



## **Independent Environmental Audit Report 3 (IA3)**

**Deicorp Construction Pty Ltd**

**Tallawong Station Precinct South (SSD 10425)**

**Rouse Hill NSW**



**Audit Date: 10 October 2022**

**Morasey Ref: MEDEI: 2022100-03**

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## Independent Environmental Audit Report 3 (IA3)

Deicorp Construction Pty Ltd

Tallawong Station Precinct South (SSD 10425)

Rouse Hill NSW

Document Quality Management Details.	
<b>Report Name:</b>	Independent Environmental Audit Report 3 (IA3)
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<b>Project Number:</b>	2022100-03
<b>Client Name:</b>	Deicorp Construction Pty Ltd
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Revision	Date Prepared	Prepared By	Summary of Revision
DRAFT	3.11.2022	Morasey Environment Pty Ltd	Draft submission to client for review
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Auditor Details	
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## Executive Summary

This report presents the findings of the third Independent Environmental Audit (IA3) conducted by Morasey Environment Pty Ltd commencing on Monday 10<sup>th</sup> October 2022 for the Deicorp Tallawong Station Precinct South Project located in Rouse Hill NSW. The temporal period covered by the audit is between the date of the second Independent Audit (IA2) on 21 April 2022 to the date of the site inspection for this Independent Audit 3 (IA3), 10 October 2022. The environmental performance of the project was assessed at the time of the site inspection on 10 October 2022.

The details of the Development are as follows:

<b>Application Number:</b>	SSD 10425
<b>Applicant:</b>	Deicorp Construction Pty Ltd
<b>Consent Authority:</b>	Minister for Planning and Public Spaces
<b>Site:</b>	1-15 and 2-12 Conferta Avenue, Rouse Hill NSW Lots 293 and 294/DP 1213279
<b>Date of Consent:</b>	20 July 2021
<b>Development:</b>	Construction of a staged mixed-use development (Tallawong Station Precinct South) comprising: <ul style="list-style-type: none"> <li>• 17 buildings of between two and eight storeys to a maximum height of 34.69 m (RL 91.600)</li> <li>• maximum gross floor area (GFA) of 93,393 m<sup>2</sup></li> <li>• 987 dwellings</li> <li>• retail, commercial and community uses of approximately 9,000 m<sup>2</sup> GFA</li> <li>• 5% affordable housing (50 dwellings)</li> <li>• basement for car parking and services</li> <li>• land and stratum subdivision</li> <li>• landscaping of the public and private domain</li> <li>• publicly accessible park</li> <li>• new public and private roads and pedestrian connection</li> </ul>

The purpose of this audit was to undertake the necessary assessment and review of compliance with SSD 10425 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Construction Environmental Management Plan (CEMP). Specifically, this audit was required to satisfy Condition A23 of SSD 10425 which requires Independent Audits of the development to be carried out in accordance with the Independent Audit Post Approval Requirements (IAPARs) prepared by the NSW Department of Planning and Environment (DPE), dated May 2020.

This Audit has been conducted in accordance with the IAPARs, and AS/NZS ISO 19011:2014 – Guidelines for Auditing Management Systems. The IAPARs require Independent Audits to be conducted every 26 weeks during Construction, until which time the project becomes operational.

The audit includes an assessment of compliance with Conditions of Approval (CoA) in Part A Administrative Conditions, and Part D During Construction, of SSD 10425. The audit also

includes an assessment of compliance with selected mitigation measures in the Project CEMP and Sub-Plans. Additional CoAs were verified for compliance during the audit, as requested by government agencies during consultation. A summary of non-compliances has been presented in the table below.

**Summary of Non-Compliances - SSD 10425– IA3**

CoA	Summary of Non-Compliance – IA3 – Conditions of Approval
A26	The IA2 Audit Report was not available on the project website at the time of IA3: <a href="https://tallawongda.northwestvillage.com.au/">https://tallawongda.northwestvillage.com.au/</a>
D23	There were no ERSED controls in place along the swale, which was created with bare earth, potentially increasing sediment load prior to discharge to the stormwater system.  Drainage rock had been applied by a previous contractor around the stormwater inlet outside the site on the corner of Schofields and Cudegong Road.
D25	At the time of IA3, there was no evidence of water quality sampling being conducted during the discharge of water from Site 2.
Section	Summary of Non-Compliance – IA3 – CEMP and Sub-Plans
<b>CEMP, Tallawong Station Precinct South – Site 2, 30 May 2022</b>	
Section 10 Soil and Water Management	There were no ERSED controls in place along the swale, which was created with bare earth, potentially increasing sediment load prior to discharge to the stormwater system.  Drainage rock had been applied by a previous contractor around the stormwater inlet outside the site on the corner of Schofields and Cudegong Road.
<b>Dewatering Management Plan (DMP) – Site 1 &amp; 2</b>	
Section 4.4 Dewatering Method	The preparation of a Site Dewatering Strategy was in progress at the time of the audit. Deicorp were in the process of engaging a specialist to provide advice on water treatment options / equipment required, based on the first round of water quality monitoring results for Site 2, which were pending at the time of this IA3.  As excavation had already commenced at the time of this IA3, the project was Non-Compliant with Section 4.4 of the DMP at the time of the audit for Site 2.
Section 5.3 Groundwater Quality Monitoring	Dewatering had commenced on Site 2 at the time of audit, though visual monitoring requirements as documented in the DMP had not yet been implemented.

The audit also included a high-level assessment of adequacy of the project CEMP and Sub-Plans. The implementation of the CEMP was considered to be adequate. A number of Observations were raised, presented in the table below.

CoA	Summary of Observation – IA3
C39 (c) & (e)	(c) <b>The Groundwater Monitoring Report does not include analysis of results, or a discussion of graphs which indicate a possible overall trend of decreasing groundwater levels during construction. Validation of the accuracy of the seepage model has not been confirmed.</b>  (e) As outlined in EI’s Letter, 5/8/2021, a <b>DMP for the operational phase will be</b>

CoA	Summary of Observation – IA3
	<p><b>developed following construction of the basement.</b> This will take into account water quality and volumes identified during basement construction. It will specifically outline the monitoring and reporting schedule.</p>
D28	<p>During the site inspection trucks were parked up along the hoarding outside the site on Conferta Avenue to pump concrete and for other materials deliveries.</p> <p>The former nature strip (in use as a loading/work zone) had been concreted.</p> <p>An email from Blacktown City Council, dated 8/9/2022 was provided as evidence of approval for use of the area as a Work Zone until <b>26 August 2023</b> subject to terms and conditions and payment.</p> <p>Acknowledgement of receipt of payment was included in a further email, dated 17/10/2022.</p> <p><b>It is not clear whether the work zone was in use for a period where conditions were not met but this is considered a matter for Council to verify.</b></p>
D29	<p>At the time of site inspection one lane was closed on Conferta Avenue to allow room for trucks to load spoil and pump concrete (see description for D28). Traffic control was in place.</p> <p><b>Deicorp advised the Work Zone approval (refer D28) also covers the lane closure, though associated Plans attached to the Work Zone approval were not made available for review.</b></p>
DMP, 5.3.4 Discharge Flow and Volume Monitoring	<p>A flow meter had been installed on Site 1 to measure the rate and volume of water discharged from the basement excavation.</p> <p>EIA indicated an assessment of these records would be undertaken to calculate the actual groundwater volume discharged from the site and will be included in <b>the final Dewatering Completion Report</b> (Section 5.3.3) to be issued to Council and DPE Water after the completion of dewatering activities.</p> <p><b>Another assessment would be undertaken after 12 months of pumping to calculate the actual volume of groundwater discharged from Site 1 during Construction (to validate WAL limits have not been exceeded).</b></p>
DMP, 5.4 Groundwater Treatment	<p>As dewatering had just commenced on Site 2 at the time of IA3, the measures as described in Section 5.4 Groundwater Treatment of the DMP will be assessed in IA4.</p>
CNVMP, 5.6 Vibration monitoring	<p>Vibration monitoring is recommended when rock hammering is required to be undertaken (generally limited to the excavation stage of the project) at the following locations:</p> <ul style="list-style-type: none"> <li>• Eastern boundary of the site – representative of the switching station</li> <li>• Southern boundary of the site – representative of worst affected residents</li> </ul> <p><b>For Site 2, Deicorp advised no rock hammering has been required to date, so requirement to conduct vibration monitoring has not been triggered.</b></p>
CNVMP, 5.6.5 Additional Recommendations	<p>Trucks and bobcats to use non-tonal reversing beacon (subject to WHS requirements) to minimise potential disturbance to neighbours.</p> <p><b>Plant Pre-Start checks did not include the verification of reversing travel alarms.</b></p>

A comparison of predictions of environmental impact in environmental assessment documentation with actual project environmental impacts during construction was conducted. Overall, predicted impacts were found to align with the actual impacts relevant to the site during construction.

The outcome of the audit indicated a good effort by the Deicorp project team on achieving compliance with conditions from Parts A and D of SSD 10425, and mitigation measures in the CEMP and Sub-Plans. Overall, **three Non-Compliances with SSD 10425** were identified (from a total of 78 conditions assessed), and **three Non-Compliances with the CEMP and Sub-Plans** (from a total of 21 mitigation measures assessed).

Non-compliances were raised in relation to erosion and sediment control, with recommendations made to review and implement the Soil and Water Management Plan for Site 2.

The management of groundwater was an ongoing risk at the site, though significant improvements to processes and implementation were noted since the last Independent Audit. Records were maintained to support the position that groundwater take volumes do not trigger Water Access Licence (WAL) requirements. Further assessment of operational groundwater take requirements is noted to be due for verification within 12 months of groundwater take commencement.

The process for dewatering surface water to stormwater from the site was an ongoing issue, and no water quality monitoring data was available for Site 2 at the time of IA3. Water quality monitoring records provided as evidence for Site 1 were deemed to be adequate to demonstrate due diligence, though clearer documentation of the decision making process prior to discharge is recommended to ensure compliance.

The management of soil and groundwater contamination under a Remediation Action Plan (RAP) was complete for Site 1 and ongoing for Site 2, under the management of qualified land contamination consultants and an EPA Site Auditor.

The implementation of controls for all other environmental aspects assessed during the audit were deemed to be adequate and associated environmental risks were relatively low.

The auditor would like to thank the auditees for their time during the audit.

# Independent Environmental Audit Report 2

Deicorp Construction Pty Ltd

Tallawong Station Precinct South (SSD 10425)

Rouse Hill NSW

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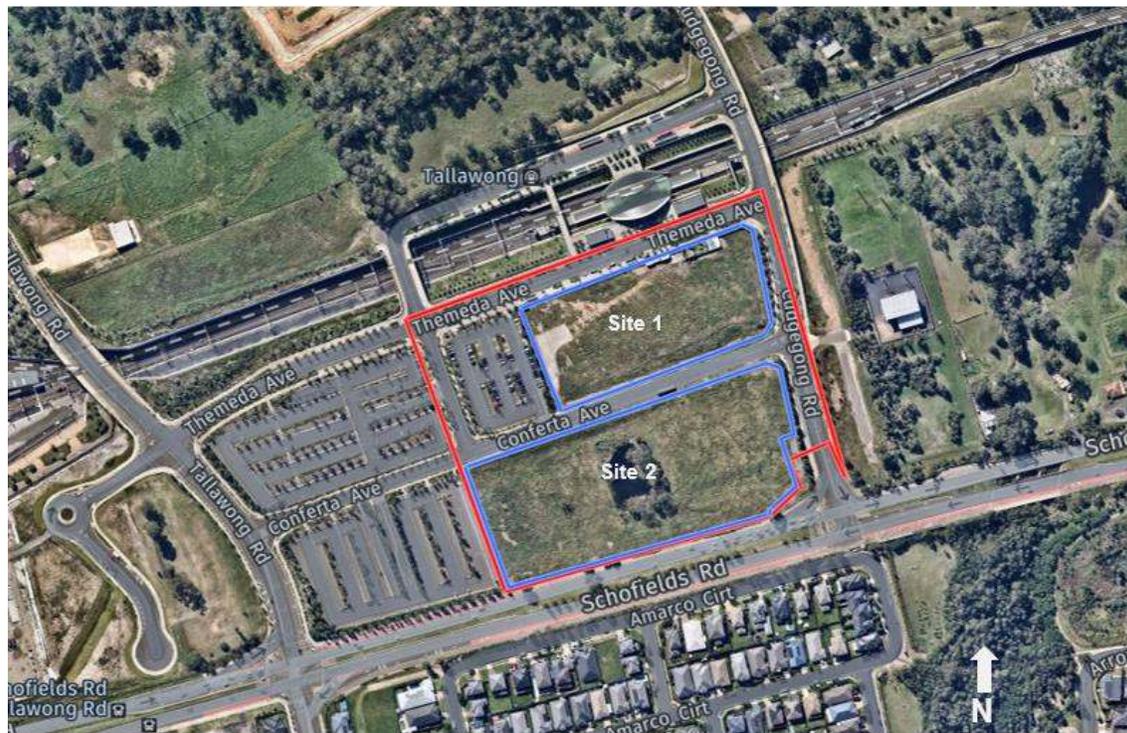
# 1. Introduction

This report presents the findings of the third Independent Environmental Audit (IA3) conducted by Morasey Environment Pty Ltd commencing on Monday 10<sup>th</sup> October 2022 for the Deicorp Tallawong Station Precinct South Project located in Rouse Hill NSW. The project was approved as a State Significant Development (SSD 10425) on 20<sup>th</sup> July 2021.

## 1.1 Project Description and Location

The project site that is the subject of this audit is Site 1 and Site 2 of the Deicorp Construction Pty Ltd mixed-use development located between Themeda Avenue to the north, Schofields Road to the south, and Cudgegong Road to the east, Rouse Hill NSW.

The development is located in Tallawong Station Precinct South approximately 16km from the Parramatta CBD, and 1.7km from the commercial centre of Rouse Hill in the Blacktown City Council Local Government Area (LGA). The Site 1 development is situated directly to the south of the Sydney Metro Northwest Tallawong Railway Station on Themeda Ave, and 700m southeast of the Sydney Metro stabling facility. A 1,000 space Metro commuter car park is located immediately to the west of Site 1 and Site 2. **Figure 1** below depicts an aerial view of the site.



**Figure 1: Tallawong Station Precinct South SSD 10425 Site Location, Source: Nearmap / DPIE Environmental Assessment**

The project involves the construction of a staged mixed-use development (Tallowong Precinct South) comprising:

- 17 buildings of between two and eight storeys to a maximum height of 34.69m (RL 91.600)
- Maximum gross floor area (GFA) of 93,393m<sup>2</sup>
- 987 dwellings
- Retail, commercial and community uses of approximately 9,000m<sup>2</sup> GFA
- 5% affordable housing (50 dwellings)
- Basement for car parking and services
- Land and stratum subdivision
- Landscaping of the public and private domain
- Publicly accessible park, and
- New public and private roads and pedestrian connection.

As noted in the Department's Assessment, *"the proposal will deliver new housing and a new local retail and commercial centre, supported by infrastructure, open space, and public transport consistent with the strategic planning objectives for the North West growth area"*. The proposed built form *"will deliver a high-quality development that would make a positive contribution to the existing and emerging character of the surrounding area"*.

### 1.1.1 SSD Approval

Details of the Development are as follows:

<b>Application Number:</b>	SSD 10425
<b>Applicant:</b>	Deicorp Construction Pty Ltd
<b>Consent Authority:</b>	Minster for Planning and Public Spaces
<b>Site:</b>	1-15 and 2-12 Conferta Avenue, Rouse Hill NSW Lots 293 and 294/DP 1213279
<b>Date of Consent:</b>	20 July 2021

The proposal is State Significant Development (SSD) under Section 4.36 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as the development has a Capital Investment Value (CIV) in excess of \$30 million (\$332 million) and is for the purpose of commercial premises and residential accommodation associated with railway infrastructure under clause 19(2)(a) of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

## 1.2 Audit Objectives

The purpose of this audit was to undertake the necessary assessment and review of compliance with SSD 10425 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Construction Environmental Management Plan (CEMP) and Sub-Plans.

### 1.3 Scope

The scope of the audit included:

- Assessment of compliance with the Project Conditions of Approval, Parts A & D of SSD 10425;
- An assessment of the environmental performance of the development, including:
  - Actual impacts compared to predicted impacts in the Environmental Assessment and Environmental Impact Statement (EA & EIS)
  - Incidents, non-compliances and complaints that occurred or were made during the audit period, and
  - The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit.
- A high-level assessment of the adequacy of the project's CEMP and Sub-Plans, and
- Any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

#### 1.3.1 Audit Period

The audit period is between the date of IA2 on 20 April 2022 to the date of the site inspection for this Independent Audit 3 (IA3), 10 October 2022. The status of site documentation was confined in time to between these dates. The environmental performance of the project was assessed at the time of the site inspection on 10 October 2022.

#### 1.3.2 Auditor Approval and Declaration of Independence

The audit was conducted by Josephine Heltborg (Exemplar Global Certified Principal Environmental Auditor, Certificate No. 111000) of Morasey Environment Pty Ltd, approved by the Department of Planning and Environment (the Department | DPE) in correspondence dated 29 September 2021. The Department's Letter of Agreement to the Independent Auditor is included as **Attachment 2**.

The Auditor has no other involvement or role on the Project and is independent of the Proponent and Principal Contractor (Deicorp). The Auditor's Declaration of independence is included as **Attachment 3**.

## 1.4 Regulatory / Approval Requirements

The main regulatory instrument that applies to the site is the Development Consent, issued to Deicorp Construction Pty Ltd by the Minister for Planning and Public Spaces (SSD 10425), pursuant to Section 4.38 of the *Environmental Planning and Assessment Act 1979*, dated 20 July 2021, subject to a number of approval conditions. As required by Condition A23 of SSD 10425, Independent Audits of the development must be carried out:

***“Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).”***

The Department’s Independent Audit Post Approval Requirements (2020) require the Initial Independent Audit to be conducted within 12 weeks of the commencement of construction, and ongoing Independent Audits to be conducted every 26 weeks until which time the project becomes operational. After this time, operational Independent Environmental Audits would be conducted every three years.

A Concept Plan (SSD 9063) was previously approved for the site on 21 February 2019. The Environmental Impact Statement (EIS) found the proposal is consistent with the State *Environmental Planning Policy (SEPP) (Sydney Regional Growth Centres) 2006* as well as the relevant key development standards and the specific objectives and design principles of the approved Concept Plan.

## 1.5 Methodology

The Audit was conducted in accordance with the Independent Audit Post Approval Requirements (IAPARs) prepared by the NSW DPIE, dated May 2020, and AS/NZS ISO 19011:2014 – Guidelines for Auditing Management Systems.

The audit included an inspection of the active works being conducted on Monday 10 October 2022, and interviews with key Deicorp site and management personnel. The audit included the review of project documentation and records maintained both on site, and subsequent requests for information maintained off site. The audit attendee list for the opening and closing meetings is included as **Attachment 4** and photographs from the site inspection are included in **Section 5**.

The Audit Table is included in **Attachment 1** and was used to assess compliance with SSD 10425 as follows:

- **Part A:** Administrative Conditions (Conditions A1-A31)
- **Part B:** NA
- **Part C:** Prior to Commencement of Works (Conditions C33 & C39)
- **Part D:** During Construction (Conditions D1-D44)

The compliance status of each requirement in the Audit Table was determined using the descriptors below:

- **Compliant:** The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
- **Non- Compliant:** The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
- **Not Triggered:** A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

In addition to the compliance status descriptors, observations and notes are made, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the development.

The audit also included an assessment of compliance with management plans, and a comparison of predictions of environmental impact in environmental assessment documentation with actual project environmental impacts.

The following Auditees were present during the Audit:

- Carl Hely, Deicorp Site Manager
- Mark Liang, Deicorp Contracts Administrator
- John Ekonomou, Deicorp Project Manager, Site 1
- Grant Madsen, Deicorp Project Manager, Site 2

### 1.5.1 Agency Consultation

Section 3.2 of the IAPARs requires the auditor to “consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit”.

The NSW Department of Planning and Environment (DPE), Blacktown City Council, and DPE Water were consulted via email on 21 September 2022. The agencies consulted had no comments in relation to further areas to consider during the audit.

Evidence of consultation is included in **Attachment 5**.

### 1.5.2 Audit Preparation and Document Review

The primary documents reviewed as part of the audit scope are listed below:

- AECOM Air Quality Management Plan (AQMP), Tallawong Station South Precinct, Job No.: 60618532, Rev 2, 13/5/2022
- Acoustic Logic Construction Noise and Vibration Management Plan (CNVMP), Ref 20210646.1/1907A/R1/RF, Rev1, 19/7/2021
- Acoustic Logic Construction Noise and Vibration Management Plan (CNVMP), Tallawong Station Precinct – Site 2, Rev 0, 13/5/2022
- Barker Ryan Stewart Construction Environmental Management Plan (CEMP), Tallawong Station Precinct South – Site 2, Project No. SY190226, Final, 30/5/2022
- Deicorp SM-03 (Rev A) Site Management Plan (Construction Works) Site 2
- Barker Ryan Stewart Construction Pedestrian and Traffic Management Plan (CPTMP) – Tallawong Station Precinct South – Site 2, Rev13 Final 28/5/2022
- Sky Engineering Soil and Water Management Plan (SWMP) / Erosion and Sediment Control Plan (ESCP), Sheets 1, 2 & 3, 1-15 & 2-12 Conferta Ave, Rouse Hill, 20/5/2022
- Barker Ryan Stewart Construction Waste Management Plan (CWMP), Tallawong Station Precinct South – Site 2, Rev2 Final, 26/5/2022
- City Plan Construction Certificate No. 210348/1, dated 31/8/2021 (CC1) – Stage 1 Early Works
- City Plan Construction Certificate No. 210348/2, dated 22/12/2021 (CC2) – Stage 1 (Site 1A & 1B) Basement
- City Plan Construction Certificate No. 210348/3, dated 20/7/2022 (CC3) - Stage 2 Early Works (bulk excavation, shoring & piling) (Sites 2A, 2B, 2C, 2E & 2D)
- City Plan Construction Certificate No. 201348/4, dated 25/8/2022 (CC4) – Stage 1 Structure
- City Plan Construction Certificate No. 201348/5, dated 14/10/2022 (CC5) – Stage 1 Façade & Fitout
- Department of Planning Industry and Environment (DPIE) Stage 2 – Detailed Development Application and Modification Application State Significant Development Assessment SSD 9063 MOD 1 & SSD 10425, July 2021
- Deicorp Community Communication Strategy, Tallawong Village Precinct, Rev2, dated 15/07/2021
- Development Consent, State Significant Development (SSD) 10425, Instrument of Approval, dated 20 July 2021
- EI Australia Additional Groundwater Investigation, Ref E24445.E17\_Rev0, 1/10/2020
- EI Australia Dewatering Management Plan, Tallawong Site 1, Rev0, dated 26/3/2021

- El Australia Dewatering Management Plan, Tallawong Station Precinct South, Rouse Hill NSW - Site 2, Rev1, dated 5/8/2021
- El Australia Detailed Site Investigation, Ref: E24445.E02, Rev2, 1/5/2020
- El Australia Groundwater Monitoring Report No. 1, Proposed Residential Development, Site 1, Tallawong Station Precinct South, Rouse Hill NSW, E24445.G11.GW01, 19/10/2022
- El Australia Groundwater Take Assessment, SSD 10425, dated 30/9/2020
- El Australia Groundwater Take Assessment, Tallawong Station Precinct South, Rouse Hill NSW, E24445.G12\_Rev1, dated 30/7/2021
- El Australia Remediation Action Plan, Tallawong Station Precinct South, Rouse Hills NSW, Ref: E24445.E06, Rev1, 16/4/2020
- Sutherland & Associates Planning Environmental Impact Statement SSD 10425, May 2020

Other documents and records sighted during the audit are referenced in the Audit Table against each Condition in **Attachment 1**.

Additional audit preparation activities included:

- Preparation of an Audit Plan
- Development of Audit Checklists
  - SSD 10425 Conditions of Approval
  - Selected mitigation measures documented in the Project CEMP and Sub-Plans

## 2. Limitations

The audit has been prepared in accordance with the associated proposal and Morasey's Terms and Conditions. This report is for the sole purposes of the Client. Except as required by law, no third party may use or rely on this Report unless otherwise agreed by Morasey in writing.

The site inspection component of the audit was limited to observable aspects that could be noted during a 'walk through' inspection of the construction site. Sampling or monitoring was not included in the scope of this audit. Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The matters raised in this report are only those which came to our attention during the course of performing our assessment and are not necessarily a comprehensive statement of all the weaknesses that may exist or improvements that might be made. Our work is performed on a sample basis; we cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of construction/operation and their responsibility to prevent and detect irregularities.

Recommendations and suggestions for improvement should be assessed by management for their full commercial impact before they are implemented. We have generally used and relied upon information supplied as being regarded as authoritative and reliable, but no warranty of completeness, accuracy, or reliability is given. The document review conducted during this assessment was limited to those documents and information supplied as part of the audit. The audit scope did not include the independent verification of these sources unless otherwise noted within the report. The scope of this audit does not extend to the verification of items assessed by the Certifier prior to issuing of a certificate for any stage. Morasey will not accept any liability for inaccurate conclusions if the information provided was incomplete, inaccurate, withheld, misrepresented or otherwise not fully disclosed.

To the best of Morasey's knowledge, the facts and matters described in this report reasonably represent the Client's intentions at the time of which Morasey issued the report to the Client. However, the passage of time, the manifestation of latent conditions or the impact of future events (including a change in applicable law) may have resulted in a variation of the report and its possible impact. Morasey will not be liable to update or revise the report to take into account any events or emergent circumstances or facts occurring or becoming apparent after the date of issue of the report.

This Report does not purport to give legal advice; legal advice can only be given by qualified legal practitioners. To the extent permitted by law, Morasey expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report (including without limitation matters arising from any negligent act or omission of Morasey). Morasey does not admit that any action, liability or claim may exist or be available to any third party.

### 3. Audit Findings

The following sections provide a summary of the findings of the audit. The Audit Table is provided in **Attachment 1** and includes details of the evidence collected, observed and provided in support of compliance with the audit criteria. Evidence collected during the site inspection and interviews with personnel on 10 October 2022 has also been included.

#### 3.1 Compliance Status - SSD 10425 (including Proponent Response)

During the audit, three Non-Compliances with SSD 10425 were identified (from a total of 78 conditions assessed). Two Non-Compliances with the CEMP and Sub-Plans were identified (from a total of 21 mitigation measures assessed). Eight Observations/Opportunities for improvement were raised.

Non-Compliances are summarised in **Table 1** below, including recommendations to address each Non-Compliance. As requested by DPE, Deciorp’s response to each recommendation will be addressed separately and submitted to the Department.

**Table 1: Summary of Non-Compliances SSD 10425 – IA3**

CoA#	Summary of Non-Compliance	Recommended Action Due Date Status
A26	The IA2 Audit Report was not available on the project website at the time of IA3: <a href="https://tallawongda.northwestvillage.com.au/">https://tallawongda.northwestvillage.com.au/</a>	<b>Recommended Action:</b> Upload a copy of the IA3 Audit Report to the project website within 60 days of submission to the Planning Secretary. <b>Due Date:</b> Within 60 days of submission of the IA3 Audit Report to the Planning Secretary <b>Status:</b> OPEN
D23	There were no ERSED controls in place along the swale, which was created with bare earth, potentially increasing sediment load prior to discharge to the stormwater system. Drainage rock had been applied by a previous contractor around the stormwater inlet outside the site on the corner of Schofields and Cudegong Road.	<b>Recommended Action:</b> Review and implement the Soil and Water Management Plan to reduce the risk of sediment entering the stormwater system. <b>Due Date:</b> 15/11/2022 <b>Status:</b> OPEN
D25	At the time of IA3, there was no evidence of water quality sampling being conducted during the discharge of water from Site 2.	<b>Recommended Action:</b> Implement the Dewatering Management Plan for Site 2 to ensure compliance with Condition D25. <b>Due Date:</b> 15/11/2022 <b>Status:</b> OPEN

Non-Compliances with the CEMP and Sub-Plans are summarised in **Table 2** below, including recommendations to address each Non-Compliance.

**Table 2: Summary of Non-Compliances – CEMP & Sub-Plans – IA3**

CoA#	Summary of Non-Compliance	Recommended Action Due Date Status
<b>CEMP, Tallawong Station Precinct South – Site 2, 30 May 2022</b>		
Section 10 Soil and Water Management	<p>There were no ERSED controls in place along the swale, which was created with bare earth, potentially increasing sediment load prior to discharge to the stormwater system.</p> <p>Drainage rock had been applied by a previous contractor around the stormwater inlet outside the site on the corner of Schofields and Cudegong Road.</p>	<p><b>Recommended Action:</b> Review and implement the Soil and Water Management Plan to reduce the risk of sediment entering the stormwater system.</p> <p><b>Due Date:</b> 15/11/2022</p> <p><b>Status:</b> OPEN</p>
<b>Dewatering Management Plan (DMP) – Site 1 &amp; 2</b>		
Section 4.4 Dewatering Method	<p>The preparation of a Site Dewatering Strategy was in progress at the time of the audit. Deicorp were in the process of engaging a specialist to provide advice on water treatment options / equipment required, based on the first round of water quality monitoring results for Site 2, which were pending at the time of this IA3.</p> <p>As excavation had already commenced at the time of this IA3, the project was Non-Compliant with Section 4.4 of the DMP at the time of the audit for Site 2.</p>	<p><b>Recommended Action:</b> Finalise and agree on the Dewatering Strategy for Site 2 in accordance with Section 4.4 Dewatering Method of the DMP.</p> <p><b>Due Date:</b> 15/11/2022</p> <p><b>Status:</b> OPEN</p>
Section 5.3 Groundwater Quality Monitoring	<p>Dewatering had commenced on Site 2 at the time of audit, though visual monitoring requirements as documented in the DMP had not yet been implemented.</p>	<p><b>Recommended Action:</b> Conduct and record visual inspections (daily where possible) for Site 2 in accordance with Section 5.3 Groundwater Quality Monitoring of the DMP.</p> <p><b>Due Date:</b> 15/11/2022</p> <p><b>Status:</b> OPEN</p>

Observations are summarised in **Table 3** below, including recommendations to address each observation.

**Table 3: Summary of Observations SSD 10425 – IA3**

CoA# / Plan Reference	Summary of Observation	Recommended Action Due Date Status
C39 (c) & (e)	<p>(c) <b>The Groundwater Monitoring Report does not include analysis of results, or a discussion of graphs which indicate a possible overall trend of decreasing groundwater levels during construction. Validation of the accuracy of the seepage</b></p>	<p><b>Recommended Action:</b> Provide an analysis of groundwater level data, including potential effects of groundwater drawdown, if relevant, and validation of the accuracy of the seepage</p>

CoA# / Plan Reference	Summary of Observation	Recommended Action Due Date Status
	<p><b>model has not been confirmed.</b></p> <p>(e) As outlined in EI's Letter, 5/8/2021, a <b>DMP for the operational phase will be developed following construction of the basement.</b> This will take into account water quality and volumes identified during basement construction. It will specifically outline the monitoring and reporting schedule.</p>	<p>model.</p> <p>Ensure a DMP for the operational phase is developed following construction of the basement.</p> <p><b>Due Date:</b> NA</p> <p><b>Status:</b> NA</p>
D28	<p>During the site inspection trucks were parked up along the hoarding outside the site on Conferta Avenue to pump concrete and for other materials deliveries.</p> <p>The former nature strip (in use as a loading/work zone) had been concreted.</p> <p>An email from Blacktown City Council, dated 8/9/2022 was provided as evidence of approval for use of the area as a Work Zone until <b>26 August 2023</b> subject to terms and conditions and payment.</p> <p>Acknowledgement of receipt of payment was included in a further email, dated 17/10/2022.</p> <p><b>It is not clear whether the work zone was in use for a period where conditions were not met but this is considered a matter for Council to verify.</b></p>	<p><b>Recommended Action:</b> Ensure a current Work Zone approval is in place at all times where required.</p> <p><b>Due Date:</b> NA</p> <p><b>Status:</b> NA</p>
D29	<p>At the time of site inspection one lane was closed on Conferta Avenue to allow room for trucks to load spoil and pump concrete (see description for D28). Traffic control was in place.</p> <p><b>Deicorp advised the Work Zone approval (refer D28) also covers the lane closure, though associated Plans attached to the Work Zone approval were not made available for review.</b></p>	<p><b>Recommended Action:</b> Ensure a current approval is in place for lane closures at all times where required.</p> <p><b>Due Date:</b> NA</p> <p><b>Status:</b> NA</p>
DMP, Discharge and Monitoring 5.3.4 Flow Volume	<p>A flow meter had been installed on Site 1 to measure the rate and volume of water discharged from the basement excavation.</p> <p>EIA indicated an assessment of these records would be undertaken to calculate the actual groundwater volume discharged from the site and will be included in <b>the final Dewatering Completion Report</b> (Section 5.3.3) to be issued to Council and DPE Water after the completion of dewatering activities.</p> <p><b>Another assessment would be undertaken</b></p>	<p><b>Recommended Action:</b> Ensure a flow meter is installed at Site 2, and records maintained to ensure compliance with the DMP Section 5.3.4 Discharge Flow and Volume Monitoring</p> <p><b>Due Date:</b> NA</p> <p><b>Status:</b> NA</p>

CoA# / Plan Reference	Summary of Observation	Recommended Action Due Date Status
	<p><b>after 12 months of pumping to calculate the actual volume of groundwater discharged from Site 1 during Construction (to validate WAL limits have not been exceeded).</b></p>	
<p>DMP, Groundwater Treatment 5.4</p>	<p>As dewatering had just commenced on Site 2 at the time of IA3, the measures as described in Section 5.4 Groundwater Treatment of the DMP will be assessed in IA4.</p>	<p><b>Recommended Action:</b> Implement the DMP Section 5.4 Groundwater Treatment prior to the next Independent Audit (IA4) <b>Due Date:</b> NA <b>Status:</b> NA</p>
<p>CNVMP, Vibration monitoring 5.6</p>	<p>Vibration monitoring is recommended when rock hammering is required to be undertaken (generally limited to the excavation stage of the project) at the following locations:</p> <ul style="list-style-type: none"> <li>•Eastern boundary of the site – representative of the switching station</li> <li>•Southern boundary of the site – representative of worst affected residents</li> </ul> <p><b>For Site 2, Deicorp advised no rock hammering has been required to date, so requirement to conduct vibration monitoring has not been triggered.</b></p>	<p><b>Recommended Action:</b> Ensure vibration monitoring is conducted at the southern and eastern boundaries of Site 2 in the event rock hammering is required. Comply with Section 5.6 Vibration monitoring of the CNVMP. <b>Due Date:</b> NA <b>Status:</b> NA</p>
<p>CNVMP, Additional Recommendations 5.6.5</p>	<p>Trucks and bobcats to use non-tonal reversing beacon (subject to WHS requirements) to minimise potential disturbance to neighbours.</p> <p><b>Plant Pre-Start checks did not include the verification of reversing travel alarms.</b></p>	<p><b>Recommended Action:</b> Update the Plant Pre-Start Checklist to include the requirement for reversing quackers for all plant and equipment where relevant <b>Due Date:</b> NA <b>Status:</b> NA</p>

NB: Observations are not considered Non-Compliances but are opportunities for improvement.

### 3.2 Review of Environmental Performance

#### 3.2.1 Actual vs Predicted Impacts

An assessment of actual impacts compared with predicted impacts documented in the Environmental Impact Statement (EIS), prepared by Sutherland & Associates Planning, dated May 2020 was conducted. Section 9.18 of the EIS sets out an Environmental Risk Assessment conducted for the proposed development derived from *AS4369.1999 Risk Management and Environmental Risk Tools*.

Overall, predicted impacts were found to align with the actual impacts relevant to the site during construction. A summary of the findings of the assessment, including residual impact ratings is provided in **Table 3** below.

**Table 3: Actual vs Predicted Impacts in the EIS (During Construction)**

EIS Predicted Impact	Assessment of Actual vs Predicted Impacts
Biodiversity	<p><b>Potential Environmental Impact:</b> Loss of vegetation within the site. Potential to impact on biodiversity of the site.</p> <p><b>Proposed Mitigation Measures and/or comment:</b> Site is biodiversity certified. Vegetation to be removed during construction will be replaced with new planting as illustrated in the landscape plan which accompanies the application.</p> <p><b>Residual Impact:</b> Low/Medium</p> <p><b>Actual Impacts (IA3 Assessment):</b> The project must comply with the Tree Audit and Impact Assessment Report.</p>
Stormwater	<p><b>Potential Environmental Impact:</b> Potential water quality.</p> <p><b>Proposed Mitigation Measures and/or comment:</b> Implement stormwater drainage infrastructure as designed by AECOM in accordance with the Integrated Water Cycle Management Strategy – Tallawong Station Precinct South prepared by AECOM.</p> <p><b>Residual Impact:</b> Low/Medium</p> <p><b>Actual Impacts (IA3 Assessment):</b> Stormwater drainage infrastructure works had not commenced at the time of IA3.</p>
Soil and contamination	<p><b>Potential Environmental Impact:</b> Exposure of contamination or hazardous materials during construction.</p> <p><b>Proposed Mitigation Measures and/or comment:</b> Implement Remediation Action Plan during construction.</p> <p><b>Residual Impact:</b> Low/Medium</p> <p><b>Actual Impacts (IA3 Assessment):</b> The RAP, dated 16/4/2020 was provided as evidence during the audit, as well as an Additional Groundwater Investigation, dated 1/10/2020. An EPA Site Auditor had been engaged to verify implementation of the RAP, and to provide Interim Advice and Validation. At the time of IA3, a Site Audit Report (SAR) and Site Audit Statement (SAS) had been issued for Site 1. Site 2</p>

EIS Predicted Impact	Assessment of Actual vs Predicted Impacts
	remediation works had commenced at the time of IA3 under the supervision of the same Site Auditor as for Site 1.
Resources, Water and Energy	<p><b>Potential Environmental Impact:</b> Waste of water, energy and other resources.</p> <p><b>Proposed Mitigation Measures and/or comment:</b> Detention tanks, rainwater tanks and stormwater treatment measures. Waste management plan to be implemented to reduce waste and encourage recycling. Materials selection and energy saving devices. Multiple ESD measures.</p> <p><b>Residual Impact:</b> Low</p> <p><b>Actual Impacts (IA3 Assessment):</b> The project was found to be managing waste during construction in compliance with the mitigation measures in the CWMP.</p>
Noise and vibration	<p><b>Potential Environmental Impact:</b> Noise during construction.</p> <p><b>Proposed Mitigation Measures and/or comment:</b> The acoustic assessment provides that adequate control of construction noise will be achieved through implementation of Construction Management Plan. Subject to finalisation of equipment specifications, appropriate sound minimisation measures will be incorporated within the development.</p> <p><b>Residual Impact:</b> Low/Medium</p> <p><b>Actual Impacts (IA3 Assessment):</b> The project was found to be implementing noise and vibration mitigation measures during construction in compliance with the CNVMP, and relevant conditions of approval. Noise and vibration levels generated, and associated noise and vibration impacts at the time of IA3 were considered to be low, based on the type of activities being conducted, the distance of the site from the nearest sensitive receivers, and the depth of noisy works below ground level (i.e. B3).</p> <p>There had been no known noise or vibration complaints in relation to the site at the time of the audit.</p>
Transport and parking	<p><b>Potential Environmental Impact:</b> Increased traffic and parking on local roads.</p> <p><b>Proposed Mitigation Measures and/or comment:</b> Sufficient parking is provided within the development for the various uses to ensure that the proposal does not result in a detrimental impact on parking on surrounding streets. The proposal is supported by a detailed Traffic and Parking Assessment which has identified that surrounding intersection performance assessed on SIDRA analysis maintains an acceptable level of performance with good remaining capacity.</p> <p><b>Residual Impact:</b> Low/Medium</p> <p><b>Actual Impacts (IA3 Assessment):</b> The EIS states sufficient parking would be provided in the development, which is not accurate. There was no</p>

EIS Predicted Impact	Assessment of Actual vs Predicted Impacts
	<p>parking provision within the development footprints for Site 1 or Site 2, with the exception of heavy vehicles entering the site for construction purposes. Construction related vehicles were observed to be parked on the street and were not using the Metro allocated public parking facility. However, the audit did not identify any issues with transport and parking, or a detrimental impact on parking in the area. No complaints regarding parking are known to have been made in relation to the project.</p>
<p>Hazardous materials</p>	<p><b>Potential Environmental Impact:</b> Potential to encounter asbestos Remediation of contaminated soil. Risk of mishandling of hazardous materials and substances.</p> <p><b>Proposed Mitigation Measures and/or comment:</b> Should asbestos be encountered then it should be removed by a licensed contractor. Remediation of contaminated soil will be undertaken in accordance with the Remediation Action Plan prepared by EI Australia which accompanies this application.</p> <p><b>Residual Impact:</b> Low/Medium</p> <p><b>Actual Impacts (IA3 Assessment):</b> The RAP, dated 16/4/2020 was provided as evidence during the audit, as well as an Additional Groundwater Investigation, dated 1/10/2020. An EPA Site Auditor had been engaged to verify implementation of the RAP, and to provide Interim Advice and Validation at the end of the project. At the time of IA3, a Site Audit Report (SAR) and Site Audit Statement (SAS) had been issued for Site 1. Site 2 remediation works had commenced at the time of IA3 under the supervision of the same Site Auditor as for Site 1.</p>
<p>Sediment and erosion control and air quality</p>	<p><b>Potential Environmental Impact:</b> Potential generation of off-site transmission of sediment, dust and fine particles affecting water quality.</p> <p><b>Proposed Mitigation Measures and/or comment:</b> Implementation of a Construction Management Plan including its provisions relating to erosion and sediment control measures.</p> <p><b>Residual Impact:</b> Low</p> <p><b>Actual Impacts (IA3 Assessment):</b> The audit found the construction activities were being conducted mostly in compliance with the mitigation measures in the CEMP and CSWMP, as well as erosion and sediment control related conditions of approval in SSD 10425. Non-compliances, observations and recommendations for improvement to the management or erosion and sediment control on site have been made in the IA3 Audit Report.</p> <p>Dewatering to stormwater has been assessed separately.</p>

### 3.2.2 Physical extent of the development

The physical extent of the development in comparison with the approved boundary is assessed by a registered surveyor. Deicorp provided copies of survey plans as evidence during the audit to confirm that all works surveyed are correct to the design documentation and boundary. The Work Zone on Conferta Avenue has been approved by Council and no other works were observed outside the project boundary, or other works not known to have been assessed in the EIS.

### 3.2.3 Incidents, Non-Compliances and Complaints

#### a. Incidents

There were no environmental incidents reported during the audit period.

#### b. Non-Compliances

Non-compliances identified during IA3 are summarised in Section 3.1, **Tables 1 & 2**, and Observations in **Table 3**.

There were no additional non-compliances identified during the reporting period.

There were no known notices, orders, penalty notices or prosecutions issued in relation to the consent during the audit period.

#### c. Complaints

A summary of complaints has been included in the Complaints Register, available on the project website (<https://tallawongda.northwestvillage.com.au/>). Deicorp advised that all complaints received during the reporting period were documented in the Complaints Register (which was none at the time of IA3).

### 3.2.4 Findings and recommendations from previous audit

Evidence of implementation of the recommendations from IA2 has been included in the table below.

CoA#	IA1 Summary of Non-Compliance	IA2 Recommendations / Proposed Action	Evidence of Implementation / Status
D25	At the time of the audit only one sample (dated 15/3/2022) was provided as evidence that the treated surface water met ANZG (2018) discharge criteria. The data provided is considered inadequate to demonstrate due diligence and compliance with Condition D25 over the audit period (i.e. since Oct 2021). During this time there has been an La Nina weather event resulting in unprecedented rainfall, up to 300mm per day and few days in 2022 with no rain recorded. A documented and robust water quality monitoring program for the discharge of water	Prepare and implement a Water Quality Monitoring Program for the discharge of surface water from the site.	<p><b>Proponent Response:</b> Surface Water Dewatering Letter, dated 6/5/2022 provided by EIA Australia sets out a dewatering plan for surface water and frequencies, including weekly testing.</p> <p><b>Status:</b> CLOSED</p>

CoA#	IA1 Summary of Non-Compliance	IA2 Recommendations / Proposed Action	Evidence of Implementation / Status
	from the site is required.		
D28	<p>During the site inspection trucks were parked up along the hoarding outside the site on Conferta Avenue. Trucks were receiving spoil being loaded out from inside the site (over the hoarding). Concrete trucks were also parked along the same location pumping concrete from Conferta Avenue over the hoarding into the site.</p> <p>The former nature strip (in use as a loading/work zone) had been concreted.</p> <p>Evidence of an approved work zone for the above activities was requested from Deicorp (RFI2) but not provided.</p>	Obtain approval for the work zone outside the site boundary on Conferta Avenue.	<p><b>Proponent Response:</b> Submitted application to Blacktown Council for the work zone; evidence of approval provided during IA3.</p> <p><b>Status:</b> CLOSED</p>
D29	<p>At the time of site inspection one lane was closed on Conferta Avenue to allow room for trucks to load spoil and pump concrete (see description for D28). Traffic control was in place.</p> <p>Evidence of a ROL or other approval for the lane closure and works creating traffic impacts was requested from Deicorp (RFI2) but not provided.</p>	Obtain approval for lane closure on Conferta Avenue.	<p><b>Proponent Response:</b> Lane closure included in the Work Zone Application to BCC per D28; evidence of approval provided during IA3.</p> <p><b>Status:</b> CLOSED</p>
D30	<p>As per D28, the ‘public way’ along the northern side of Conferta Avenue was obstructed at the time of site inspection by trucks loading out spoil and concrete deliveries.</p> <p>Approvals for the use of this area were requested from Deicorp (RFI2) but not provided.</p>	Obtain approval for the work zone outside the site boundary on Conferta Avenue.	<p><b>Proponent Response:</b> Submitted application to Blacktown Council for the use of the work zone; evidence of approval provided during IA3.</p> <p><b>Status:</b> CLOSED</p>

### 3.2.5 Overview of Environmental Performance

The audit found that the project was overall operating in compliance with identified audit requirements, including the CEMP, Sub-Plans, and SSD conditions of approval.

Non-compliances were raised in relation to erosion and sediment control, with recommendations made to review and implement the Soil and Water Management Plan for Site 2.

The management of groundwater was an ongoing risk at the site, though significant improvements to processes and implementation were noted since the last Independent Audit. Records were maintained to support the position that groundwater take volumes do not trigger Water Access Licence (WAL) requirements. Further assessment of operational groundwater take requirements is noted to be due for verification within 12 months of groundwater take commencement.

The process for dewatering surface water to stormwater from the site was an ongoing issue, and no water quality monitoring data was available for Site 2 at the time of IA3. Water quality monitoring records provided as evidence for Site 1 were deemed to be adequate to demonstrate due diligence, though clearer documentation of the decision making process prior to discharge is recommended to ensure compliance.

The management of soil and groundwater contamination under a Remediation Action Plan (RAP) was complete for Site 1 and ongoing for Site 2, under the management of qualified land contamination consultants and an EPA Site Auditor.

The implementation of controls for all other environmental aspects assessed during the audit were deemed to be adequate and associated environmental risks were relatively low.

Observations raised during the audit are documented in the Independent Audit Table, **Attachment 1**.

### 3.3 Adequacy of the CEMP and Sub-Plans

Deicorp manages the environmental performance of the site under the Construction Environmental Management Plan (CEMP) to fulfil the requirements of the development Conditions of Approval (CoA). The CEMP was updated to incorporate Site 2 in May 2022 and includes the following Sub-Plans:

- Air Quality Management Plan (AQMP),
- Construction Noise and Vibration Management Plan (CNVMP),
- Construction Pedestrian and Traffic Management Plan (CPTMP),
- Construction Waste Management Plan (CWMP), and
- Soil and Water Management Plan (SWMP).

A Dewatering Management Plan (DMP) has also been prepared for the site.

A high-level assessment of the adequacy of the CEMP and Sub-Plans was conducted, as well as an assessment of the implementation of these plans. The CEMP and Sub-Plans were prepared by suitably qualified consultants and addressed relevant project requirements, including SSD 10425 Condition of Approval. No opportunities for improvement were identified.

The implementation of the CEMP and Sub-Plans was considered to be mostly adequate, though three non-compliances with mitigation measures were raised, as well as a number of observations/opportunities for improvement. Refer Section 3.1 and 3.3 of this audit report for details. Observations raised during the audit are documented in the Independent Audit Table, **Attachment 1**.

## 4. Audit Conclusions

The outcome of the audit indicated a good effort by the Deicorp project team on achieving compliance with conditions from Parts A and D of SSD 10425, and mitigation measures in the CEMP and Sub-Plans. Overall, **three Non-Compliances with SSD 10425** were identified (from a total of 78 conditions assessed), and **three Non-Compliances with the CEMP and Sub-Plans** (from a total of 21 mitigation measures assessed).

The auditor would like to thank the auditees for their time during the audit.

## 5. Photographs



Photo 1: Compliant site signage at Site 1 entry

Photo 2: Compliant site signage at Site 2 entry



Photo 3: Site 1 as viewed from Tallawong Metro Station

Photo 4: Hoarding on the northern site boundary along Themeda Ave



**Photos 5:** Clean hardstand western access to Site 2 and traffic control in place for lane closure on Conferta Ave



**Photos 6:** Clean eastern access to Site 2 with rumble grid in place



**Photo 7:** Stockpiling of topsoil, Site 2



**Photo 8:** Water in basement excavation, Site 2. Capping beams installed.



**Photos 9-14:** Dewatering process underway on Site 2 from basement excavations to stormwater. Implementation of the Soil and Water Management Plan required to ensure sediment does not leave site



**Photos 15 & 16:** Sediment fence in place but to be maintained along the southern site boundary, Site 2



**Photo 17:** Concrete pour underway into Site 1 from Conferta Ave work zone



**Photo 18:** ERSED controls in place along Conferta Ave stormwater inlets



Photo 19: Water holding/settling tank, Conferta Ave works zone, Site 1



Photo 20: Flow meter – Site 1



Photos 21 & 22: FRP works and progress, Site 1

## **Independent Environmental Audit Report**

**Deicorp Construction Pty Ltd**

**Tallowong Station Precinct South (SSD 10425)**

**Rouse Hill NSW**

**Attachment 1: Independent Audit Table | IA3**

Audit Table - Tallawong Station Precinct South Independent Audit 3 (IA3), 10 October 2022				
Approval ID (CoA SSD 10425)	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>PART A ADMINISTRATIVE CONDITIONS</b>				
<b>Obligation to Minimise Harm to the Environment</b>				
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development.	<ul style="list-style-type: none"> <li>The findings from this audit</li> </ul>	None	Compliant
<b>Terms of Consent</b>				
A2	The development may only be carried out: a) in compliance with the conditions of this consent b) in accordance with all written directions of the Planning Secretary c) in accordance with the EIS, Rts and any RRFI d) in accordance with the approved plans in the table below (except where modified by the conditions of this consent): (See Development Consent, Pages 7-14).	<ul style="list-style-type: none"> <li>The findings from this audit</li> </ul>	None	Compliant
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and b) the implementation of any actions or measures contained in any such document referred to in Condition A3(a).	<ul style="list-style-type: none"> <li>None</li> </ul>	No written directions from the Planning Secretary	Not Triggered
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(d). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(d), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	<ul style="list-style-type: none"> <li>None</li> </ul>	None	Not Triggered

Audit Table - Tallawong Station Precinct South Independent Audit 3 (IA3), 10 October 2022				
Approval ID (CoA SSD 10425)	Requirement	Evidence Collected	Independent Audit Findings & Recommendations	Compliance Status
<b>Limits on Consent</b>				
A5	This consent will lapse five years from the date the consent is registered on the NSW planning portal unless the works associated with the development have physically commenced.	<ul style="list-style-type: none"> <li>Planning Consent SSD 10425</li> </ul>	Planning Consent SSD 10425 is dated 20/7/2021 Works physically commenced prior to the date of SSD approval (i.e. 2/9/2021)	Compliant
A6	This consent does not approve the following: (a) the detailed fit out and operation of the retail and commercial premises (b) the installation of signage Where required, separate approvals shall be obtained from the relevant consent authority (except where exempt and/or complying development applies).	<ul style="list-style-type: none"> <li>None</li> </ul>	None	Not Triggered
<b>Prescribed Conditions</b>				
A7	The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation.	<ul style="list-style-type: none"> <li>None</li> </ul>	As per the findings of this audit	Compliant
<b>PLANNING SECRETARY AS MODERATOR</b>				
A8	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.	<ul style="list-style-type: none"> <li>Interview with Auditees</li> </ul>	No disputes are known to have arisen between the Applicant and a public authority during the audit period.	Not triggered
<b>LEGAL NOTICES</b>				
A9	Any advice or notice to the consent authority must be served on the Planning Secretary.	<ul style="list-style-type: none"> <li>Interview with Auditees</li> </ul>	No legal advice or notices are known to have been served during the project.	Not triggered

EVIDENCE OF CONSULTATION				
A10	<p>Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <p>(a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for information or approval; and</p> <p>(b) provide details of the consultation undertaken including:</p> <p>(i) the outcome of that consultation, matters resolved and unresolved; and</p> <p>(ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p>	<ul style="list-style-type: none"> <li>The findings from this audit relevant to consultation</li> </ul>	Consultation has occurred as required.	Compliant
A11	<p>All new buildings and structures that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li><i>Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</i></li> <li><i>Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</i></li> </ul>	<ul style="list-style-type: none"> <li>City Plan Construction Certificate No. 210348/1, dated 31/8/2021 (CC1) – Stage 1 Early Works</li> <li>City Plan Construction Certificate No. 210348/2, dated 22/12/2021 (CC2) – Stage 1 (Site 1A &amp; 1B) Basement</li> <li>City Plan Construction Certificate No. 210348/3, dated 20/7/2022 (CC3) - Stage 2 Early Works (bulk excavation, shoring &amp; piling) (Sites 2A, 2B, 2C, 2E &amp; 2D)</li> <li>City Plan Construction Certificate No. 201348/4, dated 25/8/2022 (CC4) – Stage 1 Structure</li> <li>City Plan Construction Certificate No. 201348/5, dated 14/10/2022 (CC5) – Stage 1 Façade &amp; Fitout</li> </ul>	<p>Construction Certificates (CCs) issued for the development include various statements of compliance related to the BCA.</p> <p>Stage 2 (Sites 2A &amp; 2D only) of the development commenced early works in August 2022. The rest of Stage 2 was on hold at the time of IA3. One construction certificate had been issued for Stage 2 Early Works (CC3).</p> <p>Stage 1 of the development was ongoing at the time of this audit IA3. Four construction certificates had been issued for Stage 1 (CC1, CC2, CC4 &amp; CC5).</p> <p><i>NB: It is outside the scope of the Auditor's engagement to ensure the development is BCA compliant. The issue of CCs is the responsibility of the Certifier.</i></p>	Compliant

Operation of Plant and Equipment				
A12	<p>All plant and equipment used on site, or to monitor the performance of the development must be:</p> <p>a) maintained in a proper and efficient condition; and</p> <p>b) operated in a proper and efficient manner.</p>	<ul style="list-style-type: none"> <li>Site inspection, dated 10/10/2022</li> <li>Deicorp Form 10 – Plant Register</li> <li>Earthworx Operator Pre-Start Checklist – Excavator, 26/9/2022</li> </ul>	<p>Excavators and piling rigs were on site (Stage 2) during the audit.</p> <p>A Plant Register listing plant on site was available in the site office.</p> <p>Most plant is supplied and maintained by Earthworx and was mobilised to the Stage 2 site about 8 weeks prior to IA3 (i.e. approximately mid-August 2022).</p> <p>Works on Stage 1 were limited to formwork and concrete pours (FRP) and was mainly out of the ground.</p>	Compliant
Applicability of Guidelines				
A13	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	<ul style="list-style-type: none"> <li>None</li> </ul>	None	Not Triggered
A14	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	<ul style="list-style-type: none"> <li>None</li> </ul>	None	Not Triggered
Monitoring and Environmental Audits				
A15	<p>Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&amp;A Act. This includes conditions in respect of incident notification, reporting and response, noncompliance notification and independent auditing.</p> <p><b>Note:</b> For the purposes of this condition, as set out in the EP&amp;A Act, “monitoring” is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the</p>	<ul style="list-style-type: none"> <li>None</li> </ul>	See conditions related to monitoring in Part D.	Compliant

	<i>development, and an “environmental audit” is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.</i>			
<b>COMPLIANCE</b>				
A16	The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	<ul style="list-style-type: none"> <li>Letter of Award – Formgroup NSW Pty Ltd (formwork), 9/12/2021</li> </ul>	Letter of Award includes reference to scope of works and documents relevant reports and documents. The letter includes reference to the SSD 10425 approval and requirement to comply.	Compliant
<b>Revision of Strategies, Plans and Programs</b>				
A17	<p>Within three months of:</p> <p>a) the submission of a compliance report under this consent;</p> <p>b) the submission of an incident report under this consent;</p> <p>c) the submission of an Independent Audit under this consent;</p> <p>d) the approval of any modification of the conditions of this consent (excluding modifications made under section 4.55(1) of the EP&amp;A Act); or</p> <p>e) the issue of a direction of the Planning Secretary under this consent which requires a review,</p> <p>the strategies, plans and programs required under this consent must be reviewed, and the Department must be notified in writing that a review is being carried out.</p>	<ul style="list-style-type: none"> <li>Interview with Auditees</li> <li>AECOM AQMP, Rev 2, 13/5/2022</li> <li>Acoustic Logic CNVMP, Rev 1, 19/7/2021</li> <li>BRS CEMP, Site 2, 30/5/2022</li> <li>BRS CPTMP, Site 2, 28/5/2022</li> <li>Sky Engineering SWMP/ESCP, Site 2 20/5/2022</li> <li>BRS CWMP, Site 2, 26/5/2022</li> <li>EI Australia Dewatering Management Plan, Site 2, 5/8/2021</li> <li>EI Australia Groundwater Take Assessment, 30/7/2021</li> </ul>	Plans as listed in the evidence column (and in detail in Section 1.5.2 of the IA3 Audit Report) were updated since the last Independent Audit (IA2) and address requirements, including conditions of approval relevant to Stage 2.	Compliant
A18	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the	<ul style="list-style-type: none"> <li>Interview with Auditees</li> </ul>	As per A17	Compliant

	<p>strategies, plans and programs required under this consent must be revised to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.</p> <p><b>Note:</b> This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</p>			
<b>COMPLIANCE REPORTING</b>				
A19	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Requirements outlined in the Compliance Reporting Post Approval Requirements (2020).	<ul style="list-style-type: none"> <li>DPE Compliance Reporting Post Approval Requirements-2020</li> </ul>	<p>It is understood there is no requirement for compliance reporting for the project during Construction (or Pre-Construction) in accordance with DPE's Compliance Reporting Post Approval Requirements (2020).</p>	Not triggered
A20	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed to by the Planning Secretary.			
A21	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary, unless otherwise agreed by the Planning Secretary.			
A22	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.			
<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>				
A23	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	<ul style="list-style-type: none"> <li>DPE Independent Audit Post Approval Requirements, 2020</li> <li>This audit (IA3 SSD 10425, dated 10/10/2022)</li> </ul>	This audit (IA3 SSD 10425, dated 10/10/2022) is being conducted in accordance with the Independent Audit Post Approval Requirements (2020)	Compliant
A24	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	<ul style="list-style-type: none"> <li>DPE Appointment of Experts, SSD 10425, dated 29/07/2021</li> <li>Auditor Declaration of Independence Form,</li> </ul>	DPE Letter approves the appointment (Ms Josephine Heltborg, Principal Environmental Consultant) to prepare the Independent Environmental Audit in accordance with Schedule 2,	Compliant

		SSD 10425, dated 20/07/2021	Condition A24 of SSD 10425 and the IAPARs.	
A25	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least 4 weeks' notice (or timing) to the Applicant of the date upon which the audit must be commenced.	<ul style="list-style-type: none"> <li>None</li> </ul>	None	Not triggered
A26	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under this consent; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available 60 days after submission to the Planning Secretary.	<ul style="list-style-type: none"> <li>This audit (IA3 SSD 10425, dated 10/10/2022)</li> <li>Independent Audit Report IA2 SSD 10425, dated 20/04/2022</li> <li>Submission of IA2 to DPE (<a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a>), dated 1/6/2022</li> <li>Project website (<a href="https://tallawongda.northwestvillage.com.au/">https://tallawongda.northwestvillage.com.au/</a>)</li> </ul>	<p>This audit (IA3 SSD 10425, dated 10/10/2022) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020.</p> <p>The IA2 Audit Report was submitted to DPE on 1/6/2022.</p> <p><b>The IA2 Audit Report was not available on the project website at the time of IA3:</b> <a href="https://tallawongda.northwestvillage.com.au/">https://tallawongda.northwestvillage.com.au/</a></p> <p><b>Recommendation: Upload a copy of the IA3 Audit Report to the project website within 60 days of submission to the Planning Secretary.</b></p>	Non-Compliant
A27	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approvals Requirements (2020) unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> <li>Independent Audit Report IA2 SSD 10425, dated 20/04/2022</li> <li>Submission of IA2 to DPE (<a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a>), dated 1/6/2022</li> </ul>	<p>This audit (IA3 SSD 10425, dated 10/10/2022) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020.</p> <p>The IA2 Audit Report was submitted to DPE on 1/6/2022 and included the Applicants' response to the IA2 audit findings.</p>	Compliant
A28	Notwithstanding the requirements of the Independent Audit Post Approvals Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's	<ul style="list-style-type: none"> <li>None</li> </ul>	None	Not triggered

	satisfaction that independent operational audits have demonstrated operational compliance.			
<b>REMEDIATION – REMEDIAL ACTION PLAN</b>				
A29	The Applicant must remediate the site in accordance with the specifications and requirements detailed in the Remedial Action Plan prepared by EI Australia, dated 16 April 2020 (ref: E24445.E06_Rev1) and relevant guidelines produced or approved under the <i>Contaminated Land Management Act 1997</i> . Remediation works must be undertaken by a suitably qualified and experienced consultant(s).	<ul style="list-style-type: none"> <li>• Remedial Action Plan prepared by EI Australia, dated 16 April 2020 (ref: E24445.E06_Rev1)</li> <li>• EI Australia Engagement Letter, dated 23/07/2021</li> <li>• Interview with Auditees</li> <li>• Site Audit Statement, Site 1, 7 July 2022, Tim Chambers, Phreatic Consulting</li> </ul>	<p>Remediation of Site 1 was complete, and a Site Audit Report (SAR) and Site Audit Statement (SAS) had been issued. Remediation had commenced recently on Site 2 at the time of IA3.</p> <p>Tim Chalmers of Phreatic Consulting is engaged as the NSW EPA Site Auditor, and EI Australia have been managing the remediation works ongoing for Sites 1 and 2.</p> <p>EI Australia Engagement Letter states EI Australia is a suitably qualified contaminated land environmental consultant.</p> <p>Remediation of Site 2 is addressed covered in the overarching Remedial Action Plan (RAP) and Detailed Site Investigation (DSI) for the development.</p> <p>Remediation has involved predominantly the removal and validation of shallow soil impact (asbestos).</p> <p><i>NB: Verification of compliance with the RAP is managed by the EPA Site Auditor and is outside the scope of this audit.</i></p>	Compliant

PLANNING AGREEMENT				
A30	Any relevant obligation required to be performed by the applicant under the Planning Agreement-Village Green Land at Tallawong Station Precinct South executed on 6 May 2021 between Blacktown City Council and Deicorp Projects (Tallawong Station) Pty Ltd, must be completed prior to the issue of an Occupation Certificate.	<ul style="list-style-type: none"> <li>• Planning Agreement – Village Green Land at Tallawong Station Precinct South, Addisons, dated 06/05/2021</li> <li>• Interview with Auditees</li> </ul>	Voluntary Planning Agreement (VPA) signed by Blacktown City Council, dated 06/05/2021 sighted. VPA requirements to be met prior to issue of the OC. <i>NB: Verification of compliance with requirements of the VPA are outside the scope of this audit.</i>	Not triggered
REGISTRATION OF EASEMENTS AND COVENANTS – PUBLIC ACCESS				
A31	Easements under section 88A and/or restrictions or public positive covenants under section 88E of the <i>Conveyancing Act 1919</i> naming Blacktown City Council as the prescribed authority, which can only be revoked, varied or modified with the consent of Blacktown City Council, and which provides for public use and access to parks, plazas and paths that are identified to be privately owned lands with public easements under Concept Development Approval SSD 9063 as modified, must be registered on title prior to occupation or issue of subdivision certificate, whichever is earlier.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> </ul>	Subdivision works including the registration of easements and covenants are understood to relate to Site 2 only. Auditees advised the registration of stormwater easements etc. will be part of future works and was not relevant at the time of IA3.	Not triggered
PART C – PRIOR TO COMMENCEMENT OF WORKS				
REMEDiation – UNEXPECTED FINDS PROTOCOL				
C33	Prior to the commencement of any earthwork or remediation works for the development, the Applicant must submit to the satisfaction of the Certifier an Unexpected Finds Protocol which has been reviewed and endorsed by an EPA accredited site auditor. The protocol must outline contingency measures and the procedures to be followed in the event unexpected finds of contaminated material are encountered during works.	<ul style="list-style-type: none"> <li>• Remedial Action Plan prepared by EI Australia, dated 16 April 2020 (ref: E24445.E06_Rev1)</li> <li>• City Plan Construction Certificate No. 210348/1, dated 31/8/2021 (CC1)</li> <li>• Interview with Auditees</li> <li>• Evidence of submission of the UFP to the Certifier, dated 6/10/2021</li> </ul>	The Unexpected Finds Protocol (UFP) is included in Appendix C of the RAP and outlines contingency measures and the procedures to be followed in the event unexpected finds of contaminated material are encountered during works. Evidence of submission to the Certifier by Deicorp sighted. <i>The RAP (with UFP attached) was not listed on CC1. Evidence of 'satisfaction of the Certifier' was requested during</i>	Compliant

		<ul style="list-style-type: none"> <li>• Phreatic Consulting Letter RE: Interim Advice 1 Review of UFP, 6/10/2021</li> <li>• Email from City Plan RE Condition C33, 13/10/2021</li> </ul>	<p><i>the IA1 and provided in an email from City Plan, dated 13/10/2021.</i></p> <p><i>Evidence of UFP review and endorsement by the EPA Site Auditor was provided, dated 6/10/2021.</i></p> <p><i>Both of the above requirements were satisfied after the commencement of earthworks and remediation works, and identified as non-compliant with C33 in IA1.</i></p> <p><i>The NC was addressed and closed-out and this condition is now deemed Compliant for the purpose of IA2 and IA3.</i></p>	
<b>GROUNDWATER REQUIREMENTS AND MANAGEMENT</b>				
C39	<p>Prior to commencement of works the Applicant is to undertake the following to the satisfaction of DPIE Water and the Natural Resources Access Regulator (NRAR):</p> <p>(a) demonstrate adequate groundwater entitlements can be obtained for the project's operational water take</p> <p>(b) ensure sufficient water entitlement is held in a water access licence/s (WAL) to account for the maximum predicted take for each water source prior to take occurring</p> <p>(c) develop a Ground Water Management Plan for the construction phase</p> <p>(d) develop a dewatering reporting schedule covering duration of construction</p> <p>(e) develop a proposed operational phase (after building completion) monitoring and reporting schedule</p>	<ul style="list-style-type: none"> <li>• EI Australia Dewatering Management Plan, Tallawong Site 2, Rev1, dated 5/8/2021</li> <li>• EI Australia Groundwater Take Assessment, dated 30/7/2021</li> <li>• EI Australia Email to NRAR, dated 28/9/2021</li> <li>• EIA Australia Letter to Deicorp, Ref: E24445.E09.004_Rev00, dated 5/8/2021</li> <li>• NRAR Letter to EI Australia, dated 24/9/2021</li> <li>• Letter from DPIE to Paula Bizimis, Ref:</li> </ul>	<p>EI Australia Dewatering Management Plan sighted. EI Australia letter, 5/8/2021 addresses Condition C39 in response to letters from NRAR &amp; DPE dated 3/8/2020 &amp; 5/3/2021. These letters set out requirements in relation to dewatering, groundwater management, licensing and reporting. EI Australia responded to these letters in correspondence dated 5/8/2021.</p> <p>(a) The Groundwater Take Assessment provides an estimate of groundwater take volumes that require pumping during construction and operation; an estimate of groundwater drawdown and associated ground settlements. Groundwater take volumes have been estimated as <b>0.48ML/year for Site 1 and 0.86ML/year for Site 2</b>. EI Australia has indicated (Interview,</p>	Compliant

		<p>OUT20/7856, dated 3/8/2020</p> <ul style="list-style-type: none"> <li>Letter from DPIE to Paula Bizimis, Ref: OUT20/408, dated 5/3/2021</li> <li>EIA Groundwater Monitoring Report No.1, E24445.G11.GW01, 19/10/2022</li> <li>EI (2020c) Additional Groundwater Investigation, Tallawong Station South, Rouse Hill NSW. Project No. E24445.E17_Rev0, dated 1 October 2020</li> <li>EI Australia Letter RE: Environmental Site Status, Tallawong, dated 8/11/2021</li> <li>EI Letter RE: Response on the Dewatering at Site 1 Tallawong Station Precinct South, Rouse Hill NSW, dated 21/4/2022</li> <li>EI Australia Dewatering Analytical Results, E24445.E18.3_DW3, E18.4_DW4, E18.5_DW5, E18.6_DW6, E18.7_DW7, E18.8_DW8, E18.9_DW9, E18.10_DW10, E18.11_DW11, E18.12_DW12,</li> </ul>	<p>dated 6/5/2022 &amp; Letter dated 21/4/22) that actual groundwater seepage is very low, though has not been quantified. Groundwater had not been encountered on Site 2 at the time of this IA3.</p> <p>(b) As per NRAR Letter to EI Australia, dated 24/9/2021, there is no requirement to obtain groundwater entitlements or a Water Access Licence during construction. This is supported by the EIA Groundwater Take Assessment, dated 30/7/2021. The Dewatering Management Plan (DMP) (EIA, 8/2021) estimates the total take volume for dewatering of Site 2 as <b>0.35ML over 150 days during construction</b> and <b>0.86ML over 24 months during operation</b>.</p> <p>(c) The EI Australia DMP, Tallawong Site 1, Rev0, dated 26/3/2021 is understood to meet the requirement for a Groundwater Management Plan as per C39, as confirmed by NRAR via email to EI Australia, dated 8/10/2021 and EI Australia Letter, 5/8/2021. An updated Dewatering Management Plan was prepared by EIA, dated 5/8/2021. Section 4.3 of the DMP recommends monitoring of groundwater drawdown to validate the accuracy of the seepage model, and the adjustment of pumping rates as required.</p>	
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		<p>E18.13_DW13, E18.14_DW14</p>	<p>EIA Groundwater Monitoring Report No.1 provides a summary of groundwater level monitoring from 19/11/21 to 10/10/22 for Site 1. <b>The Groundwater Monitoring Report does not include analysis of results, or a discussion of graphs which indicate a possible overall trend of decreasing groundwater levels during construction. Validation of the accuracy of the seepage model has not been confirmed.</b></p> <p><b><i>Recommendation: Provide an analysis of groundwater level data, including potential effects of groundwater drawdown, if relevant, and validation of the accuracy of the seepage model.</i></b></p> <p>The DMP estimates groundwater seepage at 2.35m<sup>3</sup>/day during construction. EIA predicts a tanked basement would not be required during operation, instead a drained basement would be possible.</p> <p>(d) Reporting of groundwater quality results is addressed in Section 5.3 &amp; 5.3.3 of the Dewatering Management Plan and includes the requirement for a summary report to be prepared upon completion of the initial assessment, Interim Monitoring Reports, and a Dewatering Completion Report.</p> <p><b><i>(e) As outlined in EI's Letter, 5/8/2021, a DMP for the operational phase will be developed following</i></b></p>	
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			<p><b><i>construction of the basement. This will take into account water quality and volumes identified during basement construction. It will specifically outline the monitoring and reporting schedule.</i></b></p> <p>NRAR Letter to EI Australia, dated 24/9/2021 states a Water Access Licence (WAL) is not required under Schedule 4 Clause 7 of the <i>Water Management (General) Regulations 2018</i>, as the projects construction water take is less than 3ML per year. EI Australia operational annual estimate in the Water Take Assessment is <b>0.86ML</b>.</p> <p>NRAR's letter also refers to their review of the Dewatering Management Plan, and confirms they have no further comments. EI Australia's email, dated 28/9/2021 states <i>"It is my understanding that this letter serves as the approval of SSD10425 conditions for dewatering C39 and D24 as provided in EI's letter dated 5 August 2021. The groundwater will be managed as per the recommendations of the Dewatering Management Plan (DMP) prepared by EI (dated 3 August 2021) and attached as Attachment A in EI's letter dated 5 August 2021"</i>.</p> <p>Considering the above, NRAR's Letter to EI Australia, dated 24/9/2021 is considered approval of the Dewatering Management Plan.</p>	
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			<i>*The assessment of groundwater contamination and remediation has been assessed by EI Australia and Phreatic Consulting separately and has not been verified for compliance here as it does not relate directly to the approval condition.</i>	
<b>PART D – DURING CONSTRUCTION</b>				
<b>APPROVED PLANS TO BE ON-SITE</b>				
D1	A copy of the approved and certified plans, specifications and documents incorporating conditions of approval and certification must be kept on the Site at all times and must be readily available for inspection by any officer of the Department, Council or the Certifier.	<ul style="list-style-type: none"> <li>Site inspection 10/10/2022</li> </ul>	Copies of approved plans were available for review on site in the project office.	Compliant
<b>SITE NOTICE</b>				
D2	<p>A site notice(s) shall be prominently displayed at the boundaries of the site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifier and Structural Engineer. The notice(s) is to satisfy all but not be limited to, the following requirements:</p> <p>(a) minimum dimensions of the notice are to measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size;</p> <p>(b) the notice is to be durable and weatherproof and is to be displayed throughout the works period</p> <p>(c) the approved hours of work, the name of the site/project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/noise complaint are to be displayed on the site notice; and</p> <p>(d) the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the site is not permitted.</p>	<ul style="list-style-type: none"> <li>Site inspection 10/10/2022</li> </ul>	<p>Site Notices were displayed at the access points to Site 1 and Site 2.</p> <p>(a) Site Notices were larger than minimum size</p> <p>(b) Site Notices were made from weatherproof material</p> <p>(c) The following details were included on the Site Noticed: Approved work hours, name of Project Manager, name, address &amp; mobile number of Builder (managing company)</p> <p>(d) Notices were at eye level on hoardings at both site entrances. Additional signage 'Construction Site, Unauthorised Persons Keep Out' also displayed.</p>	Compliant

Hours of Construction				
D3	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 6pm, Mondays to Fridays inclusive; and (b) between 8am and 1pm, Saturdays.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• CEMP &amp; CNVMP</li> </ul>	Deicorp advised works are only conducted during standard working hours, as documented in the CEMP & CNVMP, and displayed on the Site Notice.  No complaints about out of hours work (OOHW) are known to have been received in relation to the project.	Compliant
D4	No work may be carried out on Sundays or public holidays.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• CEMP &amp; CNVMP</li> </ul>	Deicorp advised no works have occurred on Sundays or public holidays. No OOHW have reportedly been required or undertaken.	Compliant
D5	Activities may be undertaken outside of these hours if required: (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• CEMP &amp; CNVMP</li> </ul>	No emergencies have reportedly occurred during the project, that may require OOHW.	Not Triggered
D6	Notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> </ul>	No OOHW are known to have been undertaken.	Not Triggered
D7	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: (a) 9am to 12pm, Monday to Friday; (b) 2pm to 5pm Monday to Friday; and (c) 9am to 12pm, Saturday.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• CEMP &amp; CNVMP</li> <li>• Site inspection 10/10/2022</li> </ul>	The requirements of D7 are documented in the CEMP & CNVMP. The CNVMP has been updated to incorporate Stage 2, dated May 2022.  There were no highly intensive works being undertaken at the time of the audit, e.g. rock breaking or saw cutting. Piling and excavation was underway on Site 2 and form reo pour (FRP) was underway on Site 1 but was not particularly noisy.  The Deicorp Construction Manager indicated he was aware of the respite periods and requirements in D7 around the timing of noise intensive	Compliant

			<p>works. All works are within or close to the site boundary (e.g. concrete pumping from Conferta Ave to Site 1 site). <b>Deicorp may need to consider the implementation of additional noise mitigation measures once works extend above the site hoarding.</b></p> <p>No complaints are known to have been made in relation to noise for the project to date. The nearest receivers to the excavation works are located to the south of Site 2 in Zone R2 on Schofields Road.</p> <p>Deicorp advised no rock hammering had been conducted to date on Site 2; with basement excavation not yet reaching bedrock.</p>	
<b>INCIDENT NOTIFICATION, REPORTING AND RESPONSE</b>				
D8	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• CEMP &amp; CNVMP</li> </ul>	No environmental incidents are known to have occurred during the project. Procedures for dealing with an environmental incident are included in the CEMP.	Not Triggered
D9	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 1.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> </ul>	As per D8	Not Triggered
<b>NON-COMPLIANCE NOTIFICATION</b>				
D10	The Department must be notified in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Department in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> within seven days after they identify any non-compliance.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• CEMP &amp; CNVMP</li> </ul>	No non-compliances are known to have occurred during the project (other than those raised during Independent Audits, which have been notified to DPE with submission of each Audit Report).	Not Triggered

			Procedures for dealing with an environmental incident are documented in the CEMP.	
D11	The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the noncompliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> </ul>	As per D10	Not Triggered
D12	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	<ul style="list-style-type: none"> <li>• NA</li> </ul>	Noted	Not Triggered
<b>SAFEWORK REQUIREMENTS</b>				
D13	To protect the safety of work personnel and the public, the work site must be adequately secured to prevent access by unauthorised personnel, and work must be conducted at all times in accordance with relevant SafeWork requirements.	<ul style="list-style-type: none"> <li>• Site Management Plan</li> <li>• Site inspection 10/10/2022</li> <li>• Interview with Auditees</li> </ul>	The Site Management Plan shows the extent of hoarding around the whole site, gates and padlocks. Security arrangements were confirmed with the Site Manager who confirmed CCTV has been installed at both site, with cameras monitored from the site office. CCTV is also in place for public car parking to the west of the site.	Compliant
<b>IMPLEMENTATION OF MANAGEMENT PLANS</b>				
D14	The Applicant must ensure the requirements of the Construction Environmental Management Plan, Construction Pedestrian Traffic Management Plan, Construction Noise and Vibration Management Sub-Plan, Air Quality Management Plan and Construction Waste Management Plan required by this consent are implemented during construction.	N/A	As per later section of the audit on CEMP & Sub Plan compliance.	Compliant
<b>CONSTRUCTION NOISE LIMITS</b>				
D15	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved CNVMP.	<ul style="list-style-type: none"> <li>• CNVMP</li> <li>• Site inspection 10/10/2022</li> </ul>	The CNVMP sets out mitigation measures to be implemented to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). The implementation of selected CNVMP mitigation measures has been	Compliant

			assessed in a later section of this audit.	
D16	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the subject site or surrounding residential precincts outside of the construction hours of work outlined under this consent.	<ul style="list-style-type: none"> <li>• CNVMP</li> <li>• Interview with Auditees</li> </ul>	<p>There has been no known instance of deliveries, including concrete trucks, arriving out of hours during the project.</p> <p>The requirement to meet D16 has been included in the CNVMP.</p>	Compliant
D17	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use audible movement alarms of a type that would minimise noise impacts on surrounding noise sensitive receivers.	<ul style="list-style-type: none"> <li>• Australian Piling Plant Pre-Start form</li> </ul>	<p>Plant Pre-Start checks include the verification of reversing travel alarms. The Site Manager indicated reversing quackers were a requirement for all plant and equipment where relevant.</p>	Compliant
D18	The Applicant must ensure that any work generating high noise impact (i.e. work exceeding a NML of LAeq 75dBA) as measured at the sensitive receiver must only be undertaken in continuous blocks of no more than 3 hours, with at least a 1 hour respite between each block of work generating high noise impact, where the location of the work is likely to impact the same receivers. For the purposes of this condition 'continuous' includes any period during which there is less than one hour respite between ceasing and recommencing any of the work the subject of this condition.	<ul style="list-style-type: none"> <li>• Acoustic Logic CNVMP</li> <li>• Interview with Auditees</li> </ul>	<p>The highest noise impact predicted for Site 2 in the CNVMP is jack hammering, predicted to reach levels of 66-80dB(A) at the Switching Station and 66-77dB(A) at Residential Zone R2 (south of Site 2 on Schofields Road), and rock hammering, predicted at 66-77dB(A) at Residential Zone R2.</p> <p>The CNVMP does not identify any other activities that would exceed an NML of LAeq 75dBA.</p> <p>No noisy activities were being conducted at the time of the site inspection (which commenced at 9am, 10/10/22).</p> <p>The Deicorp Construction Manager indicated he was aware of the respite periods and requirements in D7 around the timing of noise intensive works.</p>	Compliant

			No complaints are known to have been made in relation to noise for the project to date.	
D19	Any noise generated during construction of the development must not be offensive noise within the meaning of the <i>Protection of the Environment Operations Act 1997</i> or exceed approved noise limits for the site.	<ul style="list-style-type: none"> <li>• Acoustic Logic CNVMP</li> <li>• Interview with Auditees</li> </ul>	No offensive noise is known to have occurred on site to date, and no noise complaints are known to have been made. See also D18.	Compliant
<b>VIBRATION CRITERIA</b>				
D20	Vibration caused by construction at any residence or structure outside the Site must be limited to: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); (b) for human exposure to vibration, the evaluation criteria set out in the Environmental Noise Management Assessing Vibration: A Technical Guideline (Department of Environment and Conservation, 2006) (as may be updated or replaced from time to time).	<ul style="list-style-type: none"> <li>• Acoustic Logic CNVMP</li> <li>• Interview with Auditees</li> <li>• Site Inspection, 10/10/2022</li> <li>• Acoustic Logic Monthly Vibration Monitoring Reports 2-12, dated - 2/11/2021-11/4/2022</li> <li>• Email from Acoustic Logic, dated 3/05/2022</li> </ul>	According to the CNVMP, the requirement for vibration monitoring is triggered during rock hammering. Vibration monitoring was conducted by Acoustic Logic in accordance with the document entitled ' <i>Monitoring Plan for Sydney Water</i> ' prepared by El Australia (ref: E24445.G10, dated 17/09/2021) during demolition and excavation for the protection of Sydney Water assets on Site 1.  The CNVMP was updated in May 2022 for Site 2 and requires vibration monitoring during rock hammering. Auditees stated rock hammering, or other vibration intensive activities had not been undertaken on Site 2 at the time of IA3. Refer vibration monitoring requirements from the CNVMP. See mitigation measures later in this audit.	Compliant
D21	Vibratory compactors must not be used closer than 30 metres from residential or heritage buildings unless vibration monitoring confirms compliance with the vibration criteria specified above. These limits apply unless otherwise outlined in the project specific CNVMP required by this consent.	<ul style="list-style-type: none"> <li>• Acoustic Logic CNVMP</li> <li>• Interview with Auditees</li> </ul>	Vibratory compactors are not known to have been used on the site to date.	Not triggered

AIR QUALITY				
D22	<p>The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent. During construction, the Applicant must ensure that:</p> <p>(a) exposed surfaces and stockpiles are suppressed by regular watering;</p> <p>(b) all trucks entering or leaving the site with loads have their loads covered;</p> <p>(c) trucks associated with the development do not track dirt onto the public road network;</p> <p>(d) public roads used by these trucks are kept clean; and</p> <p>(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</p>	<ul style="list-style-type: none"> <li>• AQMP</li> <li>• Site Inspection, 10/10/2022</li> <li>• Interview with Auditees</li> </ul>	<p>(a) Dust was not an issue at the time of inspection on 10/10/22 due to recent heavy rainfall.</p> <p>(b) There was no spoil load-out at the time of inspection.</p> <p>(c) There was minimal evidence of tracking onto Conferta Ave from Site 2. Rumble grids were in place at both Site 2 accesses and were well maintained.</p> <p>(d) Roadways were clean on Conferta Ave at both site access points. Deicorp advised a street sweeper was engaged as required.</p> <p>(e) Dust issues have reportedly been minimal during the audit period due to extensive rain events experienced.</p>	Compliant
Erosion and Sediment Control				
D23	<p>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 &amp; Construction (4th edition, Landcom, 2004) commonly referred to as the 'Blue Book'.</p>	<ul style="list-style-type: none"> <li>• Soil and Water Management Plan, CEMP Appendix C</li> <li>• Site Inspection, 10/10/2022</li> <li>• Interview with Auditees</li> </ul>	<p>On Site 2, basement excavations had commenced for three of the 11 towers approved for construction. The site slopes from west to east along the southern site boundary on Schofields Road. Existing stormwater pits inside the site were capped off to prevent water ingress during construction (as required by Council). <b>A sediment fence was in place along the low point of the site, though should be cleaned out and replaced in sections where damage has occurred.</b></p> <p>Water from the basement excavations was pumped to a sediment settling tank, and then to a swale which</p>	Non-Compliant

			<p>diverts the water to stormwater. The south-eastern corner of the site remained covered with thick grass, which would be expected to act as a natural filter.</p> <p><b>There were no ERSED controls in place along the swale, which was created with bare earth, potentially increasing sediment load prior to discharge to the stormwater system. Drainage rock had been applied by a previous contractor around the stormwater inlet outside the site on the corner of Schofields and Cudegong Road.</b></p> <p><b><i>Recommendation: Review and implement the Soil and Water Management Plan to reduce the risk of sediment entering the stormwater system.</i></b></p> <p>Due to the excavation of the entire site below ground level on Site 1, the risk of sediment runoff was very low, with most rainwater expected to be captured and retained on site. Localised ERSED controls were in place along Conferta Ave including coir logs and geofabric drain protection.</p>	
<b>DISPOSAL OF SEEPAGE AND STORMWATER</b>				
D24	Any seepage or rainwater collected on-site during construction or groundwater must not be pumped to the street stormwater system unless separate prior approval is given in writing by the EPA in accordance with the <i>Protection of the Environment Operations Act 1997</i> .	<ul style="list-style-type: none"> <li>• Dewatering Management Plan</li> <li>• Site Inspection, 10/10/2022</li> <li>• Interview with Auditees</li> </ul>	<p>The discharge of water has been addressed in the Dewatering Management Plan, approved by NRAR.</p> <p>Email from NRAR, dated 8/10/2021 states Condition D24 has been met as outlined in their letter, dated</p>	Compliant

		<ul style="list-style-type: none"> <li>• NRAR Letter to EI Australia, dated 24/9/2021</li> <li>• Email from NRAR, dated 8/10/2021</li> </ul>	<p>24/9/2021. (It is noted that NRAR's letter, dated 24/9/2021 does not refer to Condition D24). This condition has been assessed as compliant based on NRAR's letter, dated 8/10/2021 confirming compliance with D24.</p> <p>EI Australia has been engaged by Deicorp to manage the discharge of seepage and rainwater from the site (dewatering). Refer to commentary for D25 and D26.</p>	
D25	Adequate provisions must be made to collect and discharge site stormwater to council stormwater drainage during construction of the development. Prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	<ul style="list-style-type: none"> <li>• Email from Blacktown Council, RE: Stormwater Discharge, dated 24/8/2021</li> <li>• Email submission of Dewatering Management Plan to Council, 24/8/2021</li> <li>• Site Inspection, 10/10/2022</li> <li>• Interview with Auditees</li> <li>• E24445.E09.012_Rev0 - Dewatering Summary Letter, 9/11/2022</li> <li>• EI Letter RE: Response on the Dewatering at Site 1 Tallawong Station Precinct South, Rouse Hill NSW, dated 21/4/2022</li> <li>• Interview with EI Australia, dated 25/10/2022</li> </ul>	<p>The Dewatering Management Plan was provided to Council for review, dated 24/8/2021. Email from Deicorp also requests "In relation to DA Condition D26 of SSD 10425, Deicorp has been seeking council approval for the discharge of ground water into the council drainage system since 27th July 2021".</p> <p>Council email, dated 24/8/2021 states any discharge would be at Deicorp's own risk. Council states if decision is made to pump treated water to the stormwater system, "it is to comply with the "blue book" - Managing urban stormwater: soils and construction, as well as demonstrating the discharged water complies with ANZECC water quality guidelines then the discharge will not be challenged by Council on the basis that the discharge will have 'no environmental impact'".</p> <p>At the time of IA3, water from Site 1 was being collected in a settling tank located in the Conferta Ave work</p>	<b>Non-Compliant</b>

			<p>zone. Compliance with ANZG (2018) discharge criteria is assessed; EI Australia has been engaged since the last Independent Audit (IA2) to manage the process.</p> <p>EI Australia was interviewed on 25/10/2022 and provided an explanation of the surface water monitoring and discharge process.</p> <p>A summary of water quality monitoring data since IA2 was later provided by EIA (dated 9/11/2022) from February 2022, which included results from 16 water sampling events. EIA summarised that intermittent dewatering was required due to heavy rainfall, rather than from groundwater seepage, which was confirmed to be minor. Rainfall was ponded in an isolated detention pit in a low point of the excavation and pumped into a sediment settling tank, prior to being directed to the discharge point located on Conferta Ave to the south of the site. Based on information provided to EIA by Deicorp, the accumulated volume of rainwater dewatered was 2.44ML.</p> <p><b>NB: It is noted that EIA has been engaged by Deicorp to manage the dewatering process. The decision-making process around whether the water is a suitable quality to discharge is the responsibility of Deicorp and EIA and has not been further investigated during this audit.</b></p>	
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			<p><b>At the time of IA3, there was no evidence of water quality sampling being conducted during the discharge of water from Site 2.</b></p> <p><b><u>Recommendation:</u> Implement the Dewatering Management Plan for Site 2 to ensure compliance with Condition D25.</b></p>	
D26	<p>A separate written approval from Council is required to be obtained in relation to any proposed discharge of groundwater into Council’s drainage system external to the site, in accordance with the requirements of section 138 of the <i>Roads Act 1993</i>.</p>	<ul style="list-style-type: none"> <li>• EI Letter RE: Response on the Dewatering at Site 1 Tallawong Station Precinct South, Rouse Hill NSW, dated 21/4/2022</li> <li>• Email from Blacktown Council, RE: Stormwater Discharge, dated 24/8/2021</li> <li>• Email submission of Dewatering Management Plan to Council, 24/8/2021</li> </ul>	<p>As per EI Letter, dated 21/4/2022: <i>“Based on information provided by the client and multiple EI site inspections during excavation, groundwater dewatering has not been required during excavation and construction of the basement. Seepage of groundwater through the bedding planes of the residual clay and shale into the basement has been minor. The clay and shale material within the basement has been observed to be dry”.</i></p> <p>The Dewatering Management Plan was provided to Council for review, dated 24/8/2021. Email from Deicorp also requests <i>“In relation to DA Condition D26 of SSD 10425, Deicorp has been seeking council approval for the discharge of ground water into the council drainage system since 27th July 2021”.</i></p> <p>Council email, dated 24/8/2021 states any discharge would be at Deicorp’s own risk. Council states if decision is made to pump treated water to the stormwater system, <i>“it is to comply with the “blue book” - Managing</i></p>	Compliant

			<i>urban stormwater: soils and construction, as well as demonstrating the discharged water complies with ANZECC water quality guidelines then the discharge will not be challenged by Council on the basis that the discharge will have 'no environmental impact'.</i>	
<b>REMEDICATION – ASBESTOS</b>				
D27	<p>The Applicant must ensure that any asbestos encountered is monitored, handled, transported and disposed of by appropriately qualified and licensed contractors in accordance with the requirements of SafeWork NSW and relevant guidelines, including:</p> <p>(a) Work Health and Safety Regulation 2017;            (b) SafeWork NSW Code of Practice – How to Manage and Control Asbestos in the Workplace September 2016;            (c) SafeWork NSW Code of Practice – How to Safely Remove Asbestos September 2016; and            (d) <i>Protection of the Environment Operations (Waste) Regulation 2014.</i></p>	<ul style="list-style-type: none"> <li>• EI Australia RAP, dated 16/4/2020</li> <li>• EI Australia Waste Classification Certificates:               <ul style="list-style-type: none"> <li>• E24445.E05.2.001 to E05.2.009</li> </ul> </li> <li>• EI Asbestos Clearance Certificate, REF E24445.E11.001_Rev0, dated 28/9/2021</li> <li>• EI Australia correspondence RE: Tallawong Site 2 Waste certificates, dated 19/8/22-12/10/22</li> <li>• Phreatic Consulting, Contaminated Site Audit Report, Tallawong Station South Precinct – Stage 1, 21/6/2022</li> <li>• NSW EPA Site Audit Statement, Stage 1, 7/7/2022</li> </ul>	<p>EI Australia has been engaged by Deicorp to manage the site remediation and associated waste management requirements. Compliance with Condition D27 for Site 1 was addressed in IA2, and a Contaminated Site Audit Report was prepared by the Site Auditor, dated 21/6/2022 and Site Audit Statement, Stage 1, 7/7/2022. The Auditor's review of the waste classification reports for Site 1 has indicated adequate compliance with the NSW EPA (2014) Waste Classification Guidelines and the ENM Exemption. For Site 1, the EPA Auditor concluded <i>"The volumes of waste disposed are generally consistent with the waste classification estimates although additional asbestos waste and VENM appear to have been taken off site. The Auditor is satisfied that this is due to over-excavation in the remedial works (asbestos waste) and additional excavation of natural materials (VENM) and that all material was disposed from site under an</i></p>	Compliant

			<p><i>appropriate waste classification certification”.</i></p> <p>Earthworx has also been engaged as the asbestos removalist and transporter for Site 2.</p> <p>For Site 2, waste classification certificates E24445.E05.2.001 to E05.2.009 have been prepared for the following:</p> <ul style="list-style-type: none"> <li>• Stockpiled fill sourced from the excavation of the former dam in the central portion classified as GSW;</li> <li>• In-situ fill in the western portion of the basement excavation at Stage 3 (Site 2A) classified as ENM;</li> <li>• Stockpiled fill at Stage 4 (Site 2D) classified as ENM;</li> <li>• Natural material (i.e. VENM) in the western portion of Stage 3 (Site 2A); and</li> <li>• Stockpiled fill sourced from remedial excavation of asbestos hotspots (TP2A12 from Site 2A and TP50 from Site 2BCE) classified as GSW-Asbestos.</li> </ul> <p>A brief summary for remediation works at IA3 was provided as follows:</p> <p><b>Site 1:</b> Remediation and validation works completed. Site Audit Statement for Site 1 is attached in this email.</p> <p><b>Site 2:</b></p>	
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			<p>Remediation and validation works in progress. The remaining area to be classified is:</p> <ul style="list-style-type: none"> <li>• One GSW hotspot: TP2A13 at Site 2A;</li> <li>• The remaining fill material in the eastern half of Stage 3 (Site 2A);</li> <li>• Natural material (i.e. VENM) in the eastern half of Stage 3 (Site 2A);</li> <li>• Fill material from Stage 4 (Site 2D);</li> <li>• Natural material (i.e. VENM) in Stage 4 (Site 2D); and</li> <li>• Fill and natural material in Stage 5 (Site 2BCE).</li> </ul> <p>The above waste classification process will be subject to assessment by the EPA Auditor, and included in corresponding Interim Advice, Clearance Certificates, Site Audit Report and Site Audit Statement etc.</p> <p><i>*The remediation of groundwater has been assessed separately by El Australia and Phreatic Consulting</i></p>	
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CONSTRUCTION TRAFFIC				
D28	All construction vehicles are to be contained wholly within the Site, except if located in an approved on-street work zone, and vehicles must enter the Site before stopping.	<ul style="list-style-type: none"> <li>• Site Inspection, 10/10/2022</li> <li>• Interview with Auditees</li> <li>• Emails from Blacktown City Council, dated 8/9/2022 &amp; 17/10/2022</li> </ul>	<p>During the site inspection trucks were parked up along the hoarding outside the site on Conferta Avenue to pump concrete and for other materials deliveries.</p> <p>The former nature strip (in use as a loading/work zone) had been concreted.</p> <p>An email from Blacktown City Council, dated 8/9/2022 was provided as evidence of approval for use of the area as a Work Zone until <b>26 August 2023</b> subject to terms and conditions and payment.</p> <p>Acknowledgement of receipt of payment was included in a further email, dated 17/10/2022.</p> <p>It is not clear whether the work zone was in use for a period where conditions were not met but this is considered a matter for Council to verify.</p> <p><b><i>Observation: Ensure a current Work Zone approval is in place at all times where required.</i></b></p>	Compliant
ROAD OCCUPANCY LICENCE				
D29	A Road Occupancy Licence must be obtained from the relevant transport authority for any works that impact on traffic flows during construction activities.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> </ul>	<p>At the time of site inspection one lane was closed on Conferta Avenue to allow room for trucks to load spoil and pump concrete (see description for D28). Traffic control was in place.</p> <p>Deicorp advised the Work Zone approval (refer D28) also covers the lane closure, though associated Plans</p>	Compliant

			attached to the Work Zone approval were not made available for review. <b>Observation: Ensure a current approval is in place for lane closures at all times where required.</b>	
<b>NO OBSTRUCTION OF PUBLIC WAY</b>				
D30	The public way must not be obstructed by any materials, vehicles, refuse skips or the like, under any circumstances. Non-compliance with this requirement will result in the issue of a notice by the Planning Secretary to stop all work on site.	<ul style="list-style-type: none"> <li>Site Inspection, 10/10/2022</li> </ul>	As per D28, the 'public way' along the northern side of Conferta Avenue was obstructed at the time of site audit by trucks loading out spoil and concrete deliveries. Approvals for the use of this area were provided. Refer to Observations for Conditions D28 and D29.	Compliant
<b>CONTACT TELEPHONE NUMBER</b>				
D31	The Applicant shall ensure that the 24-hour contact telephone number is continually attended by a person with authority over the works for the duration of the development.	<ul style="list-style-type: none"> <li>Site Inspection, 10/10/2022</li> <li>Interview with Auditees</li> </ul>	24-hour contact number is on Site Notice. See D2.	Compliant
<b>Covering of Loads</b>				
D32	All vehicles involved in the excavation and / or demolition process and departing from the property with materials, spoil or loose matter must have their loads fully covered before entering the public roadway.	<ul style="list-style-type: none"> <li>Site Inspection, 10/10/2022</li> <li>Interview with Auditees</li> </ul>	Requirement to cover loads is documented in the CEMP. There was no spoil load-out at the time of the audit.	Compliant
<b>Vehicle Cleansing</b>				
D33	Prior to the commencement of work, suitable measures are to be implemented to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the Site. It is an offence to allow, permit or cause materials to pollute or be placed in a position from which they may pollute waters.	<ul style="list-style-type: none"> <li>Site Inspection, 10/10/2022</li> <li>Interview with Auditees</li> </ul>	Rumble grids were in place at both heavy vehicle site accesses for Stage 2. Site accesses were located at the western and eastern ends of the site on Conferta Avenue. A street sweeper is available for use as required.	Compliant

			Manual sweeping of the road was observed at the time of the inspection. Tracking was minimal and being controlled.	
<b>STORMWATER REQUIREMENTS</b>				
D34	The Applicant shall ensure that the following specifications are met and are not reduced in size or replaced with an alternate manufacturer's product: (a) the twenty-five 690 Storm filter cartridges for the Storm filter chamber supplied by Ocean Protect (b) the Jellyfish filters three numbers of JF 2250-7-2 and one JF 3250-16-3 supplied by Ocean Protect (c) the Gross Pollutant Traps- two numbers HumeGard HG15 and three numbers of HumeGard HG12A supplied by Humes.	<ul style="list-style-type: none"> <li>Robert Bird Group Letter to Deicorp RE: SSD Compliance Certificate 002, dated 14/7/2021</li> </ul>	Letter from Robert Bird Group (RBG) addresses Conditions C25, D34 & D36 and confirms compliance. RBG note that Condition D34 (b) is not related to Stage 1 and that Condition D34 (c) is only part related to Stage1. To clarify, a single Humegard HG15 Gross Pollutant Trap is to be provided on the Stage 1 site in accordance with the SSDA submitted design. Auditees indicated D34 has not been triggered for Site 1, and is being finalised in the design for Site 2.	Not triggered
D35	A plumber licensed with NSW Fair Trading is to undertake flow testing of the non-potable water reuse system to certify that all the toilets are capable of being supplied by rainwater and that there is no cross mixing or cross contamination with the potable water supply.	<ul style="list-style-type: none"> <li>Interview with Auditees</li> </ul>	OSD requirements to be triggered later in the project	Not triggered
D36	Provide certification prior to the placement the bioretention filter media ex-bin has: (a) a minimum hydraulic conductivity as defined by ASTM F1815-11 of 250 mm/hr (actual, not predicted) (b) a maximum hydraulic conductivity as defined by ASTM F1815-11 of 700 mm/hr (actual, not predicted) (c) a pH between 5.5 and 7 (d) an Orthophosphate content < 20 mg/kg (e) a Total Nitrogen content between 800 and 1000 mg/kg (f) is not hydrophobic.	<ul style="list-style-type: none"> <li>Robert Bird Group Letter to Deicorp RE: SSD Compliance Certificate 002, dated 14/7/2021</li> </ul>	Letter from Robert Bird Group (RBG) addresses Conditions C25, D34 & D36 and confirms compliance. NB: No additional evidence was presented as part of this IA3 to support compliance with Condition D36. The Auditor is relying on the verification of compliance by the Certifier in this instance. Auditees indicated D36 has not been triggered for Site 1, and is being finalised in the design for Site 2.	Not triggered
<b>SYDNEY METRO CORRIDOR PROTECTION</b>				

D37	Unless advised by Sydney Metro in writing, all excavation, shoring and piling works within 25m of the rail corridor are to be supervised by a geotechnical engineer experienced with such excavation projects and who holds current professional indemnity insurance.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• Site Survey Plans</li> </ul>	Deicorp advised works are not within 25m of the rail corridor, reference provided to Site Survey Plans (25.5m to site boundary).	Not triggered
D38	The Applicant must ensure that at all times they have a representative (which has been notified to Sydney Metro in writing), who: (a) oversees the carrying out of the Applicant's obligations under the conditions of this consent and in accordance with correspondence issued by Sydney Metro (b) acts as the authorised representative of the Applicant (c) is available (or has a delegate notified in writing to Sydney Metro that is available) on a 7 day a week basis to liaise with the representative of Sydney Metro as notified to the Applicant.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• Deicorp letter to Sydney Metro, 1/7/2021</li> </ul>	The authorised representative of the Applicant is Grant Madsen of Deicorp, as notified in letter, dated 1/7/2021. Letter references parts (a), (b), & (c) of Condition D38.	Compliant
D39	Without in any way limiting the operation of any other condition of this consent, the Applicant must, during demolition, excavation and construction works, consult in good faith with Sydney Metro in relation to the carrying out of the development works and must respond or provide documentation as soon as practicable to any queries raised by Sydney Metro in relation to the works.	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• Tallawong Village CCC Meeting Minutes, 29/3/2022, 30/6/2022, 11/10/2022</li> </ul>	As per sighted communication provided throughout the audit. No direct queries. Sydney Metro are invited to attend CCC meetings, as documented in meeting minutes. Sydney Metro, Riverstone Community Group, Chairperson. Community facilities provided by Deicorp in the display centre.	Compliant
D40	Where a condition of consent requires consultation with Sydney Metro, the Applicant shall forward all requests and/or documentation to the relevant Sydney Metro interface team.	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	As per relevant consultation conditions	Compliant
D41	The Applicant must ensure that all existing and future drainage works on the development site will be directed into the appropriate local council or approved drainage system.	<ul style="list-style-type: none"> <li>• Letter from Robert Bird Group to Deicorp, dated 30/6/2021</li> <li>• Email from Blacktown City Council (Drainage Development Assessment Team Leader), dated 20/12/2021</li> </ul>	Letter confirms compliance with SSD 10425 Conditions D41 & D42. "RBG confirm that the proposed drainage solution for the development ensures that all site drainage is connected to the existing stormwater network in Conferta Avenue, it also ensures that site levels are not altered in any way that would affect the surface flows of water at the rail corridor. Temporary	Compliant

			<p><i>measures on site to ensure that the above conditions are also met during construction works will be the responsibility of the principal contractor</i>".</p> <p>Email from Council, dated 20/12/2021 refers to Condition B33 (stormwater management system), and states the plans provided "<i>satisfy Council requirements for this stage of the project</i>".</p>	
D42	The Applicant must ensure that during works no water collects on or near the railway corridor. Should water be allowed to pond adjacent to rail infrastructure facilities and service is interrupted, the Applicant shall be liable for any Sydney Metro expenditure involved with restoring or maintaining alternative services.	<ul style="list-style-type: none"> <li>Letter from Robert Bird Group to Deicorp, dated 30/6/2021</li> </ul>	As per D41	Compliant
D43	<p>If required by Sydney Metro, the Applicant must give Sydney Metro written notice at least 5 business days before any of the following events occur within 25 metres of the rail corridor</p> <p>(a) site investigations  (b) foundation, pile and anchor set out  (c) set out of any other structures below ground surface level or structures which will transfer any load or bearing  (d) foundation, pile and anchor excavation  (e) other excavation  (f) surveying of foundation, pile and anchor excavation and surveying of as built excavations  (g) other concreting; or  (h) any other event that Sydney Metro has notified to the Applicant in writing so that Sydney Metro may inspect the carrying out or completion of those works on the development site.</p>	<ul style="list-style-type: none"> <li>Interview with Auditees</li> </ul>	Deicorp advised no work has occurred within 25m of the rail corridor.	Not triggered
D44	If required by Sydney Metro, prior to the commencement of works or at any time during the excavation and construction period deemed necessary by Sydney Metro, a joint inspection of the rail infrastructure and property in the vicinity of the development is to be carried out by representatives from Sydney Metro and the Applicant and a	<ul style="list-style-type: none"> <li>Interview with Auditees</li> <li>ACE Structural Dilapidation Report</li> </ul>	Deicorp advised a joint inspection has not been requested by Metro.	Not triggered



	<p>dilapidation survey prepared. The dilapidation survey(s) will establish the extent of any existing damage and enable any deterioration during construction to be observed and rectified at the Applicant's cost. The submission of a detailed dilapidation report by the Applicant for review and approval by Sydney Metro will be required within 10 days following the undertaking of any joint inspection, unless otherwise notified by Sydney Metro in writing.</p>	<p>(Metro Assets), 191294.1, 5/7/2021</p>		
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Construction Environmental Management Plan (CEMP), Tallawong Station Precinct South – Site 2, 30 May 2022				
9.4 Air and Dust Management	Soil and other materials stored onsite will be covered to prevent dust	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• CEMP, Site 1 Early Works</li> <li>• CEMP, Site 2</li> <li>• Site inspection 10/10/2022</li> </ul>	The site was disturbed in the area of excavation for the basements, but no major stockpiles were located on Site 2 site at the time of inspection. Spoil load-out was occurring on an as-needs basis. EI Australia is responsible for waste classification as part of the implementation of the RAP. Dust risk was not present due to a recent rainfall event before the site inspection. Part of the site in the SE corner remained covered with grass, reducing risk of dust in that area.	Compliant
	Exposed areas will be watered down to prevent dust, especially on windy days and in close proximity to dwellings and public areas		Dust risk was not present due to a recent rainfall event before the site inspection.	Not triggered
	A shaker pad will be located at exits to remove soil from vehicle tyres		Shaker pads were located at both Site 2 heavy vehicle accesses.	Compliant
10 Soil and Water Management	All control measures will be installed prior to commencing works in accordance with the Soil and Water Management Plan, refer to Appendix C	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• CEMP / Soil and Water Management Plan</li> <li>• Site inspection 10/10/2022</li> <li>• Weekly site inspection checklists</li> </ul>	Site disturbance was mainly limited to the area of excavation for the basements. Surface water runoff was accumulating in the basement excavations and spoil load-out was occurring on an as-needs basis. Runoff was directed from the top of the site in the SW corner to the bottom SE corner along the fence line. A small section of this area was controlled with a sediment fence. The remainder of runoff was directed through a densely grassed area to an existing stormwater drain outside the site	Non-Compliant
	Silt fencing will be erected along batter slopes, stockpiles, and any disturbed surfaces that may drain into any adjacent water bodies and stormwater systems			
	Sandbags and other sediment controls shall be installed around stormwater inlets and outlets to prevent dirty discharge from works area entering stormwater systems.			
	Soil and waste stores will be located in designated areas to prevent run off into drains			
	Sediment barriers are required around the stockpiles			

	<p>Temporary diversion drains will be installed to divert clean run-off around the works area</p>		<p>boundary on the corner of Schofields Road and Cudegong Road.</p> <p>Water from the basement excavation was being pumped to a sediment tank, and then through an earth swale to the stormwater system.</p> <p><b>There were no ERSED controls in place along the swale, which was created with bare earth, potentially increasing sediment load prior to discharge to the stormwater system. Drainage rock had been applied by a previous contractor around the stormwater inlet outside the site on the corner of Schofields and Cudegong Road.</b></p> <p><b><u>Recommendation:</u> Review and implement the Soil and Water Management Plan to reduce the risk of sediment entering the stormwater system.</b></p> <p>Controls were in place around stormwater inlets on Conferta Ave.</p> <p>Weekly site inspection checklists were completed by the Site Manager, and available on site for review.</p>	
<p>11 Waste &amp; Material Reuse Management</p>	<p>The construction site will be kept free of rubbish, waste material and debris</p> <p>Chemical waste will be removed from site and disposed of at licenced facilities</p> <p>General waste will be stored in the designated bin/skip and removed by the waste contractor on a regular basis</p>	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• CEMP / Construction Waste Management Plan</li> <li>• Site inspection 10/10/2022</li> </ul>	<p>The site was clean with no rubbish, waste material or debris observed.</p> <p>There was no chemical waste known to have been generated during the project.</p> <p>Construction waste was confined to a designated area with skip bins and</p>	<p>Compliant</p>

	Waste monitoring will be recorded on the daily and weekly Inspection report	<ul style="list-style-type: none"> <li>Bingo Monthly Reports April – Sept 2022</li> </ul>	<p>general office waste in the site compound on Site 2.</p> <p>Bingo provide a monthly report that records the volume of materials recycled and disposed to landfill (excluding spoil).</p> <p>Waste tracking records for asbestos and other contaminated material has been verified in Condition D27, and by the Contamination Consultant (EI Australia) and EPA Auditor (Phreatic Consulting).</p>	
<b>Dewatering Management Plan (DMP) – Site 1 &amp; 2</b>				
4.2 Estimated Groundwater Volumes	<p><b>Site 2:</b> Estimates of groundwater take are as follows:</p> <ul style="list-style-type: none"> <li>0.35ML over 150 Days construction</li> <li>0.86ML over 12 months operation</li> </ul>	<ul style="list-style-type: none"> <li>Interview with Auditees (EIA, Deicorp, 25/10/22)</li> <li>Site inspection 10/10/2022</li> <li>DMP</li> </ul>	Noted	Not triggered
4.3 Dewatering Level	<ul style="list-style-type: none"> <li>Continuous monitoring of groundwater elevations (from date of consent until at least 2 months after pumping ceases)</li> <li>Monitoring of drawdown is required to validate the accuracy of the seepage model, and pumping rates should be adjusted as needed</li> <li>Estimated volume of groundwater take – validation of estimates in the Groundwater Take Assessment</li> </ul>	<ul style="list-style-type: none"> <li>Interview with Auditees (EIA, Deicorp, 25/10/22)</li> <li>Site inspection 10/10/2022</li> <li>DMP</li> <li>Groundwater level monitoring data</li> </ul>	<ul style="list-style-type: none"> <li>Groundwater elevation data (groundwater drawdown) has been presented and shows groundwater levels during construction for Site 1. At the time of the audit, the process of groundwater well installation had commenced on Site 2, though data on elevations was not yet available.</li> <li>EI Australia has indicated after one year of pumping, an <b>Annual Volume Assessment</b> would be prepared for the validation of pumped groundwater volumes during Construction against estimations. This will provide assurance to DPE/NRAR that Water Access Licence Limits</li> </ul>	Compliant

			during Construction have not been triggered.	
4.4 Dewatering Method	<ul style="list-style-type: none"> <li>Site 2 dewatering strategy</li> <li>A dewatering strategy must be agreed to confirm dewatering treatment systems and water retention tanks can be positioned appropriately within approved areas of the site, prior to the commencement of excavation works</li> </ul>	<ul style="list-style-type: none"> <li>Interview with Auditees (EIA, Deicorp, 25/10/22)</li> <li>Site inspection 10/10/2022</li> <li>DMP</li> </ul>	<p>The preparation of a <b>Site Dewatering Strategy</b> was in progress at the time of the audit. Deicorp were in the process of engaging a specialist to provide advice on water treatment options / equipment required, based on the first round of water quality monitoring results for Site 2, which were pending at the time of this IA3.</p> <p><b>As excavation had already commenced at the time of this IA3, the project was Non-Compliant with Section 4.4 of the DMP at the time of the audit for Site 2.</b></p> <p><b>Recommendation: Finalise and agree on the Dewatering Strategy for Site 2 in accordance with Section 4.4 Dewatering Method of the DMP.</b></p>	<b>Non-Compliant</b>
5.3 Groundwater Quality Monitoring	<p><b>5.3.1 Visual Monitoring</b></p> <ul style="list-style-type: none"> <li>Visual inspections of the dewatering measures and equipment should occur regularly (daily where possible).</li> <li>The Site Manager must keep a record of all visual observations, as well as flow rates to enable the determination of groundwater extraction/discharge volumes following the completion of dewatering activities.</li> </ul>	<ul style="list-style-type: none"> <li>Interview with Auditees (EIA, Deicorp, 25/10/22)</li> <li>Site inspection 10/10/2022</li> <li>DMP</li> </ul>	<p><b>Dewatering had commenced on Site 2 at the time of audit, though visual monitoring requirements as documented in the DMP had not yet been implemented.</b></p> <p><b>Recommendation: Conduct and record visual inspections (daily where possible) for Site 2 in accordance with Section 5.3 Groundwater Quality Monitoring of the DMP.</b></p>	<b>Non-Compliant</b>
	<p><b>5.3.4 Discharge Flow and Volume Monitoring</b></p> <ul style="list-style-type: none"> <li>The cumulative volume of water discharged to stormwater must be monitored by calibrated flow meter (or equivalent alternative means) to comply with regulatory requirements. This will require a regular (preferably) daily record to be maintained, to document the</li> </ul>	<ul style="list-style-type: none"> <li>Interview with Auditees (EIA, Deicorp, 25/10/22)</li> <li>Site inspection 10/10/2022</li> <li>DMP</li> </ul>	<p>A flow meter had been installed on Site 1 to measure the rate and volume of water discharged from the basement excavation.</p> <p>EIA indicated an assessment of these records would be undertaken to</p>	Not triggered

	<p>total volume discharged, and reporting of the cumulative volume discharged in the interim monitoring report.</p> <ul style="list-style-type: none"> <li>• These records will be used to calculate the actual groundwater volume discharged from the site and will be included in the final Dewatering Completion Report (Section 5.3.3) to be issued to Council and WaterNSW after the completion of dewatering activities.</li> </ul>		<p>calculate the actual groundwater volume discharged from the site and will be included in <b>the final Dewatering Completion Report</b> (Section 5.3.3) to be issued to Council and DPE Water after the completion of dewatering activities.</p> <p>Another assessment would be undertaken after 12 months of pumping to calculate the actual volume of groundwater discharged from Site 1 during Construction (to validate WAL limits have not been exceeded).</p> <p><b><i>Recommendation: Ensure a flow meter is installed at Site 2, and records maintained to ensure compliance with the DMP Section 5.3.4 Discharge Flow and Volume Monitoring</i></b></p>	
<p>5.4 Groundwater Treatment</p>	<p>All extracted groundwater that exceeds the adopted criteria values will require treatment on-site using approved technologies prior to discharge. Engagement of a suitably qualified and experienced water treatment specialist is necessarily, to design and install any treatment measures that may be required, which should include (but not necessarily be limited to):</p> <ul style="list-style-type: none"> <li>• A treatment tank with minimum capacity capable of containing the expected inflow for the basement (as described in <b>Section 4.4</b>)</li> <li>• Groundwater filtration to reduce fine particulates</li> <li>• Automated in-line chemical dosing systems for the addition of buffering solutions and coagulants for the management of water pH and other parameters, which may be required from time to time, as described in <b>Section 6.5 Dewatering Contingencies</b></li> <li>• Groundwater treatment to reduce concentrations of the metals (if required) to below the adopted criteria detailed in <b>Table 5-1</b></li> </ul>	<ul style="list-style-type: none"> <li>• Interview with Auditees (EIA, Deicorp, 25/10/22)</li> <li>• Site inspection 10/10/2022</li> <li>• DMP</li> </ul>	<p>As dewatering had just commenced on Site 2 at the time of IA3, the measures as described in Section 5.4 Groundwater Treatment of the DMP will be assessed in IA4.</p> <p><b><i>Recommendation: Implement the DMP Section 5.4 Groundwater Treatment prior to the next Independent Audit (IA4)</i></b></p>	<p>Not triggered</p>

	<ul style="list-style-type: none"> <li>Spare retention tank(s) to provide additional residence time and sedimentation, in the case that non-compliant water quality is identified during routine monitoring, triggering temporary redirection of discharge while adjustments to the water treatment system are being implemented, and</li> <li>A means of monitoring flow rate to enable the accurate determination of total discharge volume (addressed in more detail in Section 5.3.4).</li> </ul> <p>The water treatment system should be installed, tested and operational prior to the commencement of dewatering, to ensure that only treated water that meets the adopted quality criteria is discharged to stormwater.</p>			
<b>Air Quality Management Plan (AQMP)</b>				
AQ2	Ensure all vehicles leaving the site pass a rumble-grid and pit prior to exiting, with physical removal of dirt / mud using a pressure washer if required	<ul style="list-style-type: none"> <li>Interview with Auditees</li> <li>Site inspection 10/10/2022</li> </ul>	There were no vehicles entering or leaving the site due to the nature of the works at the time of inspection, though shaker grids were in place at both heavy vehicle access points to Site 2 as required. There was no heavy vehicle access to Site 1 as the building formwork was out of the ground.	Not triggered
AQ3	The roads surrounding the site shall be regularly swept to ensure pavements are kept free of dust	<ul style="list-style-type: none"> <li>Site inspection 10/10/2022</li> </ul>	A street sweeper was engaged as required. There was minimal evidence of tracking onto public roads.	Compliant
AQ10	Use solid 2.4m or 3m high hoardings at the site perimeter, and wind barriers at internal excavation boundaries where possible	<ul style="list-style-type: none"> <li>Interview with Auditees</li> <li>Site inspection 10/10/2022</li> </ul>	2.7m hoardings were in place around both sites.	Compliant
AQ16	Apply covers, odour sealant or odour suppressant to control odours generated at the point of excavation or at stockpiles, where required	<ul style="list-style-type: none"> <li>Interview with Auditees</li> <li>Site inspection 10/10/2022</li> </ul>	Odour had not been identified as an issue at the site to date.	Compliant
Section 5.0 Air Quality	Implement dust monitoring requirements (PM10, VOCs & SVOCs & Odour) where required	<ul style="list-style-type: none"> <li>Interview with Auditees</li> </ul>	Dust was not a significant issue due to ongoing La Nina weather events. The	Compliant

Monitoring Strategy		<ul style="list-style-type: none"> <li>• Site inspection 10/10/2022</li> </ul>	<p>AQMP states “continuous monitoring of dust is not recommended for the Project”. “However, in case of multiple substantiated dust complaints, or persistent visible observed dust leaving site, monitoring may be required”.</p> <p>There were no complaints known to be issued in relation to dust and dust is unlikely to be a persistent issue.</p>	
<b>Construction Noise and Vibration Management Plan (CNVMP)</b>				
5.5 Recommendations	Rock breaking or rock hammering should be limited to the times identified in condition D7	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• Site inspection 10/10/2022</li> <li>• CNVMP</li> </ul>	<p>There were no highly noise intensive works being undertaken at the time of the audit, e.g. rock breaking or saw cutting. Piling and excavation was underway on Site 2 and FRP was underway on Site 1 but were not noticeably noisy.</p> <p>The Deicorp Construction Manager indicated he was aware of the respite periods and requirements in D7 around the timing of noise intensive works. All works are within or close to the site boundary (e.g. concrete pumping from Conferta Ave to Site 1 site). <b>Deicorp may need to consider the implementation of additional noise mitigation measures once works extend above the site hoarding.</b></p> <p>No complaints are known to have been made in relation to noise for the project to date. The nearest receivers to the excavation works are south of Site 2 in Zone R2 on Schofields Road.</p> <p>Deicorp advised no rock hammering had occurred to date on Site 2.</p>	Not triggered

<p>5.6 Vibration monitoring</p>	<p>Vibration monitoring is recommended when rock hammering is required to be undertaken (generally limited to the excavation stage of the project) at the following locations:</p> <ul style="list-style-type: none"> <li>• Eastern boundary of the site – representative of the switching station</li> <li>• Southern boundary of the site – representative of worst affected residents</li> </ul> <p>In the event that ongoing construction activities are considerably below the relevant vibration levels, it is recommended that vibration monitoring requirement for the project be reviewed with the relevant stakeholders.</p>	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• Site inspection 10/10/2022</li> <li>• CNVMP</li> <li>• Acoustic Logic Monthly Vibration Monitoring Reports 2-12, dated - 2/11/2021-11/4/2022</li> <li>• Email from Acoustic Logic, dated 3/05/2022</li> </ul>	<p>According to the CNVMP, the requirement for vibration monitoring is triggered during rock hammering.</p> <p>For Site 1, vibration monitoring is recommended at the northern boundary of the site adjacent to the Tallawong Metro Station as well as the eastern boundary (switching station). Daily vibration monitoring was conducted by Acoustic Logic in accordance with the document entitled '<i>Monitoring Plan for Sydney Water</i>' prepared by EI Australia (ref: E24445.G10, dated 17/09/2021). Monitoring is required during demolition and excavation for the protection of Sydney Water assets.</p> <p>Email from Acoustic Logic, dated 3/05/2022 confirms that active real time vibration monitors are in place along the site boundaries, and monitoring is conducted in accordance with Condition D20 and Section 5.6 of the CNVMP.</p> <p>For Site 2, Deicorp advised no rock hammering has been required to date, so requirement to conduct vibration monitoring has not been triggered.</p> <p><b><i>Recommendation: Ensure vibration monitoring is conducted at the southern and eastern boundaries of Site 2 in the event rock hammering is required. Comply with Section 5.6 Vibration monitoring of the CNVMP.</i></b></p>	<p>Compliant</p>
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<p>5.6 Vibration monitoring</p>	<p>The ETM vibration monitors can be downloaded remotely to actively review all monitoring data recorded at the monitoring location, including any vibration events found to exceed levels nominated in Section 4.2 (of the CNVMP).</p> <p>In the event multiple events exceeding the nominated trigger levels are recorded, all data recorded by the monitor is to be reviewed and forwarded to a nominated representative of the building contractor. It is proposed that reports are provided at regular intervals, with any exceedance in the nominated vibration criteria documented.</p>	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> </ul>	<p>For Site 2, Deicorp advised no rock hammering has been required to date, so requirement to conduct vibration monitoring has not been triggered.</p>	<p>Not triggered</p>
<p>5.5 Recommendations</p>	<p><b>Complaints handling:</b></p> <ul style="list-style-type: none"> <li>• An after hours contact number is displayed outside the building site, so that in the event that surrounding development believed that a noise breach is occurring, they may contact the site.</li> <li>• In the event of a complaint, the procedures outlined in Section 8 are to be adopted. Additional methods of control of construction noise and additional noise control measures which may be adopted by the site are detailed in Section 6 and 7.</li> <li>• In the event of strong community reaction to construction noise, or complaint from a specific receiver, attended noise measurements may be required to quantify the levels of construction noise at identified locations. The measured levels are to be compared to the relevant management levels, and where exceedances are identified a review of the reasonable and feasible measures in place to be undertaken to further mitigate noise impacts.</li> </ul>	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• Site inspection 10/10/2022</li> </ul>	<p>No noise complaints known to have been made in relation to the project.</p>	<p>Not triggered</p>

<p>5.6.5 Additional Recommendations</p>	<p><b>Materials handling/vehicles:</b></p> <ul style="list-style-type: none"> <li>• Vehicles not to idle outside of site prior to working hours</li> <li>• Access routes to and from site should be planned to minimise noise impact on nearby residential receivers</li> <li>• Trucks and bobcats to use non-tonal reversing beacon (subject to WHS requirements) to minimise potential disturbance to neighbours</li> <li>• Avoid careless dropping of construction materials into empty trucks</li> <li>• Trucks, trailers and concrete trucks (if feasible) should turn off their engines during idling to reduce noise impacts.</li> </ul>	<ul style="list-style-type: none"> <li>• Interview with Auditees</li> <li>• Site inspection 10/10/2022</li> <li>• Earthworx Plant Pre-Start, excavator 26/9/2022</li> </ul>	<p>There have been no known exceedances of the noise trigger level at receiver locations as per the CNVMP.</p> <p><b>Observation:</b> Plant Pre-Start checks did not include the verification of reversing travel alarms.</p> <p><b>Recommendation:</b> <i>Update the Plant Pre-Start Checklist to include the requirement for reversing quackers for all plant and equipment where relevant.</i></p>	<p>Compliant</p>
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## **Independent Environmental Audit Report**

**Deicorp Construction Pty Ltd**

**Tallawong Station Precinct South (SSD 10425)  
Rouse Hill NSW**

**Attachment 2: Planning Secretary Appointment of Experts**



Poonam Chauhan  
Deicorp  
Level 3, 161 Redfern Street  
Redfern NSW 2016

29/07/2021

Dear Ms Chauhan

**Tallawong Station Precinct South Stage 2 (SSD 10425)  
Condition A24 – Request for approval of Independent Auditor**

I refer to your request (SSD-10425-PA-5) for the Secretary's approval of suitably qualified persons to prepare the first Independent Environmental Audit for the Tallawong Station Precinct South Stage 2 (SSD 10425).

The Department has reviewed the nomination and information you have provided and is satisfied that the expert is suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment to prepare the first Independent Environmental Audit.

In accordance with Schedule 2, Condition A24 of SSD 10425 (the consent) and the *Independent Audit Post Approval Requirements* (Department 2020), the Secretary has agreed to the following Independent Auditor:

- Ms Josephine Heltborg, Principal Environmental Consultant

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the *Independent Audit Post Approval Requirements* (Department 2020). Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed auditor for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you wish to discuss the matter further, please contact Samuel Condon on (02) 8275 1169.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Pope', written in a cursive style.

Julia Pope  
Team Leader Compliance - Metro  
Compliance

As nominee of the Planning Secretary

## **Independent Environmental Audit Report**

**Deicorp Construction Pty Ltd**

**Tallawong Station Precinct South (SSD 10425)  
Rouse Hill NSW**

**Attachment 3: Independent Audit Declaration Form**

## Declaration of Independence Form (Independent Audit Compliance Requirements, Appendix A)

### Declaration of Independence Form

<b>Project name</b>	Tallowong Station Precinct South
<b>Consent Number</b>	SSD 10425
<b>Description of Project</b>	Construction of a staged mixed-use development (Tallowong Station Precinct South) comprising: <ul style="list-style-type: none"><li>• 17 buildings of between 2 and 8 storeys to a maximum height of 34.69m (RL 91.600)</li><li>• Maximum gross floor area (GFA) of 93,393m<sup>2</sup></li><li>• 987 dwellings</li><li>• Retail, commercial and community uses of approximately 9,000m<sup>2</sup> GFA</li><li>• 5% affordable housing (50 dwellings)</li><li>• Basement for car parking and services</li><li>• Land and stratum subdivision</li><li>• Landscaping of the public and private domain</li><li>• Publicly accessible park</li><li>• New public and private roads and pedestrian connection</li></ul>
<b>Project Address</b>	1-15 and 2-12 Conferta Avenue, Rouse Hill, Lots 293 and 294/DP 1213279
<b>Proponent</b>	Deicorp Construction Pty Limited
<b>Date of Determination</b>	20 July 2021

I declare that:

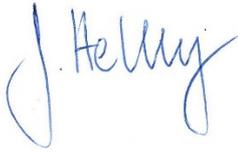
- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project.
- iv. I am not an Environmental Representative for the project; and
- v. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a. Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b. The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B

## Declaration of Independence Form (Independent Audit Compliance Requirements, Appendix A)

(giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

<b>Name of Proposed Auditor</b>	Josephine Heltborg
<b>Signature</b>	
<b>Qualification</b>	Master of Environmental Management Exemplar Global Auditor Number 111000
<b>Company</b>	Morasey Environment Pty Ltd
<b>Date</b>	22 July 2021

## **Independent Environmental Audit Report**

**Deicorp Construction Pty Ltd**

**Tallawong Station Precinct South (SSD 10425)  
Rouse Hill NSW**

**Attachment 4: Audit Attendee List | IA3**

**SSD10425 TALLAWONG STATION PRECINCT SOUTH STAGE 1  
INDEPENDENT ENVIRONMENTAL AUDIT 3  
10 OCTOBER 2022**

OPENING MEETING - ATTENDEES		
NAME	POSITION & COMPANY	SIGNATURE
J. Heltborg	Auditor, Morasey	
G. Madsen	Project Manager, Deicorp	
M. Liang	Contracts Administrator, Deicorp	
J. Ekonomou	Project Manager, Deicorp	
CLOSING MEETING - ATTENDEES		
NAME	POSITION & COMPANY	SIGNATURE
J. Heltborg	Auditor, Morasey	
G. Madsen	Project Manager, Deicorp	
M. Liang	Contracts Administrator, Deicorp	
J. Ekonomou	Project Manager, Deicorp	

## **Independent Environmental Audit Report**

**Deicorp Construction Pty Ltd**

**Tallawong Station Precinct South (SSD 10425)  
Rouse Hill NSW**

**Attachment 5: Consultation Records | IA3**

## Jo Heltborg

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**From:** Jo Heltborg  
**Sent:** Wednesday, 21 September 2022 2:37 PM  
**To:** compliance@planning.nsw.gov.au  
**Cc:** Paula Bizimis  
**Subject:** Independent Audit 3 - SSD 10425 Tallawong Station Precinct South  
**Attachments:** Attachment 2 A24 - Appointment of Experts\_29072021\_072143.pdf; Attachment 3 Auditor Declaration\_JHeltborg.pdf

To Whom it May Concern,

As the independent auditor engaged by Deicorp Construction Pty Ltd for the Tallawong Station Precinct South project, located at 1-15 and 2-12 Conferta Avenue, Rouse Hill NSW (SSD 10425), I am consulting with the Department in accordance with Section 3.2 of the DPE Independent Audit PARs, 2020 (IAPARs).

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- Assessment of compliance with Parts A & D of SSD 10425 (that may be relevant at the time of the audit)
- An assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- An assessment of the environmental performance of the development, including:
  - Actual impacts compared to predicted impacts in the environmental impact assessment (EIA);
  - The physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;
  - Incidents, non-compliances and complaints that occurred or were made during the audit period;
  - The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
  - Feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- Any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

The site inspection for the third audit (IA3) is scheduled on 10<sup>th</sup> October 2022.

If you would like any additional considerations taken into account during the audit (including other agency consultation), or require any additional information please let me know.

Kind regards,

**III MORASEY**

**Josephine Heltborg**

Independent Auditor | Tallawong Precinct South  
Morasey Environment Pty Ltd

## Jo Heltborg

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**From:** Jo Heltborg  
**Sent:** Wednesday, 21 September 2022 2:34 PM  
**To:** council@blacktown.nsw.gov.au  
**Subject:** Independent Audit 3 - SSD 10425 Tallawong Station Precinct South

Good Morning,

I am the Independent Auditor for the Tallawong Station Precinct South project, located at 1-15 and 2-12 Conferta Avenue, Rouse Hill NSW (SSD 10425).

Morasey Environment Pty Ltd is currently preparing to undertake the third Independent Audit on the Project. The audit is required to be conducted in accordance with SSD 10425, Part C Condition C23 and the Department of Planning and Environment's *Independent Audit Post Approval Requirements* (or IAPAR).

The consent is available at the following link: <https://www.planningportal.nsw.gov.au/major-projects/project/26916>

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Inspections-and-enforcements/Independent-audit-post-approval-requirements>

The audit is scheduled to occur on 10<sup>th</sup> September 2022 and pertains to post-approval requirements and compliance during Construction.

In accordance with Section 3.2 of the Department's IAPAR, we are consulting with the City of Blacktown Council. We understand that any advice provided during the assessment phase was considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of compliance with each condition of consent applicable to the phase of the development that is being audited, along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

We kindly request the City of Blacktown let us know if there are any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. We look forward to hearing from you.

Kind regards,

**III MORASEY**

**Josephine Heltborg**  
Independent Auditor | Tallawong Precinct South  
Morasey Environment Pty Ltd

## Jo Heltborg

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**From:** Jo Heltborg  
**Sent:** Wednesday, 21 September 2022 2:40 PM  
**To:** nrar.enquiries@nrar.nsw.gov.au  
**Cc:** Jessica Braden; bronwyn.smith@environment.nsw.gov.au  
**Subject:** Independent Audit 3 - SSD 10425 Tallawong Station Precinct South

To Whom it May Concern / (DPE Water/NRAR, DPE EES),

As the independent auditor engaged by Deicorp Construction Pty Ltd for the Tallawong Station Precinct South project, located at 1-15 and 2-12 Conferta Avenue, Rouse Hill NSW (SSD 10425), I am consulting with the Department in accordance with Section 3.2 of the DPE Independent Audit PARs, 2020 (IAPARs).

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- Assessment of compliance with Parts A & D of SSD 10425 (that may be relevant at the time of the audit)
- An assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- An assessment of the environmental performance of the development, including:
  - Actual impacts compared to predicted impacts in the environmental impact assessment (EIA);
  - The physical extent of the development in comparison with the approved boundary, and any potential off-site impacts;
  - Incidents, non-compliances and complaints that occurred or were made during the audit period;
  - The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
  - Feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- Any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

The site inspection for the third audit (IA3) is scheduled on 10<sup>th</sup> October 2022.

If you would like any additional considerations taken into account during the audit, or require any additional information please let me know.

Kind regards,

**III MORASEY**

**Josephine Heltborg**  
Independent Auditor | Tallawong Precinct South  
Morasey Environment Pty Ltd

## Jo Heltborg

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**From:** Jo Heltborg  
**Sent:** Wednesday, 21 September 2022 2:42 PM  
**To:** Info MetroNorthWest  
**Subject:** Independent Audit 3 - SSD 10425 Tallawong Station Precinct South

Good Morning,

I am the Independent Auditor for the Tallawong Station Precinct South project, located at 1-15 and 2-12 Conferta Avenue, Rouse Hill NSW (SSD 10425).

Morasey Environment Pty Ltd is currently preparing to undertake the third Independent Audit on the Project. The audit is required to be conducted in accordance with SSD 10425, Part C Condition C23 and the Department of Planning and Environment's *Independent Audit Post Approval Requirements* (or IAPAR).

The consent is available at the following link: <https://www.planningportal.nsw.gov.au/major-projects/project/26916>

The IAPAR is available at the following link: <https://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Inspections-and-enforcements/Independent-audit-post-approval-requirements>

The audit is scheduled to occur on 10<sup>th</sup> October 2022 and pertains to post-approval requirements and compliance during Construction.

In accordance with Section 3.2 of the Department's IAPAR, we are consulting with Sydney Metro Northwest. We understand that any advice provided during the assessment phase was considered by the Department and the Project was approved subject to conditions.

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of compliance with each condition of consent applicable to the phase of the development that is being audited, along with all post approval documents prepared to satisfy the Conditions of Consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth.

We kindly request Sydney Metro Northwest let us know if there are any key issues it would like examined, relating to post-approval requirements and compliance.

Any questions please let me know. We look forward to hearing from you.

Kind regards,

**||| MORASEY**

**Josephine Heltborg**  
Director | Principal Environmental Consultant  
Morasey Environment Pty Ltd