

1 August 2023

The Planning Secretary  
Department of Planning and Environment  
4 Paramatta Square, 12 Darcy Street  
**PARRAMATTA NSW 2150**

Dear Planning Secretary,

**SSD-10424 Riverview Stage 2 Development – Wingaru**  
**Response to Independent Environmental Audit Report #1**

We write on behalf of the St Ignatius' College Riverview with regards to its development at 2-60 Riverview Street and Tambourine Bay Road, Riverview.

Please find enclosed the first independent Environmental Audit Report (the 'Audit'), dated 21 July 2023.

We note that the Audit found 3 non-compliances. Section 3 of the Audit sets out Recommends and Observations for Improvement.

Attached at **Appendix A** is our response to the auditor's findings and recommendations.

A copy of the report and this letter of response will be uploaded to the project website in due course in accordance with condition A39 (c).

Yours sincerely,

**EPM Projects**



**Jordan Graham**  
Associate



## APPENDIX A – Proponent Response to Audit Findings

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
Non-Compliances					
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) generally, in accordance with the EIS, Response to Submissions (RtS), Supplementary Response to Submissions (SRtS) and SSD-10424-Mod-1; (d) in accordance with the approved plans in the table below:	Compliance with conditions A25 and C16 have not been demonstrated.	Proponent to address all the non-compliances noted during this audit.	Agreed with recommendation.	N/A
A25	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: a) make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in condition A2 of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent; (v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (vi) a summary of the current stage and progress of the development; (vii) contact details to enquire about the development or to make a complaint;	The following information was not available on the website- (a) (i) Landscape Plans prepared by Arcadia, Response to Submissions and EIS appendices (ii) MOD Approval 29/22/2022 (iii) C9 CEMP, CTPMSP, CNVMP, CSWMSP B5 Landscape Plan, B10 (b) Stormwater Management System Plans, (iv) Construction has commenced, no performance reporting. (v) Construction has commenced, no performance reporting. (vi) A summary of the current stage and progress of the development.	Update the website to include all information that is required by the consent to be made publicly available.	Agreed with recommendation. Missing documentation on hand will be uploaded by 1/8/23. We note that we believe compliance with A25 (vi) is met through the ' <a href="#">Community Notifications</a> ' page. For clarity we will add a direct hyperlink to this page from the <a href="#">Compliance Documentation</a> page. Acoustic monitoring has commenced in accordance with the CVNSMP and the first report will be uploaded by 1/9/23	1/09/23

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
	<p>(viii) a complaints register, updated monthly;</p> <p>(ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;</p> <p>(x) any other matter required by the Planning Secretary; and</p> <p>b) keep such information up to date, to the satisfaction of the Planning Secretary, and publicly available for 12 months after the commencement of operations.</p>				
C16	<p>Prior to the commencement of any construction, an induction must be provided to all construction staff, employees, contractors and sub-contractors in respect of Aboriginal heritage protection and their responsibilities under the National Park Act 1974 by a suitably qualified archaeologist. A written induction must also be provided and included in all environmental and safety documentation for future reference.</p>	<p>Sited a copy of the site induction template - Saint Ignatius' College Riverview Induction (25755-151). Induction does not reference Aboriginal heritage protection</p>	<p>Revise induction content to include relevant references in accordance with this condition.</p>	<p>The induction will be revised to comply with this condition.</p>	1/08/23
Observations (Recommendations for Improvement)					
A11	<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 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>	<p>An attempt was made to consult on the CTPMSP, the email was acknowledged by the recipient. There is no additional information relating further consultation attempts, there was no overview of consultation outcomes.</p>	<p>Consultation evidence to be included in the relevant plan. Where responses were not received, evidence of follow up to be included in the plan. Include an overview statement of consultation undertaken.</p>	<p>Agreed with recommendation.</p>	1/09/23
A22	<p>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.</p>	<p>The CEMP and sub-plans refer to relevant guidelines and policies. However, the CEMP does not refer to Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020).</p>	<p>Update the CEMP and sub-plans to include reference to relevant standards or policies identified by the consent.</p>	<p>Agreed with recommendation.</p>	1/09/23
A26	<p>The Applicant must ensure that all its employees, contractors (and their sub-contractors) are made aware of, and are</p>	<p>Whilst there is reference in the induction package to legislation and</p>	<p>Update induction package to include</p>	<p>Agreed with recommendation.</p>	1/9/23

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
	instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	standards/codes, there is no explicit reference or instruction for workers to comply with the SSD Conditions of Consent.	compliance with legislation, standards/codes, and the SSD Conditions of Consent. Additional information regarding where this information can be obtained.		
C8	<p>Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020).</p> <p>Note:</p> <ul style="list-style-type: none"> <li>▪ The Environmental Management Plan Guideline is available on the Planning Portal at: <a href="https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval">https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval</a></li> <li>▪ The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans. Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020).</li> </ul>	The CEMP does not reference the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020).	Review CEMP against the requirements of the EMP Guideline, DPIE April 2020. Update CEMP with reference to the EMP Guideline, DPIE April 2020.	Agreed with recommendation.	1/9/23
C11	<p>The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:</p> <ol style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced person(s);</li> <li>b) be prepared in consultation with Council and TfNSW/ TfNSW (RMS);</li> <li>c) be consistent with the Preliminary Construction Traffic and Pedestrian Plan prepared by Positive Traffic Pty Ltd dated October 2020 submitted with the EIS;</li> <li>d) include details of predicted number of construction vehicle movements per day and detail of vehicle types, noting that vehicle movements are to be minimised during peak traffic periods;</li> </ol>	<p>The CTPMSP does not explicitly identify the credentials of the author.</p> <p>An attempt was made to consult with relevant authorities.</p>	To demonstrate that the author is suitably qualified and experienced, update the CTPMSP to include author qualifications and experience.	Agreed with recommendation.	1/9/23

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
	<ul style="list-style-type: none"> <li>e) (e) include assessment of potential impacts to general traffic, cyclists, pedestrians and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works;</li> <li>f) (f) include details to demonstrate the construction vehicle access arrangements and student / staff access to the site during construction works to ensure safe operation of the school at all times;</li> <li>g) (g) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services;</li> <li>h) (h) detail the measures regarding existing students and operation; and</li> <li>i) (i) detail heavy vehicle routes, access and parking arrangements.</li> </ul>				
C12	<p>The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified and experienced noise expert;</li> <li>b) describe procedures for achieving the noise management levels in EPA's Interim</li> <li>c) Construction Noise Guideline (DECC, 2009) and the noise guidelines criteria in section 5.4 of the SEARs Acoustic Report Riverview Ignis Project - Stage 2, prepared by PKA Acoustic Consulting dated 14 October 2020 (R02v1);</li> <li>d) describe the measures to be implemented to manage high noise generating works such</li> <li>e) as piling, in close proximity to sensitive receivers;</li> <li>f) include details of hours within which the rock hammering, sheet piling, pile driving and similar activities are proposed to be scheduled, such as (but not limited to): <ul style="list-style-type: none"> <li>(i) 9am to 12pm, Monday to Friday;</li> <li>(ii) 2pm to 5pm Monday to Friday; and</li> <li>(iii) 9am to 12pm, Saturday.</li> </ul> </li> <li>g) include strategies that have been developed with the community for managing high noise generating works;</li> </ul>	<p>Part (e) High noise impact activities were predicted to be of minimal duration. The plan recommends notification of affected neighbours and provision of options for response to remedial action taken. The plan does not indicate that strategies have been developed with the community for managing high noise generating works.</p>	<p>Engagement with residents potentially impacted by high noise activities. Discuss options for noise impact mitigation, provide an opportunity for comment. Review and update CNVMSP to include this engagement.</p>	<p>Agreed with recommendation.</p>	<p>1/9/23</p>

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
	<ul style="list-style-type: none"> <li>h) describe the community consultation undertaken to develop the strategies in condition C12(e);</li> <li>i) includes details of the noise management measures (including scheduling of high noise generating activities, noise barriers within the site, hoardings etc) that would be installed to ensure that students / staff are not impacted by the construction noise;</li> <li>j) include a complaints management system that would be implemented for the duration of the construction; and</li> <li>k) (l) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures.</li> </ul>				
C13	<p>The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMSP) and the plan must address, but not be limited to the following:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified expert, in consultation with Council;</li> <li>b) describe all erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils &amp; Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book';</li> <li>c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site);</li> <li>d) detail all off-site flows from the site; and</li> <li>e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 5-year ARI.</li> </ul>	The CSWMP does not identify the credentials of the author, nor does it refer to consultation with council.	To demonstrate that the author is suitably qualified and experienced, update the CTPMSP to include author qualifications and experience. Consultation evidence to be included in the plan. Where responses were not received, evidence of follow up to be included in the plan.	Agreed with recommendation.	1/9/23
C16	Prior to the commencement of any construction, an induction must be provided to all construction staff, employees, contractors and sub-contractors in respect of Aboriginal heritage protection and their responsibilities under the National Park Act 1974 by a suitably qualified archaeologist. A written induction must also be provided and included in all environmental and safety documentation for future reference.	Sited a copy of the site induction template - Saint Ignatius' College Riverview Induction (25755-151). Induction does not reference Aboriginal heritage protection	Revise induction content to include relevant references in accordance with this condition.	Agreed with recommendation.	1/09/23

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response	Proposed Action Due Date
D20	<p>During construction, the Applicant must ensure that:</p> <ul style="list-style-type: none"> <li>(a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust;</li> <li>(b) all trucks entering or leaving the site with loads have their loads covered;</li> <li>(c) trucks associated with the development do not track dirt onto the public road network;</li> <li>(d) public roads used by these trucks are kept clean; and</li> <li>(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</li> </ul>	<p>Auditee advised that the stockpile located in the stockpile management area has been in place for at least 1 month. Dust and Air Quality Management Plan, section 4.2.4 - long standing stockpiles (greater than 1 month) shall be seeded to provide both wind and water erosion protection with crops or other covers.</p>	<p>Manage stockpile in accordance with the Dust and Air Quality Management Plan. Consider revising the prescriptive management option in the plan to allow alternative stabilisation measures to be utilised.</p>	<p>Agreed with recommendation.</p>	<p>1/9/23</p>
D21	<p>During construction, the Applicant must ensure that:</p> <ul style="list-style-type: none"> <li>(a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust;</li> <li>(b) all trucks entering or leaving the site with loads have their loads covered;</li> <li>(c) trucks associated with the development do not track dirt onto the public road network;</li> <li>(d) public roads used by these trucks are kept clean; and</li> <li>(e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.</li> </ul>	<p>Auditee advised that the stockpile located in the stockpile management area has been in place for at least 1 month. Dust and Air Quality Management Plan, section 4.2.4 - long standing stockpiles (greater than 1 month) shall be seeded to provide both wind and water erosion protection with crops or other covers.</p>	<p>Implement Erosion sediment controls in accordance with CSWMSP.</p>	<p>Agreed with recommendation.</p>	<p>1/9/23</p>
D30	<p>The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.</p>	<p>Data is missing from the column 'Weight (Tonne)', register includes a waste destination, however, it does not indicate any proposed reuse (destination labelled St Ignatius College Site has been assumed as reuse). Details of permissibility (EPL / Development Consent) for the receiving facility are not included.</p>	<p>Complete all columns on the register (N/A as required). Update register to include details of waste facility permissibility to accept waste.</p>	<p>Agreed with recommendation.</p>	<p>1/9/23</p>