

Attachment A – Response to Independent Audit non-compliances

Condition ID	Compliance Requirement	Audit finding	Audit Recommendation	Proponent's Proposed Action/Action Taken/Response	Evidence	Due Date/Status
B18	The Construction and Demolition Waste Management Sub-Plan (CDWMSP) must address, but not be limited to, the following: a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and b) removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of any building works.	Non-Compliance: The Construction and Demolition Waste Management Sub-Plan (CDWMSP) dated 3 April 2023 (Rev. 1.0), does not include the details of the licenced disposal facilities where the waste is currently being taken. Additionally, the Plan has not been updated to include the new waste Contractor information (Sydney Waste Services) who is responsible for removal of waste material from site	Proposed action: Update the CDWMSP to include all the licenced disposal facilities where the waste material has been taken to, and the details of Sydney Waste Services as the new waste contractor	Action Taken: Updated the CDWMSP to include all the licenced disposal facilities where the waste material has been taken to, and the details of Sydney Waste Services as the new waste contractor. Proposed action: Submission of revised CDWMSP will be undertaken as part of SSDA consent condition C38 Revision of Strategies, Plans and Programs – Within 3 months of the submission of an Independent Audit under condition B33 and B34.		Open



Attachment B – Response to Independent Audit observations

Condition ID	Compliance Requirement	Audit Observation/Opportunity for Improvement	Proponent's Proposed or Completed Action or reason for not implementing measures/changes	Evidence	Due Date/Status
B16	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council; (c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; (d) detail heavy vehicle routes, access and parking arrangements; (e) include a Driver Code of Conduct to: i) minimise the impacts of earthworks and construction on the local and regional road network; ii) minimise conflicts with other road users; iii) minimise road traffic noise; and iv) ensure truck drivers use specified routes (f) include a program to monitor the effectiveness of these measures; (g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.	<p>Observation: The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) prepared by Traffic Logistics indicates that the Plan will be reviewed every 6 months, however at the time of audit there had not been a formal review of the sub-plan within the committed timeframe. The last review was completed on 17 April 2023.</p> <p>Proposed action: Review the CTPMSP to meet the project review cycle commitment.</p> <p>Prior to the finalisation of this audit report, it was indicated by the Contractor (PBG) that the Project Management Plan (PMP) and associated appendices (including the CTPMSP) have been reviewed and changes have been recorded in the Plan, as necessary. Amendments Table indicated the PMP was reviewed on the 7 December 2023 and 23 of January 2024.</p>	<p>Completed action: CTPMSP was reviewed - Completed on the 25/01/24 - nil changes.</p> <p>The project team notes that the changes referred to by the auditor were amendments to the PMP. No changes required to the CTPMSP.</p>		Closed
B19	The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMSP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council; (b) be submitted to the approval of the Certifier prior to the commencement of construction; (c) describe all erosion and sediment controls to be implemented during construction; (d) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (e) detail all off-site flows from the site; and (f) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 5-year ARI and 1 in 100-year ARI.	<p>Observation: The Construction Soil and Water Management Sub-Plan (CSWMSP) dated 21 April 2023 (Rev. 2) requires further revision to include the location of all the stormwater pits and drains on site and the associated erosion and sediment controls implemented on site.</p> <p>Proposed action: Update the CSWMSP to include the location of all on-site stormwater pits and drains, and the erosion and sediment controls implemented on site. Prior to the finalisation of this audit report, it was indicated by the Contractor (PBG) that the CSWMSP has been updated and notification of the revised Plan will be provided to the Planning Secretary in accordance with condition C38: Revision of Strategies, Plans and Programs.</p>	<p>Completed action: CSWMSP updated to Revision 4 with updated project ERSED plan incorporating Stage 2 drainage pits.</p> <p>Proposed Action: Submission of revised CSWMSP will be undertaken as part of SSSA consent condition C38 Revision of Strategies, Plans and Programs – Within 3 months of the submission of an Independent Audit under condition B33 and B34.</p>		Open

Condition ID	Compliance Requirement	Audit Observation/Opportunity for Improvement	Proponent's Proposed or Completed Action or reason for not implementing measures/changes	Evidence	Due Date/Status
B24	The Applicant must notify the RMS Traffic Management Centre of the truck route(s) to be followed by trucks transporting waste material from the site, prior to the commencement of the removal of any waste material from the site.	<p>Observation: The Construction and Demolition Waste Management Sub-Plan (CDWMSP) dated 3 April 2023 (Rev. 1.0), includes in Appendix A, table 2, the proposed truck routes to waste facilities; however, the nominated waste contractor is no longer responsible for those waste activities on-site. The CDWMSP requires revision to include the new contractor details and all associated undertakings to remove waste material from the site. Furthermore, the RMS Traffic Management Centre needs to be notified of the current truck route(s) followed by the trucks transporting waste material for the site.</p> <p>Proposed action: Update the CDWMSP to include the details of the new waste contractor and truck routes for removal of on-site waste material. Notify the RMS Traffic Management Centre of the current truck route(s) followed by the trucks transporting waste material for the site.</p>	<p>Action Taken: CDWMSP Revision 2 updated with waste management contractor details, waste facilities and proposed truck routes (Appendix A) and Traffic Management Centre notification (Appendix B) updated</p> <p>Proposed action: Submission of a revised CDWMSP will be undertaken as part of SSSA consent condition C38 Revision of Strategies, Plans and Programs – Within 3 months of the submission of an Independent Audit under condition B33 and B34.</p>		Open
C26	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.	<p>Observation: Erosion and Sediment Control Plan (ESCP) dated 21 April 2023 has not been updated since April to reflect the current erosion and sediment controls on site.</p> <p>Proposed action: Update the ESCP to include the current erosion and sediment controls implemented on site. Prior to the finalisation of this audit report, it was indicated by the Contractor (PBG) that the CSWMSP has been updated and notification of the revised Plan will be provided to the Planning Secretary in accordance with condition C38: Revision of Strategies, Plans and Programs.</p>	<p>Completed action: CSWMSP updated to Revision 4 with updated project ERSED plan incorporating Stage 2 drainage pits.</p> <p>Proposed Action: Submission of a revised ESCP will be undertaken as part of SSSA consent condition C38 Revision of Strategies, Plans and Programs – Within 3 months of the submission of an Independent Audit under condition B33 and B34.</p>		Open