

DOC21/897327

Jim Betts
Planning Secretary
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Attn: Rob Sherry

12th Oct 2021

Dear Mr.Betts

Samuel Gilbert Public School (SSD 9274): Submission of Independent Audit Report and response in accordance with Condition C37 and C38

I refer to Samuel Gilbert Public School approved on the 15th February 2020.

In accordance, with condition C37 and C38 of the Development Consent, the following document has been submitted to the Planning Secretary for information:

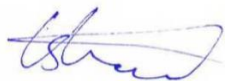
- Attachment A - Independent Environmental Audit, Samuel Gilbert Public School Redevelopment, SNC-Lavalin Atkins, August 2021, Rev 1

As per the requirements of condition C38 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 B - Response to Independent Audit findings

Please accept this as notice, in accordance with Condition C38c, that the Independent Audit Report will be made publicly available within 60 days from the date of this submission.

Yours sincerely



Tim Shand
Project Director
Schools Infrastructure NSW

Attachment A - Independent Environmental Audit, Samuel Gilbert Public School Redevelopment, SNC-Lavalin Atkins, August 2021, Rev 1

Attachment B – Response to Independent Audit Findings

Attachment B – Response to Independent Audit findings

Condition ID	Compliance Requirement	Audit Findings	Audit Recommendations	Department of Education/Contractors Actions	Evidence of actions
Non - Compliances					
A25	SGPS 03 NCR 01 The Planning Secretary must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Planning Secretary in writing to compliance@planning.nsw.gov.au within seven days after they identify any non-compliance.	Following the previous audit conducted 8 Dec 2020, 3 noncompliance's were identified. However, SINSW failed to submit the notifications associated with these in accordance with Conditions A25 and A26 and as such, this has triggered a further noncompliance with item A25 of the Conditions of Consent.	This has already been reported as a non-compliance in the May 2021 compliance Report. However, this is a technical self-reported non-compliance in this auditing period.	Due to staff change over there had been a delay in issuing the non-compliance notification to DPIE within the required time frame and as such this has triggered the non-compliance.	Notice of non-compliance letter issued to DPIE on 15/03/21 with no further action required.
Recommendations					
A21	SGPS 03 REC 01 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: a) make the following information and documents (as they are obtained or approved) publicly available on its website: [list of documents included in CoA] b) keep such information up to date, to the satisfaction of the Planning Secretary.	NA	The latest revision of the CEMP and subplans (Rev 9) was not on either website (SINSW or Planning portal). Update website with latest revision.	CEMP Rev 9 hasn't been approved by DPIE and is still in for determination. The version that is on the website is latest approved by DPIE. Updated version to be uploaded following approval.	
A28	SGPS 03 REC 02Within three months of:a) the submission of a compliance report under condition B34;b) the submission of an incident report under condition A23;c) the submission of an Independent Audit under condition C34;d) the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programsrequired under this consent must bereviewed, and the Planning Secretary andthe Certifying Authority must be notified in writing that a review is being carried out.	NA	Ensure reviews undertaken in required timeframes.If a formal revision is not required, based on a review of findings in the triggering documents within this condition (A28 a-d), document that a review was conducted but a revision was not required. Ensure DPIE and PCA are notified of this process and the outcome and maintain adequate records for auditing purposes.	Ongoing reviews undertaken with the contractor. No revision required for any documents issued to DPIE. DPIE and Certifier to notified of reviews as required.	

B29	SGPS 03 REC 03 Prior to the commencement of construction, the Applicant must submit design plans to the satisfaction of the relevant roads authority which demonstrate that the proposed construction accesses to the development are designed to accommodate the turning path of a heavy ridged vehicles.	NA	As assessed as compliant during the initial audit, design plans have been submitted to the satisfaction of the relevant roads authority (Hills Shire Council). The CPTMP has been revised in the audit period and includes changes to the Turning Path Assessment and updated Swept Analysis (App C) and further consultation with Council and TfNSW as relevant road authorities in Appendix F. Some concerns raised regarding proposed actions. Recommendation - until MOD1 is approved, no reversing onto or off site is approved and alternative arrangements should be made (crane/ street work zone).	Recommendation noted, this has been notified to Hutchinson Builders and confirmed that they have undertaken steps to stop vehicles from reversing onto or from site.	Contractor email provided as evidence.
B30	SGPS 03 REC 04 Compliance with the following requirements must be submitted to the satisfaction of the Certifying Authority: a) all vehicles must enter and leave the Site in a forward direction; b) that the operational car parking layout provides a minimum of 38 on-site car parking spaces for use during operation of the development and new car parking spaces must be designed in accordance with the latest versions of AS 2890.1 and AS 2890.6; c) that the construction access and car parking arrangements provide the swept path of the longest construction vehicle entering and exiting the Site; and d) the safety of vehicles and pedestrians accessing adjoining properties, where shared vehicle and pedestrian access occurs, is to be addressed.	NA	During the previous audit, a noncompliance was raised, as trucks were observed reversing onto site under traffic control, which was not approved to the satisfaction of the PCA. The project has attempted to resolve this matter by updating the CTPMSP and associated Swept Paths/ TCPs to include reversing onto site and have submitted a modification application (MOD1) to DPIE to modify the wording of this condition. This modification is still under consideration by DPIE and has not been approved. No reversing was observed on site during the audit, but the updated CTPMSP and compliance report suggests that reversing may have been occurring during the audit period, under traffic control. Recommendation - until MOD1 is approved, no reversing on site is approved, and alternative arrangements should be made (crane/ street work zone).	Recommendation noted, this has been notified to Hutchinson Builders and confirmed that they have undertaken steps to stop vehicles from reversing onto or from site.	Contractor email provided as evidence.
B34	SGPS 03 REC 05 The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary and notify the Planning Secretary and the Certifying Authority in writing at least seven days before this is done.	NA	As noted in the compliance monitoring and reporting program (as detailed in B33), a pre-operation compliance report will be required prior to the occupation of Buildings N and P. Ensure timeframes are met to avoid a non-compliance.	Pre-operation Compliance report is underway. It will be issued to DPIE prior to commencement of occupation of Building N & P (Stage 1).	Evidence will be provided once issued to DPIE.
C19	SGPS 03 REC 06 The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	NA	DGB driveway along Gilbert Road entrance observed to be quite full of fine sediment and dirt and recommend replacing or installing more DGB to assist with the removal of dirt from vehicle tyres. Cattle grid in place and working well at driveway entry/ exit.	Cattle grid driveway has been adjusted to accommodate the Block Q works, a temporary concrete hardstand has been installed and the cattle grid is clear of any debris. Driveway will be maintained as required. Photo attached.	Proof of evidence provided – see contractor email and photo.

C21	SGPS 03 REC 07 All erosion and sediment control measures must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment. Erosion and sediment control techniques, as a minimum, are to be in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom, 2004) commonly referred to as the 'Blue Book'.	NA	New stormwater connection may need filter on outlet, considering extent of exposed soil surrounding area. (HB team noted, outlet is at a high level, and hasn't discharged from site). However, area may be stabilised shortly as seems prepared for landscaping (smoothed soil around garden beds).	The Stormwater Operation Management Plan submitted as part of the SSD Part D requirements addresses the requirement for filters in Stage 2. Contractor will follow as per consultant's advice.	Proof of evidence provided – see contractor email and photo.
C21	SGPS 03 REC 08	NA	Due to slope of site and nature of works, considerable soil is exposed, which presents an erosion risk. This is most notable immediately north or upslope from Building N. Discuss soil stabilisation measures with erosion specialist. May include covering exposed soil with geofabric if heavy rain forecast or installing upslope berms to direct water and runoff away from unconsolidated soil slopes.	Numerous concrete hardstands have now been poured to the area north of Block N covering the sloped soil area, as well as a new stormwater pit to service the landscape area in question. As such, the sloped soil area has been significantly reduced in size. Photos attached. Should a significant weather event be forecast then additional controls can be implemented beforehand.	Proof of evidence provided – see contractor email and photo.
D1	SGPS 03 REC 09 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.	NA	Ensure commencement of operation notification sent to DPIE at least 1 month prior to the commencement of stage 1 (Buildings N/P).	Commencement of operation Stage 1 notification issued to DPIE on 21/09/21	Proof of evidence provided - see email ref. SSD-9274-PA-53.