. evacuation and refuge protocols; and</li> <li>vi. awareness training for employees and contractors, and visitors.</li> </ol>	-	-	Not Triggered
<b>Noise Management Plan</b>				
D40	<p>Prior to the commencement of operation, a <b>Noise Management Plan</b> is to be submitted to the Certified that details how noise from onsite 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
<b>PART E POST OCCUPATION</b>				
<b>Out of Hours Event Management Plan</b>				
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> <p>a) the number of attendees, time and duration;</p> <p>b) arrival and departure times and modes of transport;</p> <p>c) where relevant, a schedule of all annual events;</p>	-	-	Not Triggered

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
	<ul style="list-style-type: none"> <li>d) measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e., public transport);</li> <li>e) details of the use of the site, where applicable, restricting use before 8am and after 10pm;</li> <li>f) measures to minimise localised traffic and parking impacts; and</li> <li>g) include measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.</li> </ul>			
E2	The Out of Hours Event Management Plan (School Use) must be implemented by the Applicant for the duration of the identified events or use.	-	-	Not Triggered
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"> <li>a) the number of attendees, time and duration;</li> <li>b) arrival and departure times and modes of transport;</li> <li>c) where relevant, a schedule of all annual events;</li> <li>d) measures to encourage non-vehicular travel to the school and promote and support the use of alternate travel modes (i.e., public transport);</li> <li>e) details of the use of the site, where applicable, restricting use before 8am and after 10pm;</li> <li>f) measures to minimise localised traffic and parking impacts; and</li> <li>g) measures to minimise noise impacts on any sensitive residential receivers, including the preparation of acoustic management plan.</li> </ul>	-	-	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
<b>Operation of Plant and Equipment</b>				
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
<b>Warm Water Systems and Cooling Systems</b>				
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
<b>Community Communication Strategy</b>				
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



Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Deliveries to the Premises</b>				
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
<b>Servicing of Waste Facilities</b>				
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
<b>Operational Noise Limits</b>				
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 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.	-	-	Not Triggered
<b>Noise Management Plan</b>				
E12	The development must be managed in accordance with the Noise Management Plan prepared under condition D40.	-	-	Not Triggered
<b>Unobstructed Driveways and Parking Areas</b>				
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
<b>School Transport Plan</b>				
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

Unique ID	Compliance requirement	Evidence collected	Independent Audit findings and recommendations	Compliance Status
<b>Ecologically Sustainable Development</b>				
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
<b>Outdoor Lighting</b>				
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
<b>Vegetation Management Plan</b>				
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
<b>Koala Offset Area Restriction</b>				
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"> <li>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.</li> <li>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. <ul style="list-style-type: none"> <li>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;</li> <li>ii. erection of any fixtures or improvements, including buildings or structures;</li> <li>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;</li> <li>iv. depositing of any fill, soil, rock, rubbish, ashes, garbage, waste or other material foreign to the protected area;</li> <li>v. keeping or permitting the entry of domestic animals or any other animals that are not indigenous to the Koala Offset Area; and</li> <li>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</li> </ul> </li> </ul>	-	-	Not Triggered

## APPENDIX B – PLANNING SECRETARY AGREEMENT OF INDEPENDENT AUDITORS



Mr Patrick Mills  
Level 10, 259 George Street  
SYDNEY NSW 2000

05/09/2022

Dear Mr Mills

### Upgrades to Kingscliff High School (SSD-8744305) Appointment of Independent Audit Team

I refer to your request (**SSD-8744305-PA-15**) for the Planning Secretary's endorsement of a suitably qualified, experience and independent audit team to conduct independent environmental audits of the Upgrades to Kingscliff High School development. Under Condition C37 of the Upgrades to Kingscliff High School consent (**SSD-8744305**) independent environmental audits are to be carried out in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020) (**IA PAR**).

The Department of Planning and Environment (**Department**) has reviewed the nominations and information you have provided against Condition C36 and the IA PAR, specifically section 3.1.

The Department is satisfied that Mr Steve Fermio is Exemplar Global as lead auditor in environmental management systems, and that all nominated persons are suitably experienced and qualified in state significant projects and have supplied declarations of independence.

Consequently, in accordance with C36 of SSD-8744305 I can advise that the Planning Secretary endorses the following persons as the audit team in the following roles:

- Mr Steve Fermio, WolfPeak, as Lead Auditor
- Ms Annabelle Tungol, WolfPeak, Auditor
- Mr Peter Hatton, WolfPeak, Auditor

Notwithstanding the endorsement of the above listed audit team, 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 Planning 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.

The Department reserves the right to request an alternate auditor or experts for any future independent environmental audits under SSD-8744305.

The independent environmental audit must satisfy Condition C37 of SSD-8744305 and be conducted in accordance with the IA PAR. Failure to do so may require revision and resubmission of the audit report.

Please ensure this correspondence is appended to the audit report.

If you wish to discuss the matter further, please contact Ania Dorocinska, Senior Compliance Officer on 02 9274 6225 or via [ania.dorocinska@planning.nsw.gov.au](mailto:ania.dorocinska@planning.nsw.gov.au).

Yours sincerely



Rob Sherry  
Team Leader Compliance - Government Projects  
Compliance

As nominee of the Planning Secretary



## APPENDIX C – CONSULTATION RECORDS



**From:** [Phil Rose](#)  
**Sent:** Monday, 24 July 2023 10:25 AM  
**To:** [Steve Fermio](#)  
**Subject:** RE: SSD - 8744305 - Kingscliff High School IA4 audit scope consultation

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Hi Steve,

Reference is made to the scope request for the Independent Environmental Audit (IEA) submitted to the department by email on 21 July 2023 as per Section 3.2 of the Independent Audits – Post Approval Requirements (May 2020).

Appreciate the opportunity to provide input into the scope of the independent Audit. After consideration, the key issue the Department would like addressed in the scope of the IEA includes; A review of the project administrative housekeeping to determine that all plans, programs and strategies required by the consent have been provided or are being addressed.

The Department has no additional recommendations regarding consultation with other agencies for this audit.

Please conduct the audit in accordance with the Independent Audit – Post Approval Requirements (May 2020). Please include this scope request correspondence as an appendix in the IEA for reference.

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

Kind Regards

**Phillip Rose**

**A/Senior Compliance Officer**

Planning & Assessment | Department of Planning and Environment

T 02 6670 8657 | E [Phillip.Rose@planning.nsw.gov.au](mailto:Phillip.Rose@planning.nsw.gov.au)

PO Box 72 | MURWILLUMBAH NSW 2484

[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



*The Department of Planning and Environment acknowledges that it stands on Aboriginal land.*

*We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

*If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).*

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**From:** Steve Fermio <[sfermio@wolfpeak.com.au](mailto:sfermio@wolfpeak.com.au)>  
**Sent:** Friday, 21 July 2023 1:38 PM  
**To:** DPE PSVC Compliance Mailbox <[compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)>  
**Subject:** SSD - 8744305 - Kingscliff High School IA4 audit scope consultation

Dear Compliance Team,

I am one of the Department's approved Independent Auditors on the Kingscliff High School Project (SSD - 8744305).

We are currently preparing to undertake the fourth independent audit for the Project. The audit is required to be conducted in accordance with SSD-8744305 condition C37, and the Department's 2020 Independent Audits Post Approval Requirements (or IAPAR).

The on-site component of the audit is planned to take place on the 7 August 2023.

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

If you could provide a response by close of business on Friday 28 July that would be appreciated.

Kind regards

Steve Fermio | Principal Environmental & Earth Scientist  
Managing Director



Proud sponsor of

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M: 0417 170 645

P: 1800 979 716

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## APPENDIX D – SITE INSPECTION PHOTOGRAPHS








No.	Comment	Photograph
1	Site notice was installed at the site entrance.	
2	Concrete wash bin was available on site for use.	

No.	Comment	Photograph
3	Coir logs were installed on the site perimeter and around internal storm water pit.	
4	Coir log was installed around internal storm water drain	


No.	Comment	Photograph
5	Silt fence was installed around the site perimeter.	
6	Lockable and internally banded chemical / flammable storage cabinet in place.	

No.	Comment	Photograph
7	Metal skip bin was in place on site for construction waste.	
8	Spill kit in place, fully stocked ready for use.	

No.	Comment	Photograph
9	General waste skip bin available on site.	
10	Tree protection fence in place.	

No.	Comment	Photograph
11	Tree protection fence has been erected around the mature specimen tree	
12	Hoarding installed around the site perimeter.	

No.	Comment	Photograph
13	Traffic sign in place on approach to site entrance	
14	<p>Traffic controller on site.</p> <p>No mud tracked onto public road.</p>	

No.	Comment	Photograph
15	Memorial stone on site requires improved protection from potential construction impacts until a decision is made regarding the future of these stones.	 A photograph showing two large, rectangular, reddish-brown memorial stones resting on wooden pallets on a grassy area. To the right, there is a stack of long, silver metal beams. In the background, there are tall green grasses and a chain-link fence.





## APPENDIX E – DECLARATION FORMS



## Declaration of Independence - Auditor

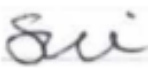
Project Name:	Kingscliff High School Redevelopment
Consent Number:	SSD 8744305
Description of Project:	The upgrades to Kingscliff High School will involve the construction of art and amenities buildings, the installation of a COLA (Covered Outdoor Learning Area), alterations to existing structures, and associated works, including demolition, tree removal, and upgrades to car parking and infrastructure.
Project Address:	33 Oxford Street, Kingscliff 2487
Proponent:	NSW Department of Education
Title of Audit	Independent Audit No. 4
Date:	24 August 2023

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 Proposed Auditor:	Steve Fermio
Signature:	
Qualification:	Bachelor of Science, ANU Honours in Geology, Monash University Graduate Diploma Land Rehabilitation, Federation University Certificate IV in Soil Health, Plant Nutrition & Pasture Development, New England Institute of TAFE Exemplar Global Lead Environmental Auditor Number 110498
Company:	WolfPeak Pty Ltd