

DOC22/217013

Michael Cassel
Planning Secretary
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2150

Attn: Rob Sherry,

16 March 2023

Dear Mr Cassel

Kingscliff Public School (SSD 8378620): Response to Independent Environmental Audit Report in accordance with Condition C39 and C40

I refer to SSD Application 8378620, Kingscliff Public School Redevelopment, approved on 15 February 2022.

In accordance, with condition C40 of the Development Consent, the following document has been submitted to the Planning Secretary for information:

- Independent Audit Report No. 2 dated 6/03/2023.

As per the requirements of condition C39b and C40 the Department must be issued with a response from the proponent to the Independent Audit Report, therefore the following attachments are provided for your information:

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

In accordance with consent condition C39c, the independent audit report and response to audit will be made publicly available on SINSW's website within 60 days of this letter.

Yours Sincerely,



Martyn Charlett
A/Senior Project Director – Schools Infrastructure NSW

Attachment A – Response to Independent Audit non-compliances

Condition ID	Auditor #	Compliance Requirement	Audit finding	Audit Recommendation	Recommended or completed actions	Proponents' response	Due Date/Status
C4	IA2_01	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: a) between 7am and 6pm, Mondays to Fridays inclusive; and b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays	Concrete pouring outside of the approved hours occurred on 15/09/22 and 07/12/22. These were notified to the Department on 21/09/22 and 14/12/22 respectively in accordance with A27.	These non-compliances were self-reported to DPE by the Project Team within the required 7 day period. Construction method amended to accelerate completion of works including adding accelerant compounds to concrete mix to allow finishing to occur quicker. Complaints Register indicates no complaints were received regarding work carried out outside the approved hours. No out of hours work conducted after the 2nd non-compliance was reported in December 2022.	None	This non-compliance was previously self-reported to DPE on (SSD-8378620-PA-17 and SSD-8378620-PA-20).	CLOSED
C5	IA2_02	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:	As above.	As above.	None	As above.	CLOSED

Condition ID	Auditor #	Compliance Requirement	Audit finding	Audit Recommendation	Recommended or completed actions	Proponents' response	Due Date/Status
		a) between 6pm and 7pm, Mondays to Fridays inclusive; and b) between 1pm and 4pm, Saturday					



Attachment B – Response to Independent Audit observations

Condition ID	Auditor #	Compliance Requirement	Audit Observation/Opportunity for Improvement	Recommended or completed actions	Proponents' response	Status
B17	IA2_03	<p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <p>(a) be prepared by a suitably qualified and experienced noise expert;</p> <p>(b) address the recommendations of the Noise and Vibration Impact Assessment dated 6 May 2021 and prepared by Acoustic Works;</p> <p>(c) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009)</p>	<p>Considering the non-compliances against C4 and C5 that occurred during the audit period it is recommended that the Construction Noise and Vibration Management Plan be reviewed to ensure that it encapsulates the additional mitigation measures identified in SINSW's letter to DPE of 21 September 2022 notifying them of the non-compliances (related to late finishing concrete works) that occurred on 15 September 2022. These additional measures included:</p> <ul style="list-style-type: none"> • Notifying any affected residents as soon as it is identified that works are expected to continue beyond the approved hours and in 	<p>Revise the CNVMSP to include the additional mitigation measures proposed in their non-compliance notification to DPE on 15/9/22.</p>	<p>An updated CNVMSP will be submitted under separate cover to DPE within three months of submitting this audit report.</p>	OPEN

Condition ID	Auditor #	Compliance Requirement	Audit Observation/Opportunity for Improvement	Recommended or completed actions	Proponents' response	Status
		<p>(d) describe the measure to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;</p> <p>(e) include strategies that have been developed with the community for managing high noise generating works;</p> <p>(f) describe the community consultation undertaken to develop the strategies in condition B17(e);</p> <p>(g) include a complains management system that would be implemented for the duration of the construction; and</p>	<p>accordance with Condition C7.</p> <ul style="list-style-type: none"> • Amended construction methodology to accelerate completion of the works including adding accelerant compounds to concrete mix to allow finishing to occur quicker • Trowelling machines used periodically to ensure suitable finish is achieved with a broom finish • During down periods while waiting for the concrete to finish, labour is returned to the crib rooms. • Task lighting installed and positioned to face away from affected resident 			

Condition ID	Auditor #	Compliance Requirement	Audit Observation/Opportunity for Improvement	Recommended or completed actions	Proponents' response	Status
		(h) include a program to monitor and report to the impacts and environmental performance of the development and the effectiveness of the implemented management measures in accordance with the requirements of condition B14				

