

14 May 2026

Att: Planning Secretary – Major Projects

To Whom It May Concern,

**Re. SSD-65490715 Central Park Bradfield City Centre - Post Approval Document Submission
Condition C12 – Independent Audit Program**

Please find attached the post approval documents relating to the SSD Consent Condition C12. An extract of the relevant consent condition has been included below for reference:

INDEPENDENT AUDIT

- C12. No later than four (4) weeks before the date notified for the commencement of construction, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (NSW Department of Planning, Industry and Environment, dated May 2020) must be submitted to the Department.

The purpose of this submission is to provide a copy Independent Audit Program for the development to the Planning Secretary for their records and information.

Included in this submission are the following documents:

1. Post Approval Lodgement Checklist
2. Independent Audit Program

Yours sincerely,

Alexandra Maher
Project Engineer

FDC Construction (NSW) Pty Ltd

Attachment 1 – Post Approval Lodgement Checklist

POST APPROVAL LODGEMENT CHECKLIST

Development Consent or Project Approval No: SSD-65490715		
Project Name: Central Park Bradfield City Centre		
Applicant Name: Bradfield Development Authority (formerly Western Parkland City Authority)		
Stage: 1 (single stage)		
Item	Comment	Provided (Y/N)
Cover Letter	A covering letter must be provided which includes: - why the matter/management plans are being submitted to the Department - if relevant, the staging to which the management plan/matter applies - the condition/s under which approval is being sought.	Y
Conditions Compliance Table	A conditions compliance table must be provided which references where each relevant condition of consent (including sub-plans) has been addressed in the management plan. The conditions compliance table must be as specific as possible (i.e. Section 2.4.1 not Section 2)	Y
Evidence of Consultation	Where conditions require evidence of consultation with agencies this must be provided as an Appendix in the management plan. The management plan must include a section on how the agencies concerns have been addressed in the plan. It is important that this consultation is done prior to the management plan being submitted to the Department.	N/A
Best practice management, reasonable and feasible measures	Development consents will often require best practice management and/or all reasonable and feasible measures to prevent and/or minimise material harm to be implemented. The reviewer should be satisfied that the measures proposed meet these standards. All conditions should be considered in the preparation of the management plan. Specific construction and operating conditions must be incorporated into the management plan.	Y
Project Details	Key project description details described in the management plan must be consistent with the details in the environmental assessment and development consent.	Y
Plans/Figures	All figures and plans within the document must be legible and be in accordance with the approved plans.	Y
Management Plan Language	The management plan must be clear, concise and provide measurable outcomes. Terms such as 'may', 'plan to', 'should', 'where possible', 'attempt to implement', 'best endeavours' 'regular monitoring' are not to be used.	Y
Document control	Management plans should include an up-to-date document control register or other means of version control, noting at a minimum the date and version number so that revisions can be tracked.	Y
Reviews	If you are submitting a revised management plan, please ensure it is clear where the changes to the plan have been made, either by highlighting the relevant sections, or tracked changes.	N/A

Signature: *Alexandra Maher*

Date: 14/05/2026

Attachment 2 – Independent Audit Program

Independent Audit Program

Project Details

Project Name: Bradfield Central Park

Project Number: 250204

Project Location: 215 Badgerys Creek Road, Bringelly NSW
Bradfield City Central Park

Client: NSW Public Works

Name of principal contractor: FDC Construction (NSW) Pty Ltd

Company address: 22-24 Junction Street, Forest Lodge, 2037

ABN: 72 608 609 427

Prepared
Signature



Alexandra Maher

Project Engineer

Reviewed
Signature



Jeroen Klaassen

Project Engineer

Acknowledgement of Country

This project is being undertaken on **Dharug** land.



FDC are proud to acknowledge the Traditional Custodians of the land on which this project is located, and their connections to land, sea and community. We pay our respects to their elders past and present and extend that respect to all Aboriginal and Torres Strait Islander people and all Aboriginal and Torres Strait Islander workers on this project.

FDC Commitment

"FDC are committed to a reconciled, just and equitable Australia."
(FDC Reconciliation Action Plan)

By these acknowledgements and other actions, FDC will continue to do all we can to contribute to improving the lives and communities of our First Nations People

[illegible]

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1. Introduction

This Independent Audit Program (IAP) has been prepared in accordance with Conditions C12 to C14 of Development Consent SSD-65490715 and the Department of Planning, Housing and Infrastructure Independent Audit Post Approval Requirements (March 2026).

The purpose of this program is to establish the framework for undertaking independent audits to provide an objective assessment of compliance with the conditions of consent and the environmental performance of the development.

2. Objectives of Independent Auditing

The objectives of the Independent Audit Program are to:

- provide an independent and objective assessment of compliance with the conditions of consent;
- assess the implementation and adequacy of approved plans, strategies and programs;
- assess environmental performance relative to approval requirements; and
- identify any non-compliances and opportunities for improvement.

3. Scope of Independent Audits

The scope of each Independent Audit will be appropriate to the phase of the project being audited and will be developed in consultation with the Department.

Independent Audits will assess, as applicable:

- compliance with all conditions of consent relevant to the audit period;
- implementation of post-approval documents required by the consent;
- incidents, non-compliances and complaints occurring during the audit period;
- the status of actions arising from previous Independent Audits; and
- the environmental performance of the development.

The level of detail and depth of each audit will be proportionate to the scale, nature and environmental risk profile of the works being undertaken during the relevant audit period.

4. Audit Timing and Frequency

Independent audits will be undertaken in accordance with Conditions C12 to C14 of the development consent and the Independent Audit Post Approval Requirements (March 2026).

4.1 Construction Phase

An initial independent audit will be undertaken within the required timeframe following commencement of construction. Ongoing independent audits during construction will be undertaken at intervals no greater than those specified by the Department, unless otherwise agreed to by the Planning Secretary in writing.

4.2 Operation Phase

An initial independent audit will be undertaken within the required timeframe following commencement of operation. Ongoing operational audits will be undertaken at intervals no greater than those specified by the Department, unless otherwise agreed to by the Planning Secretary.

Where appropriate, the Applicant may seek the Planning Secretary's agreement to vary audit timing or to combine audits, having regard to project staging, activities being undertaken and the risk profile of the works.

4.3 Indicative Independent Audit Timing and Frequency

Project Phase	Audit Type	Timing	Ongoing Frequency
Construction	Initial Independent Audit	Within the timeframe required following the commencement of construction	N/A
Construction	Ongoing Independent Audits	Following completion of the initial audit	At intervals no greater than those specified by the department, unless otherwise agreed (e.g. 6 months)
Operation	Initial Independent Audit	Within the timeframe required following the commencement of operation	N/A
Operation	Ongoing Independent Audits	Following completion of the initial audit	At intervals no greater than those specified by the Department, unless otherwise agreed.

5. Independent Auditor and Audit Team

Independent audits will be undertaken by a suitably qualified, experienced and independent Lead Auditor who is endorsed in writing by the Planning Secretary prior to the audit (or, where agreed, for the duration of the construction phase). The Lead Auditor may be supported by additional auditors and/or technical specialists where required by the consent or the nature of the audit, subject to the Planning Secretary's agreement. All audit team members will meet the competence and independence requirements set out in the Independent Audit Post Approval Requirements, including the provision of pre-audit declarations of independence.

5.1 Roles and Responsibilities for Independent Auditing

Role	Organisation	Responsibility
Applicant	FDC Construction (NSW)	Facilitate Audits, Provide Access and Information, Respond to Audit Findings
Lead Auditor	TBC	Conduct Independent Audits, Assess Compliance, Prepare Audit Reports
Technical Specialists (if required)	TBC	Provide specialist input to support the audit, as required.
Department	DPHI	Agree to auditor appointment, review audit reports and responses

6. Audit Methodology

Each Independent Audit will be undertaken in accordance with the Independent Audit Post Approval Requirements (March 2026) and may include review of relevant documentation, site inspections, interviews with relevant project personnel and evidence-based evaluation of compliance. Audits may be undertaken with reference to AS/NZS ISO 19011:2019 – Guidelines for Auditing Management Systems, as appropriate.

6.1 Audit Methodology Process



6.2 Compliance Status Descriptors

Compliance status will be assigned using only the approved descriptors: Compliant, Non-Compliant or Not Triggered. No alternative compliance descriptors will be used.

Compliance Status	Description
Compliant	Sufficient verifiable evidence demonstrates all elements of the requirement have been met
Non-Compliant	One or more elements of the requirement have not been complied with
Not Triggered	The requirement has not been activated during the audit period

7. Audit Reporting

An Independent Audit Report will be prepared for each audit in accordance with the Independent Audit Post Approval Requirements and will include audit scope and methodology, audit findings and compliance assessment, details of any non-compliances, recommendations and opportunities for improvement, and supporting evidence and required appendices.

8. Proponent Review and Response

The Applicant will review the draft Independent Audit Report and prepare a formal response to all audit findings and recommendations. The final Independent Audit Report and the Applicant's response will be submitted to the Department within the required timeframe and made publicly available in accordance with Condition C14 of the consent.

9. Review of the Independent Audit Program

This Independent Audit Program may be reviewed and updated where required as a result of approved modifications to the development, directions from the Planning Secretary, or outcomes of Independent Audits.