

ATTACHMENT A – Response to Independent Audit non-compliance

Item	Cond. No.	Condition Breached	Reason for non-compliance	Proponent's Proposal or Completed Action or reason for not implementing measures/changes
1	E16	<p>The Construction Waste Management Sub-Plan (CWMS) must address, but not be limited to, the procedures for the management of waste comprising:</p> <p>(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;</p> <p>(b) information regarding the recycling and disposal locations; and</p> <p>(c) confirmation of the contamination status of the development areas of the site based on the validation results.</p>	<p>The CWMS did not adequately address all waste streams generated by the development, including bulk spoil and demolition wastes managed by the earthwork's contractor and other parties, and therefore did not fully demonstrate compliance with the requirements of condition E16.</p>	<p>The CWMS and Construction and Environmental Management Plans will be updated and/or revised in accordance with condition C17 to ensure full compliance with condition E16, addressing all waste streams generated by the project, including bulk spoil and demolition wastes.</p> <p>This update will be undertaken as part of the Construction Certificate documentation for Stage 1 Substage 2 (refer Staging Report submitted under condition C14). An updated report will be issued to DPHI on or before 10 July 2026.</p>

Attachment B – Response to Independent Audit observations/recommendations

Report	Compliance Requirement	Audit Observation/Opportunity for Improvement	Proponent's Proposal or Completed Action or reason for not implementing measures/changes
Condition E11	<p>Environmental Management Plan Requirements:</p> <p>Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020).</p>	<p>To improve traceability and clarity for future reviews, amend the CEMP to correctly reference the project-specific HSEMP, rather than the corporate EMS, as the document addressing the key elements of the Environmental Management Plan Guideline.</p> <p>The CEMP should also include a table (similar to the table included under Table A1, Condition E11 of this report) identifying where each element of the Guideline is addressed, including cross-references to the relevant CEMP sub-plans and applicable HSEMP sections.</p>	<p>The CEMP will be reviewed and updated, where appropriate, to incorporate the audit observations/improvement opportunities. This update will be undertaken as part of the Construction Certificate documentation for Stage 1 Substage 2 (refer Staging Report submitted under condition C14), which is scheduled to be completed within the next 2–6 weeks.</p>
Condition E11	<p>Environmental Management Plan Requirements:</p> <p>Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020).</p>	<p>The CEMP should identify hold points required by the Approval and other statutory instruments including where Certifier, Council or other agency approvals are required before construction or other activities can commence.</p>	<p>The CEMP will be reviewed and updated, where appropriate, to incorporate the audit observations/improvement opportunities. This update will be undertaken as part of the Construction Certificate documentation for Stage 1 Substage 2 (refer Staging Report submitted under condition C14), which is scheduled to be completed within the next 2–6 weeks.</p>
Condition E13	<p>The Applicant must not commence construction of the development until the CEMP is approved by the Certifier and a copy submitted to the Planning Secretary.</p>	<p>Amend the Construction Certificate and/or associated approval documentation to explicitly reference the approved CEMP revision and associated appendices relied upon to satisfy Conditions E12 and E13 of the consent.</p>	<p>Explicit approval of the CEMP will be sought from the Certifier prior to the issue of any future Construction Certificates.</p>

Report	Compliance Requirement	Audit Observation/Opportunity for Improvement	Proponent's Proposal or Completed Action or reason for not implementing measures/changes
Condition E15 (d) and (e)	The Construction Noise and Vibration Management Sub-Plan (CNVMSP) must address, but not be limited to, the following: (d) include strategies that have been developed with the community for managing high noise generating works; (e) describe the community consultation undertaken to develop the strategies in condition	Amend Section 6.4 of the NVMP to better document the consultation and mitigation processes currently implemented for high noise generating works in proximity to sensitive receivers. This should include the consultation undertaken with the school, ELC and other sensitive receivers to develop, implement and refine mitigation strategies, consistent with the requirements of Condition E15(d) and (e).	The CNVMSP will be reviewed and updated, where appropriate, to incorporate the audit observations/improvement opportunities. This update will be undertaken as part of the Construction Certificate documentation for Stage 1 Substage 2 (refer Staging Report submitted under condition C14), which is scheduled to be completed within the next 2–6 weeks.

Attachment C – Response to Independent Audit observations/recommendations – CEMP

Management Plan	Finding	Audit Observation/Opportunity for Improvement	Proponent's Proposal or Completed Action or reason for not implementing measures/changes
CSWMP	<p>Dust cloth screening had previously been installed along the sensitive boundary during asbestos removal works. The dust cloth was subsequently removed following completion of those activities. At the time of the inspection, ongoing activities adjacent to the boundary were limited and did not appear to generate significant dust impacts; however, reinstatement of the screening may be required should higher dust-generating activities recommence in proximity to the sensitive boundary.</p> <p>An aggregate stockpile was observed within the setback area adjacent to the Lot 23 boundary. The stockpile consisted of coarse aggregate material and did not present a significant risk of dust generation, sediment runoff, or off-site impact to Lot 23 at the time of the inspection.</p>	Review and, where appropriate, update the CSWMP requirements relating to dust cloth screening and stockpile setbacks adjacent to the Lot 23 boundary to reflect the reduced risk profile following completion of the asbestos removal works, subject to DPHI approval where required.	The CSWMP will be reviewed and updated, where appropriate, to incorporate the audit observations/improvement opportunities. This update will be undertaken as part of the Construction Certificate documentation for Stage 1 Substage 2 (refer Staging Report submitted under condition C14), which is scheduled to be completed within the next 2–6 weeks.
CNVMP	Community notifications were undertaken for potentially disruptive and out-of-hours activities, with evidence of night works notifications sighted during the audit. However, no evidence was available to verify that disruption notices had been issued to the nearby school/preschool or that letterbox drop notifications had been distributed to surrounding receivers where required.	Maintain records of all community notifications issued under the CNVMP, including notifications to nearby educational facilities and letterbox drop distributions to surrounding receivers, to demonstrate implementation of community communication requirements.	Records of all Disruption Notices and community notifications will be maintained throughout the project. It is noted that, during the audit, evidence of notifications relating to approved out-of-hours works, together with the associated Disruption Notices, was sighted. These notifications represent all disruption-related notifications issued on the project to date.
CTPMP	Traffic control measures observed during the inspection appeared generally consistent with the approved Traffic Guidance Scheme (TGS). Site personnel	Maintain formal records of daily inspections of traffic control devices and traffic management arrangements to demonstrate compliance with the inspection and monitoring requirements of the approved Traffic Guidance Scheme (TGS).	The CTPMP will be reviewed and updated, where appropriate, to incorporate the audit observations/improvement opportunities. This update will be undertaken as part of the Construction Certificate documentation for

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	advised that daily checks of traffic control devices and arrangements are undertaken; however, formal documented records of these inspections were not sighted during the audit.		Stage 1 Substage 2 (refer Staging Report submitted under condition C14), which is scheduled to be completed within the next 2–6 weeks.
CWTS	No designated on-site worker parking area had been established at the time of the inspection, consistent with the intent of the plan. Current workforce numbers were relatively low and no significant parking impacts were observed during the audit. However, as the project transitions into the main building construction phase and workforce numbers increase, there is potential for parking pressures to affect surrounding streets.	As workforce numbers increase during the main building construction phase, implement additional parking management measures and monitoring of surrounding streets to minimise potential parking impacts on neighbouring properties and the local road network.	The CWTS will be reviewed and updated, where appropriate, to incorporate the audit observations/improvement opportunities. This update will be undertaken as part of the Construction Certificate documentation for Stage 1 Substage 2 (refer Staging Report submitted under condition C14), which is scheduled to be completed within the next 2–6 weeks.
CWTS	Site personnel advised that workers are encouraged to utilise public transport where practicable. Public transport options and access arrangements are reportedly communicated through inductions and contractor information packs; however, supporting records were not available for review at the time of the audit.	Maintain documented evidence demonstrating that: <ul style="list-style-type: none"> • public transport options, parking restrictions and access arrangements are communicated to workers through inductions, contractor information packs and associated CWTS communications; • public transport information is displayed and communicated to workers in accordance with the CWTS; • carpooling initiatives and related transport management requirements are communicated to workers; and • toolbox talks address worker parking management and transport requirements are undertaken at the frequency specified within the CWTS. 	The CWTS will be reviewed and updated, where appropriate, to incorporate the audit observations/improvement opportunities. This update will be undertaken as part of the Construction Certificate documentation for Stage 1 Substage 2 (refer Staging Report submitted under condition C14), which is scheduled to be completed within the next 2–6 weeks. Content relating to the observation will be prepared and communicated to relevant workers, with appropriate records maintained to demonstrate implementation and compliance.
CWMP	Waste generated by the project was transported and processed by an appropriately licensed waste contractor. Aussie Skips was identified as the	Verify and maintain records demonstrating that receiving waste facilities are appropriately licensed under the relevant NSW EPA requirements to accept the waste streams generated by the project.	The CSWMP will be reviewed and updated, where appropriate, to incorporate the audit observations/improvement opportunities. This update will be undertaken as part of the Construction Certificate documentation for

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	<p>primary waste contractor servicing the site during the audit period. However, evidence was not available to verify that the receiving waste facilities were appropriately licensed to accept the specific waste streams generated by the project.</p>		<p>Stage 1 Substage 2 (refer Staging Report submitted under condition C14), which is scheduled to be completed within the next 2–6 weeks.</p> <p>Records will be maintained as noted in the audit findings.</p>
CWMP	<p>Recycling performance information, including percentage recovery and recycling outcomes, was sighted for waste managed by Aussie Skips. However, equivalent recycling performance records for waste generated by the earthmoving contractor were not available for review at the time of the audit.</p>	<p>Obtain and maintain recycling performance records from all waste contractors, including earthmoving contractors, to demonstrate recycling outcomes and implementation of the Waste Management Plan objectives.</p>	<p>The CSWMP will be reviewed and updated, where appropriate, to incorporate the audit observations/improvement opportunities. This update will be undertaken as part of the Construction Certificate documentation for Stage 1 Substage 2 (refer Staging Report submitted under condition C14), which is scheduled to be completed within the next 2–6 weeks.</p> <p>Records will be maintained as noted in the audit findings.</p>