



NSW Department of Education

Waitara Public School

(SSD 8574)

SINSW Response to Independent
Environmental Audit (IEA)

4 February 2020 (Revision 01)

Response to Independent Environmental Audit Non-Compliances

Three non-compliances have been identified in the IEA report dated 13 September 2019 (Revision 01). The non-compliances are being addressed as follows;

ID	Consent Heading	Compliance Requirement	Comments / Observations / Supporting Documentations	Compliance Status	Independent Audit Findings and Recommendations Actions (A) = address non-compliances Recommendations (R) = address observations	SINSW Response and Actions																																																																																
A2	Terms of Consent	<p>The development may only be carried out:</p> <p>(a) in compliance with the conditions of this consent;</p> <p>(b) in accordance with all written directions of the Planning Secretary;</p> <p>(c) generally in accordance with the EIS and Response to Submissions;</p> <p>(d) in accordance with the approved plans in the table below:</p> <table><tr><th colspan="4">Architectural Drawings prepared by NBRIS Architecture</th></tr><tr><th>Dwg No.</th><th>Rev</th><th>Name of Plan</th><th>Date</th></tr><tr><td>18159-A-WD-00-02</td><td>P4</td><td>Site Demolition Plan</td><td>4/10/2018</td></tr><tr><td>18159-A-WD-00-01</td><td>A</td><td>Site Plan</td><td>31/01/2019</td></tr><tr><td>18159-A-WD-10-01</td><td>A</td><td>General Arrangement – Level 1</td><td>31/01/2019</td></tr><tr><td>18159-A-WD-10-02</td><td>A</td><td>General Arrangement – Level 2</td><td>31/01/2019</td></tr><tr><td>18159-A-WD-10-03</td><td>A</td><td>General Arrangement – Level 3</td><td>31/01/2019</td></tr><tr><td>18159-A-WD-10-04</td><td>A</td><td>General Arrangement – Level 4</td><td>31/01/2019</td></tr><tr><td>18159-A-WD-10-05</td><td>A</td><td>General Arrangement – Roof Plan</td><td>31/01/2019</td></tr><tr><td>18159-A-WD-30-01</td><td>A</td><td>Elevations</td><td>31/01/2019</td></tr><tr><td>18159-A-WD-30-02</td><td>A</td><td>Elevations</td><td>31/01/2019</td></tr><tr><td>18159-A-WD-30-11</td><td>A</td><td>Sections</td><td>31/01/2019</td></tr><tr><td>18159-A-WD-30-12</td><td>A</td><td>Sections</td><td>31/01/2019</td></tr><tr><th colspan="4">Landscape Plans prepared by GHD Woodhead</th></tr><tr><th>Dwg No.</th><th>Rev</th><th>Name of Plan</th><th>Date</th></tr><tr><td>21-26108-WA-SD-LA-1000</td><td>E</td><td>Landscape Site Plan</td><td>03/08/2018</td></tr><tr><td>21-26108-WA-SD-LA-1107</td><td>D</td><td>Landscape General Arrangement (Sheet 7 of 8)</td><td>03/08/2018</td></tr><tr><td>21-26108-WA-SD-LA-3107</td><td>C</td><td>Landscape Planting Plan (Sheet 7 of 8)</td><td>03/08/2018</td></tr><tr><td>21-26108-WA-SD-LA-2107</td><td>C</td><td>Landscape Levels and Setout Plan</td><td>03/08/2018</td></tr><tr><td>21-26108-WA-SD-LA-1003</td><td>E</td><td>Landscape Available Play Space Area</td><td>03/08/2018</td></tr></table>	Architectural Drawings prepared by NBRIS Architecture				Dwg No.	Rev	Name of Plan	Date	18159-A-WD-00-02	P4	Site Demolition Plan	4/10/2018	18159-A-WD-00-01	A	Site Plan	31/01/2019	18159-A-WD-10-01	A	General Arrangement – Level 1	31/01/2019	18159-A-WD-10-02	A	General Arrangement – Level 2	31/01/2019	18159-A-WD-10-03	A	General Arrangement – Level 3	31/01/2019	18159-A-WD-10-04	A	General Arrangement – Level 4	31/01/2019	18159-A-WD-10-05	A	General Arrangement – Roof Plan	31/01/2019	18159-A-WD-30-01	A	Elevations	31/01/2019	18159-A-WD-30-02	A	Elevations	31/01/2019	18159-A-WD-30-11	A	Sections	31/01/2019	18159-A-WD-30-12	A	Sections	31/01/2019	Landscape Plans prepared by GHD Woodhead				Dwg No.	Rev	Name of Plan	Date	21-26108-WA-SD-LA-1000	E	Landscape Site Plan	03/08/2018	21-26108-WA-SD-LA-1107	D	Landscape General Arrangement (Sheet 7 of 8)	03/08/2018	21-26108-WA-SD-LA-3107	C	Landscape Planting Plan (Sheet 7 of 8)	03/08/2018	21-26108-WA-SD-LA-2107	C	Landscape Levels and Setout Plan	03/08/2018	21-26108-WA-SD-LA-1003	E	Landscape Available Play Space Area	03/08/2018	Refer non-compliant conditions below.	Non-Compliant	(A): Address non-compliant conditions as indicated below.	Non-compliance noted. This condition is non-compliant due to non-compliances with other conditions identified. Refer responses and actions below. All conditions compliant except B6, which will remain non-compliant due to nature of condition
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A21	Access to Information	<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>(ii) all current statutory approvals for the development;</p> <p>(iii) all approved strategies, plans and programs required under the conditions of this consent;</p> <p>(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;</p> <p>(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any</p>	<p>Letter issued by SINSW to DoPE (DOC19/ 319915) via email on 3 May 2019. Information is published on the SINSW project website for Waitara Public School Upgrade Project: https://www.schoolinfrastructure.nsw.gov.au/projects/w/waitarapublic-school.html</p> <p>The following information is currently not available on the website:</p> <ul style="list-style-type: none">all approved strategies, plans and programs required under the conditions of this consentreporting on environmental performancesummary of the monitoring resultsa complaints register <p>Project website is not up to date. Next steps lists 'commence construction of the new school' and refers to an information booth to be held in Term 2 2019.</p> <p>Contact details to make enquiries or complaint only provided as</p>	Non-Compliant	(A): Project website to be updated with all available information and documents referred to in Condition A21.	Non-compliance noted. Missing documentation and information has been uploaded on the SINSW school project website to resolve this non-compliance. 1. The following documentation is included on DoE project website: <ul style="list-style-type: none">SSDA applicationComplaints registerCommunity communication strategyIndependent environmental auditPre-construction compliance reportDevelopment consentSite demolition planSite plan																																																																																

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		conditions of this consent, or any approved plans and programs; (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint; (viii) a complaints register, updated monthly; (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; (x) any other matter required by the Planning Secretary; and (b) Keep such information up to date, to the satisfaction of the Planning Secretary.	general email addresses. 1800 number should be included.			<ul style="list-style-type: none"> • General arrangements • Elevations • Sections • Landscape plans 2. The current version of the following documents are in notification process to DPIE and are expected to be loaded on the website in Feb 19: <ul style="list-style-type: none"> • CEMP Version 4, dated 9 Jan 20 • CCR Version, dated 19 Nov 19 3. The Project website is up to date regarding program and contact details 4. Website contact details meet DoE community engagement requirements 5. Regular environmental performance reporting is in place CURRENT STATUS: COMPLIANT
B6	External Walls and Cladding	The Applicant must provide a copy of the documentation given to the Certifying Authority to the Planning Secretary within seven days after the Certifying Authority accepts it.	Email of Condition B5 documentation accepted by the certifier confirmed by email dated 16.04.19 Letter issued by SINSW to DoPE (DOC19/320897) via email on 02.05.19 Documentation was not submitted to DoPE within the required timeframe (seven days after the Certifying Authority accepted it).	Non-Compliant	None	This condition is non-compliant due to the timing requirements not being met. The requirements of this condition have been satisfied.

Response to Independent Environmental Audit Corrective Action Requests/Observations

Three corrective action requests/observations were included in the IEA report dated 13 September 2019 (Revision 01). SINSW has reviewed the recommendations and provides the following commentary:

ID	Consent Heading	Compliance Requirement	Comments / Observations / Supporting Documentations	Compliance Status	Independent Audit Findings and Recommendations Actions (A) = address non-compliances Recommendations (R) = address observations	Actions Taken / to be Taken following SINSW Response to IEA
B10	Unexpected Contamination Procedure	Prior to the commencement of earthworks, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition 820 and must ensure any material identified as contaminated must be disposed off-site, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the site.	<ul style="list-style-type: none"> Project Management Plan, Environmental Management Plan and Environmental Risk Register, Waitara Public School, Edgeworth David Road, Waitara NSW, version 2-190304, ADCO Pty Ltd, 4 March 2019. <p>Unexpected finds protocol for contamination included as Annexure 6 to the Environmental Management Plan.</p> <ul style="list-style-type: none"> Updated unexpected finds protocol provided to the auditor by SINSW via email on 3 July 2019 	Compliant	R): The updated unexpected finds protocol should be incorporated into the Environmental Management Plan.	Unexpected finds protocol (contamination) (page 49 of the CEMP) has been revised. Version 4 of the CEMP is currently in notification process to DPIE. CURRENT STATUS: CORRECTIVE ACTION IMPLEMENTED
C32	Waste Storage and Processing	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	All trucks have a sliding tarp to cover the load.	Compliant	(R) – All tipping dockets should be retained consistent with the waste tracking register for the duration of the works.	All tipping dockets are retained and included in waste tracking register CURRENT STATUS: CORRECTIVE ACTION IMPLEMENTED
C36	Community Engagement	The Applicant must consult with the community regularly throughout construction, including consultation with the nearby sensitive receivers, relevant regulatory authorities, Registered. Aboriginal Parties and other interested stakeholders.	<ul style="list-style-type: none"> Community Communication Strategy, Waitara Public School, School Infrastructure NSW, May 2019. <p>Consultation is undertaken regularly with the school community.</p>	Compliant	R): Community updates to be published on the SINSW project website for Waitara Public School Upgrade Project.	Project website is up to date with latest community update CURRENT STATUS: CORRECTIVE ACTION IMPLEMENTED
A15	Demolition	Demolition work must comply with Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 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 Certifying Authority before the commencement of works.		Not Triggered	Demolition works relating to Stage 2 of the development be undertaken in accordance with conditions A15 and C4	Not triggered - Stage 2 works have not commenced, however, this recommendation has been noted and this condition will be satisfied during Stage 2.
C4	Demolition	Demolition work must comply with Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001). The work plans required by AS 2601-2001 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 Certifying Authority before the commencement of works.		Not Triggered	Demolition works relating to Stage 2 of the development be undertaken in accordance with conditions A15 and C4	Not triggered - Stage 2 works have not commenced, however, this recommendation has been noted and this condition will be satisfied during Stage 2.
B3	Notification of Commencement	If the construction or operation of the development is to be staged, the Department 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.		Not Triggered	DoPE be notified prior to commencement of Stage 2 in accordance with condition B	Not triggered - Stage 2 works have not commenced, however, this recommendation has been noted and this condition will be satisfied during Stage 2.