

DOC20/369785

Jim Betts
Planning Secretary
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Attn: Jim Betts

28 April 2020

Dear Mr Betts

Jordan Springs Public School (SSD 9354): Submission of Independent Audit Report and response in accordance with Condition C36 and C37

I refer to Jordan Springs Public School approved on the 5th September 2019.

In accordance, with condition C36 of the Development Consent, the following document has been submitted to the Planning Secretary for information:

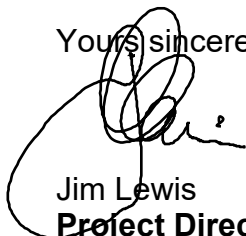
- SSD 9354 - March 2020 - Independent Environmental Construction Audit Report #2

As per the requirements of condition C37 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 recommendations

Additionally, in accordance, with condition C37 of the Development Consent and with at least 7 days' notice, please be advised that the Department intend to make the Construction Compliance Report publicly available on it's website, no sooner than 60 days following the submission of this letter.

Yours sincerely



Jim Lewis
Project Director
Schools Infrastructure NSW

Attachment A – Response to Independent Audit non-compliances

CoC	Consent heading	Compliance Requirement	Auditor's Comments / Observations	Compliance Status	SINSW Response and Actions
A22	Access to Information	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: (iii) all approved strategies, plans and programs required under the conditions of this consent; (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;	Requires certain information and documents (as they are obtained or approved) to be publicly available on the Project website. (iii) The most recent versions of the CEMP (Rev 5 dated 7 November 2019) is not on the Schools Infrastructure Project website. The website displays Rev 3 dated 16/09/19. (ix) requires audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report. The Independent Audit completed by Aspect Environmental dated 12/11/19 and the Applicant's response to the recommendations in Aspects audit are not available	Non-compliant	Non-compliance noted. Revision 5 CEMP & Audit Reports Audit Response have been uploaded to SINSW website on 27/4/20. No further action required

CoC	Consent heading	Compliance Requirement	Auditor's Comments / Observations	Compliance Status	SINSW Response and Actions
			on the Schools Infrastructure Project Website.		
B9	Ecologically sustainable development	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by either: (b) seeking approval from the Planning Secretary for an alternative certification process.	Requires registration for a minimum 4-star Green Star rating with the Green Building Council Australia or approval from the Planning Secretary for an alternative certification process. DoE requested a 6 month extension on 16/09/19 to assess an alternate ESD certification pathway. DPIE provided a 3 – month extension. No evidence was provided to verify ESD objectives are being achieved by either minimum 4-star Green Star with the Green Building Council Australia, or an alternative certification process.	Non-compliant	Non-compliance noted. DPIE approved extension request for approval of Alternative ESD certification process. Letter sent 30 March 2020. No further action required – supplementary letter issued 29 April 2020
B22	Roads and Pedestrian Infrastructure	Within 3 months of commencement of construction, detailed plans must be prepared in consultation with and approved by Council for the provision of the following:	Condition requires detailed plans to be prepared in consultation with and approved by Council within 3 months of commencement of construction. While	Non-compliant	Non-compliance noted. Council approval was not obtained within 3 months of

CoC	Consent heading	Compliance Requirement	Auditor's Comments / Observations	Compliance Status	SINSW Response and Actions
		(a) pick-up/drop-off zone in Cullen Avenue; (b) raised pedestrian 'Children's Crossing' platform in Cullen Avenue; (a) a raised pedestrian crossing, with associated street lighting complying with AS 1158 and Council Street Lighting Policy; (b) pavement marking and signage for "No Stopping" zones; (c) school "Bus Zone" signage with boarding points and bus shelters for two buses complying with Disability Discrimination Act and Council requirements; (d) "Kiss and Ride" drop-off/pick-up zone signage; (e) short term parking signage; and (f) any other traffic and parking restrictions in the public roads or car parks.	consultation has been evidenced, Council approval has only been provided for signage and line-marking. No evidence has been sighted that the remaining public domain works have been approved.		commencement. However, has since been obtained on 10/3/20
C29	Site Contamination	Prior to the commencement of construction, 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	Requires that where any material identified as contaminated is to be disposed off-site, the disposal location and results testing for the unexpected asbestos find in soil were submitted to the	Non-compliant	Non-compliance noted. DPIE notification was not sent prior to removal. Test results and waste dockets

CoC	Consent heading	Compliance Requirement	Auditor's Comments / Observations	Compliance Status	SINSW Response and Actions
		with Condition B13 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.	Planning Secretary prior to its removal from the site. No evidence to verify that notification occurred was provided.		submitted to DPIE on 23/4/20
C39	Landscaping	Within 3 months of the commencement of construction, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping works on-site, to the satisfaction of the Certifying Authority. The plan must: (a) provide for the planting of 55 trees indigenous to the local area including 25 trees of intermediate mature size up to 12m and 30 larger native trees with a minimum mature size of 15m and a potential mature size of 25m;	Requires the Landscape Management Plan to be endorsed by the Certifying Authority within 3 months (12 weeks) of commencement of construction. The Certifying Authority (Group DLA) did not confirm their endorsement of the Landscape Management Plan until approximately 22 weeks after construction commenced. No evidence of consultation with Council under C39(c) has been sighted.	Non-compliant	Non-compliance noted. All items have been approved by Sec 138 approval, dated 10/3/20. Consultation required under C39c) was undertaken with Jake Hausfield, dated 22/2/20

Attachment B – Response to Independent Audit recommendations

Audit Improvement Opportunities	Audit Improvement Recommendations	Department of Education Actions	Evidence of actions
Chemical Storage	Correct and adequate labelling of storage containers	All chemicals situated on site to be correctly labelled and stored to suit MSDS	Noted, chemicals are stored within the chemical storage container/cage as required. Hard copies of the MSDS's are kept within the first aid room. During weekly environmental inspections if any chemicals are found not stored or labelled incorrectly RCC will rectify as required
Emergency response signage and location	There was a sign indicating the location of a spill kit while the spill kit was present, approximately 30 m away, it was not in the location that site staff would be expected to be able to locate it in the event of an emergency. Absence of the spill kit in its designated location would indicate it was being used for a spill on site, however, this was not observed to be the case	Spill kit to be placed in sufficient location, as indicated and designated for safe usage.	Due to the absence of the spill kit from its designated location on site it would indicate it was used for a spill on site. The spill kit has since been replenished and located back to its designated area.
Erosion and sediment control	Some sections of sediment fence required attention (not keyed into the ground correctly or requiring reinstatement post-storm event). It was noted onsite that this was a work in progress in response to recent storm event.	Sediment fencing to be reinstated.	Sediment fencing was in the process of being re-instated in response to the recent storm event on site. In addition, weekly environmental inspections are conducted to ensure sediment

Audit Improvement Opportunities	Audit Improvement Recommendations	Department of Education Actions	Evidence of actions
			and erosion control measures are in place and working effectively.
Management plan requirements for process reviews, records and documentation	Note	Management plans to be reviewed regularly and all records and documentation to be kept current. Management plan to be updated in accordance with consent condition following this audit.	Management plans are reviewed on a regular basis to ensure relevance to the current site conditions. If conditions change then an inspection report and recommendations by the appropriate consultant are provided
Weed management	Assess the need for weed control, particularly on stockpiles and adjacent to fences. Any commercial application of herbicide should be undertaken with an awareness of training/certification, record keeping and notification requirements that may be applicable under the Pesticides Act 199	Weed control assessment to be undertaken, special focus to areas of stockpiles and adjacent to fences.	Vegetation is used to stabilise stockpiles. This stockpile is now in the process of being carted off-site.