



Independent Environmental Audit Program

42 Honeysuckle Drive Newcastle (SSD-10378)

Trigalana Environmental Pty Ltd

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42 Honeysuckle Drive, Newcastle

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TABLE OF CONTENTS

	Page
1 Introduction.....	3
1.1 Project overview.....	3
1.2 Independent Auditor.....	3
1.3 Health and Safety.....	3
2 Requirements and Audit Scope.....	5
2.1 Conditions of approval.....	5
2.2 Regulatory Framework.....	5
2.3 ISO 19011 – Guidelines for Auditing Management Systems.....	6
2.4 Scope of Audit.....	6
3 Methodology.....	8
3.1 Pre-Audit Planning and Document review.....	8
3.2 Audit Scope.....	8
3.3 Audit Schedule.....	8
3.4 Opening and Closing meetings.....	9
3.5 Site inspections and audit.....	9
3.6 Records.....	10
3.7 Evaluation of Compliance.....	10
3.7.1 Status Descriptors.....	10
4 Remote Audit Techniques and Requirements.....	11
5 Audit report.....	12
5.1 Version control.....	12
5.2 Contents.....	12
5.3 Review and Finalisation.....	12
5.4 Submission.....	12

1 Introduction

1.1 Project overview

On 8th December 2021, the NSW Government approved the construction of an eight-storey mixed use development located at 42 Honeysuckle Drive, Newcastle. The development includes an eight-level hotel and an eight-storey commercial office building including ground floor retail premises and internal carpark. The Applicant for the development is Doma Holdings (Honeysuckle) Pty Ltd, hereafter named Doma.

Key features of the project include:

- Construction and use of a building which has a three-storey podium from which a high-quality commercial tower sits upon and connects to the hotel component above the common podium building
- Landscaping works including:
 - A courtyard located on top of the podium which separates the commercial and hotel component and open to the sky
 - Ground Floor planting within site setback areas; and
 - Planting on building façade including the southern façade facing the light-rail.
- Associated carparking spaces from the Ground Level to level four, as well as Ground Floor loading and servicing facilities and ancillary works.

The proposal is identified as being a State Significant Development (SSD) under Schedule 2 Clause 2 of the State Environmental Planning Policy (State and Regional Development) 2011. This is due to the site being located within the Honeysuckle precinct and the proposed development having a capital investment value (CIV) of more than \$10 million.

Condition C22 to C26 of the State Significant Development Consent no. 10378 requires independent audits to be conducted during the construction and operational phases of the Project. Trigalana Environmental has been engaged by Doma to complete the Independent Environmental Audits for the Project to satisfy the requirements of the Development Consent Conditions C22 to C26.

1.2 Independent Auditor

The contact details and qualification of Trigalana Environmental nominated auditor for this project is provided in Table 1 below.

Table 1 Trigalana Environmental Auditor

Name	Contact Details	Qualifications & Experience
Richard Peterson	M: 0429 227 775 E: richard.peterson@trigalana-outlook.com	Management Systems Auditing, Exemplar Global Leading Management Systems Audit Team, Exemplar Global Over 20 years of auditing experience Auditor for Huntington's Development, Honeysuckle Drive Newcastle

1.3 Health and Safety

The Independent Environmental Auditor will attend the construction contractor's visitor safety induction, if required and will comply with any reasonable direction or instruction to ensure their own safety and the safety of others.

The Independent Environmental Auditor will provide their own basic safety equipment including but not limited to high visibility shirt/vest, long sleeve shirt, hard hat, safety glasses and hearing protection if required.

The Independent Environmental Auditor will provide to the construction contractor the OH&S General Induction in NSW card “White Card”.

2 Requirements and Audit Scope

2.1 Conditions of approval

The Development Consent for State Significant Development (SSD) 10378 provides approval for the construction and operation of 42 Honeysuckle Drive, Newcastle Stage 2. Doma must comply with Schedule 2 of the SSD 10378 which outlines the conditions during the pre-construction, construction, and post construction phases. These include environmental standards and guidelines and the implementation of mitigation measures identified in the Environmental Impact Statement (EIS).

The conditions that relate to the Independent Environmental Audit are Conditions C22- C26 as follows.

C22. No later than one month before the commencement of construction or within another timeframe agreed with the Planning Secretary, a program of independent environmental audits must be prepared for the development in accordance with AS/NZS ISO 19011-2014: Guidelines for Auditing Management Systems (Standards Australia, 2014) and submitted to the Planning Secretary for information.

C23. The scope of each audit must be defined in the program. The program must ensure that environmental performance of the development in relation to each compliance requirement that forms the audit scope is assessed at least once in each audit cycle.

C24. The environmental audit program prepared and submitted to the Planning Secretary in accordance with conditions C22 and C23 above must be implemented and complied with for the duration of the development.

C25. All independent environmental audits of the development must be conducted by a suitably qualified, experienced, and independent team of experts and be documented in an audit report which:

- (a) assesses the environmental performance of the development, and its effects on the surrounding environment including the community*
- (b) assesses whether the development is complying with the terms of this consent*
- (c) reviews the adequacy of any document required under this consent; and*
- (d) recommends measures or actions to improve the environmental performance of the development, and improvements to any document required under this consent.*

C26. Within three months of commencing an Independent Environmental Audit, or within another timeframe agreed by the Planning Secretary, a copy of the audit report must be submitted to the Planning Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Planning Secretary.

Note: The audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Planning Secretary.

Trigalana Environmental has been engaged by Doma to complete the Independent Environmental Audit for the Project to satisfy State Significant Development (SSD) 10378 Schedule 2 Conditions C22 to C26.

2.2 Regulatory Framework

Department of Planning, Industry and Environment

The Department of Planning and Environment (DPE) is partly responsible for administering and enforcing the Environmental Planning and Assessment Act. The Minister of Planning and Public Spaces is the Consent Authority that granted the Development Consent for this Project on the 8 December 2021. The Planning Secretary is responsible for the implementation, or any actions or measures contained in a document relating to strategy, study, system, plan, program, review, audit, notification, report or correspondence, as well as reviewing and approving all matters relating to this Project. Documents such as Construction Plan, CEMPs and Community Communication Strategies, including any variation to Approved Plan must be satisfactory to the relevant Certifying Authority.

2.3 ISO 19011 – Guidelines for Auditing Management Systems

The Independent Environmental Audits will follow ISO 19011 – Guidelines for Auditing Management Systems. This standard provides guidance on auditing management systems, including the principles of auditing, managing an audit programme, and conducting management system audits.

Independent Environmental Audits will follow the six principles of auditing (integrity, fair presentations, due professional care, confidentiality, independence, and evidence-based approach).

2.4 Scope of Audit

Trigalana Environmental will undertake Independent Environmental Audits for the construction and operational phase of the 42 Honeysuckle Drive, Newcastle development. The audits will be undertaken in accordance with this Audit Program and will address compliance with the relevant Conditions as detailed in the Development Consent and the Department of Planning and Environment's Independent Audit Post Approval Requirements. These documents will also be drawn upon in developing the audit criteria and checklist as preparatory documents for the audit.

In accordance with Independent Audit Post Approval Requirements, Trigalana Environmental will conduct the audit to include the following:

- Assessment of compliance with Development Consent Conditions applicable to the phase of the development that is being audited.
- Assessment of the adequacy and implementation of the Environmental Management Plans and associated Sub-Plans.
- Assessment of environmental performance of the development which includes but not limited to incidents, non-compliances and complaints that occurred or were made during the audit periods.
- The status of previous Independent Audit findings and their implementation, recommendations, and actions (if any).
- A high-level review of the Project's environmental management systems.
- Commence each audit with an opening meeting and conclude with a closing meeting.
- Conduct on-site interviews with key personnel involved in the project delivery including those with responsibility for environmental management.
- Conduct a physical site inspection covering all development areas and environmental aspects of the Independent Environmental Audit.
- Evaluate the Independent Audit findings as compliance or non-compliance based on verifiable evidence collected during the audit.
- Any other matters considered relevant by the auditor or the Department considering relevant regulatory requirements and legislation and knowledge of the development's past performance.

In addition, our methodology of the Independent Environmental Audit is outlined in Section 3 of this plan, and will include the following:

- Pre-audit planning and document review
- Scope development
- Opening and closing meetings
- Site inspections
- Record keeping.

The Independent Audit Report will be managed and written in accordance with Section 4 of this plan. This details the version control requirements, contents of the reports, review, finalisation, and submission.

3 Methodology

3.1 Pre-Audit Planning and Document review

The Independent Environmental Auditor is responsible for preparing the pre-audit documentation, which include this Audit Program and Audit Checklist. These documents will form the scope and focus of the audit and refer to the applicable Conditions of Approval.

3.2 Audit Scope

The audit scope is the following:

- The conditions of Approval as documented in Planning Consent (SSD 10378 dated 8 December 2021) including any modifications to the Planning Consent [getContent \(nsw.gov.au\)](#)
- Any items considered relevant to the audit by the Department, noting the relevant planning officer will be consulted with prior to the audit.

3.3 Audit Schedule

The audit schedule and frequency is detailed in Table 2 below. The audit schedule and audit checklist will be discussed further in the opening meeting agenda and will provide the expected audit activities.

Table 2 Audit Frequency

Project Phase	Frequency	Ongoing Independent Audit Intervals
Construction	Within 12 weeks of the commencement of construction.	Annually unless otherwise agreed with the Secretary
Operation	Within 26 weeks of the commencement of operation	No additional operational audits unless directed by the Planning Secretary

Table 3 provides details of key steps for each project phase as well as dates and personnel.

Table 3 Audit Schedule and Deliverables

Project Phase	Key steps	Frequency
Development and approval of Audit Program (This audit program)	<ul style="list-style-type: none"> - Review background documentation - Prepare the draft audit program and checklists - Discussions with Doma as required to finalise audit program 	Within four weeks of the commencement of construction.
Prepare for the on-site audit activities	<ul style="list-style-type: none"> - Prepare on site work documents - Pre audit desktop document assessment - Send out key document requests - Consult with DPE 	Prior to the audit

Project Phase	Key steps	Frequency
Initial construction audit (on site audit activities)	<ul style="list-style-type: none"> - Commence with an opening meeting - Undertake site inspection - Conduct audit by: Compliance checks on site and: Hold interviews with Contractors staff and the Department - Prepare preliminary audit conclusions - Conclude with a closing meeting 	The initial audit will be completed within 12 weeks of the notified commencement date of construction.
Prepare and distribute draft audit report	<ul style="list-style-type: none"> - Request any additional documentation - Prepare the draft audit report - Submit the audit report for review 	Within a reasonable timeframe following the audit.
Complete audit report	<ul style="list-style-type: none"> - Prepare the final audit report - Address two rounds of consolidated comments - Submit final audit report 	Within a reasonable timeframe following draft audit report to allow the opportunity for amendments.
Subsequent Construction Audits (on-site audit activities)	<ul style="list-style-type: none"> - Same as initial audit 	The subsequent audits will be undertaken within 12 months of the previous audit. Or at an alternative frequency if Directed by the Department.
Operational audit	<ul style="list-style-type: none"> - Same as initial audit 	The operational audit will be undertaken within 52 weeks of commencement of operation.

3.4 Opening and Closing meetings

Audits will commence with an opening meeting and conclude with a closing meeting. These will be attended by the Contractor representative at manager level or above, representatives from Doma Group, the auditor and audit team and any technical specialists.

The opening meeting will outline the objectives and scope of the audit, resources required and the methodology to be applied.

Verbal feedback will be provided of the preliminary audit findings to the construction contractor during the closing meeting of the audit. Written notices of non-compliances will be provided by the Independent Environmental Auditor following the audit. Any recommendations and post-audit actions will also be communicated during the closing meeting and further documented in the Audit Report.

3.5 Site inspections and audit

Site inspections will be scheduled in advance with Doma, where possible. The Independent Environmental Auditor will prepare an audit checklist that will focus on the key environmental risks, and issues identified in the RFQ for special consideration.

Interviews will be undertaken while the Independent Environmental Auditor/s are on-site. These will be undertaken with key personnel in the project delivery, including those with responsibility for environmental management.

3.6 Records

Trigalana Environmental will maintain appropriate records of site inspections, meetings and discussions and other relevant matters, making notes on the audit checklist. Trigalana Environmental will also take photographic evidence of site observations or non-compliances to support any findings or subsequent recommendations.

3.7 Evaluation of Compliance

Trigalana Environmental will utilise the audit checklist to audit all relevant conditions.

Evidence will be collected throughout the audit using the following methods as appropriate:

- Review of records, documents and reports
- Interviews and observations
- Photographs
- Site inspections

This evidence will be documented in the Audit Checklist, along with any relevant observations and notes.

The aim of the audit will be to provide both positive support for good practices, while providing practical and reasonable recommendations for improvement that can be carried over to the later stages of the project, as construction accelerates. The audit will focus on issues that are relevant to the period being audited and will exclude matters that are not relevant to the stage of works covered by the audit.

3.7.1 Status Descriptors

As outlined in Section 3.8 of the Department of Planning, Industry and Environment's Independent Audit Post Approval Requirements, the terms detailed in Table 4 below will be used to describe the compliance status of the project.

Table 4 Status Descriptors

Status	Description
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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

4 Remote Audit Techniques and Requirements

In the event the audit cannot be undertaken on site due to COVID-19 travel restrictions, the audit will be undertaken remotely.

All activities associated with the audit shall be done remotely through the use of Microsoft Teams, Skype or equivalent online communication software. This includes the opening and closing meeting, and communication and interviews with auditees throughout the audit.

Where possible, as much documented information as is practicable should be obtained prior to the audit. After the opening meeting, the auditor shall remotely connect with their auditee using or Microsoft Teams. Initial audit interviews shall take place, and where possible, the auditee is to “screen share” with the auditor. The auditor may request screen shots or copies of documents to be submitted live as the audit progresses.

Where possible, site observations shall be conducted utilising video or photo technology. These will be preferably conducted “live” however a thorough, clear and detailed recording or individual photos may be provided where a stable connection cannot be made.

5 Audit report

5.1 Version control

The Independent Audit Report will clearly include the following:

- The application number of the project
- Each version or revision number of the report
- The date on which the report was prepared and issued
- The title and name of the person who certified the Independent Audit Report.

5.2 Contents

The Independent Audit Report will include the following information:

- Introduction
- Nature of construction works on site
- Audit methodology
- Audit findings
- Details of any non-conformances
- Recommendations and/ or opportunities for improvement
- Appendices

This will be delivered in the timeframes outlined in the Audit Schedule detailed in Section 3.2 of this Audit Program.

5.3 Review and Finalisation

A draft of the Independent Audit Report will be provided to the Doma for review. This is an opportunity to provide any additional information before finalising the report.

5.4 Submission

Trigalana Environmental will submit an electronic copy of the finalised Independent Audit Report to Doma. It is noted that as per Condition C26, Doma will submit a copy of the audit report to the Planning Secretary, and any other NSW agency that requests it (within 3 months of the commencement of the audit), together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Planning Secretary