

03 May 2024

Planning Secretary
Department of Planning, Housing and Infrastructure

Waterloo Metro Quarter Southern Precinct (SSD 10437):
Condition A31 Independent Environmental Audit

Dear Planning Secretary,

This Response to Auditors Recommendations (RAR) letter has been prepared in accordance with Section 4.3.2 of the Independent Audit Post Approval Requirements (IAPAR) (NSW Planning, 2020) and to satisfy Southern Precinct SSD 10437 consent condition A31 Independent Environmental Audit.

The Planning Secretary's approved independent auditor, Josephine Heltborg, conducted the site inspection and interview on Tuesday 5 March 2024. The final Independent Environmental Audit 2 (IEA2) is submitted as a separate document. The WL Developer's response to the IEA2 audit findings is attached to this letter as Appendix A.

Yours sincerely,



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Project Director
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Appendix A – WL Developer’s Audit Response to Audit Findings

Non-Compliances

Condition Number (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent’s Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
Condition D3	Working within the construction hours.	Self-reported non-compliance – on 14/02/2024 DPHI issued a Warning Letter for a breach of Condition D3. The breach was in relation to a concrete pour extending to 6:50pm on 18/01/2024, alleging the works constituted emergency works. Two complaints were received in relation to the Out of Hours Works (OOHW). No formal action was taken.	n/a	n/a – closed by DPHI and auditor	n/a

Observations and Opportunities for Improvement

Condition Number (ID)	Compliance Requirement	Independent Audit Observation/Opportunity for Improvement	Proponent’s Proposed Action or reason to not implement measures/changes	Proposed Action Due Date (if applicable)
Condition D6	Notification to affected residents of activities undertaken outside of construction hours.	The non-notification to residents of emergency works on 18/01/2024 would technically be considered a non-compliance with Condition D6. However, as the out of hours work was self-reported to DPHI, and a breach already raised against Condition D3,	n/a – closed by auditor	n/a

		another NC has not been raised against Condition D6 in this audit.		
Condition D25	Adequate provisions must be made to collect and discharge stormwater drainage during construction of the development.	The proposed process for the management of accumulated water (i.e. diversion to SSD10438 for treatment and discharge) has not been documented in the CEMP or Soil and Water Procedure.	The WL Developer will update the CEMP and Soil and Water Procedure to make reference to the process for the management of accumulated water.	Prior to IEA3 in September 2024
Construction Framework Environmental Management Plan (CFEMP) Section 12.1	Non conformance reporting	A Non-Compliance raised by DPHI in relation to a concrete pour overrun was used as an example here (Refer Condition D3). A formal NCR was not raised in the JHG system, and associated actions were not raised after the NCR was identified.	Formal incident report to be raised with appropriate actions and close outs documented.	Prior to IEA3 in September 2024