

24 November 2025

Julia Pope
Team Leader Compliance - Metro
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124
(submitted via the Major Projects Portal)

cc: Ventura Building Surveyors

**Re: Gosford Alive, 136-146 and 148 Donnison Street, Gosford - SSD-9813
Independent Environmental Audit – Audit Program (Updated)**

Dear Julia,

Bathla Group has developed an Audit Program, as outlined below, to address the requirements for Independent Environmental Audit of SSD-9813, in particular Conditions C51 to C53. Requirements for Independent Environmental Audit as per SSD-9813 are as follows:

Independent Environmental Audit

C51. Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an Independent Audit Program or commencement of an Independent Audit.

C52. Prior to the commencement of demolition, an Independent Audit Program prepared in accordance with the Independent Audit Post Approval Requirements (Department 2018) must be submitted to the Planning Secretary and the Certifier.

C53. Table 1 of the Independent Audit Post Approval Requirements (Department 2018) is amended so that the frequency of audits required in the demolition and works phase is:

(a) An initial demolition and works Independent Audit must be undertaken within eight weeks of the notified commencement date of construction; and

(b) A subsequent demolition and works Audit must be undertaken no later than six months from the date of the initial Independent Audit.

In all other respects Table 1 remains the same. 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 to the applicant of the date upon which the audit must be commenced.

C54. Independent Audits of the development must be carried out in accordance with:

(a) the Independent Audit Program submitted to the Planning Secretary and the Certifier under condition C52 of this consent; and

(b) the requirements for an Independent Audit Methodology and Independent Audit Report in the Independent Audit Post Approval Requirements (Department 2018).

C55. In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2018), the Applicant must:

(a) review and respond to each Independent Audit Report prepared under Condition C54 of this consent;

(b) submit the response to the Planning Secretary and the Certifier; and

(c) make each Independent Audit Report and response to it publicly available 60 days after submission to the Planning Secretary and notify the Planning Secretary and the Certifier in writing at least seven days before this is done.

C56. Notwithstanding the requirements of the Independent Audit Post Approval Requirements (Department 2018), the Planning Secretary may approve a request for ongoing annual operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.

Note: In preparing this Audit Program, Bathla has referenced the current (May 2020) version of *Independent Audit Post Approval Requirements (Department 2020, the IPARs)*.

Independent Audit Program

In accordance with Condition C51 of Part C of the Development Consent SSD-9813, proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the preparation of an Independent Audit Program or commencement of an Independent Audit. The Department provided approval to the Audit Team in correspondence to Bathla dated 10 July 2025, prior to development of this Audit Program (ref: *IEA Auditor Endorsement - Donnison Street, Gosford (Gosford Alive) - SSD 9813*; NSW Planning ref: SSD-9813-PA-8). Therefore, Condition C51 is complied with.

In accordance with Condition C52 of Part C of the Development Consent SSD-9813, Bathla are required to develop an Independent Audit Program (this program) prior to the commencement of demolition and submit this program to the Planning Secretary and Certifier. Bathla notified the Department of the commencement of construction on 10 September 2025.

It is important to note that demolition has not progressed as planned and that limited works have occurred at the site. Due to Environmental Constraints, Unforeseen Site Conditions and Christmas Closure, Bathla is in the process of implementing an extension to the demolition program. As such Bathla provides this updated Independent Audit Program to address the requirements of Condition C51-C53.

The site inspection was completed on **5 November 2025** by the Lead Auditor. To facilitate the proposed extension, timing for a follow-up site inspection by the Lead Auditor is proposed by **30 January 2026**. The independent audit report and response will be submitted to the Department by **30 March 2026**.

Required timing and frequency for Independent Audits are established by Condition C53 and Table 1 of the IPARs, as outlined in Table 1 below:

Table 1: Independent Audit Timing for SSD-9813

| Phase | Initial Independent Audit | Ongoing Independent Audit Intervals |
|--------------------------|---|---|
| Construction | <p>Within eight weeks of the notified commencement date of construction.</p> <p>The timing for the initial independent audit is 10 November 2025. The site inspection will be completed on or prior to this date.</p> <p>The timing for the follow-up site inspection is 30 January 2026.</p> <p>The independent audit report and response will be submitted to the Department by 30 March 2026.</p> | <p>Subsequent audit: A subsequent demolition and works Audit must be undertaken no later than six months from the date of the initial Independent Audit.</p> <p>The time for ongoing independent audits is 30 July 2026 and 29 January 2027. The site inspections will be completed on or prior to this date.</p> <p>The independent audit report and response will be submitted to the Department by 30 September 2026 and 29 March 2027 or within 2 months of the site inspection).</p> |
| Operation | <p>Within 26 weeks of the commencement of operation.</p> | <p>At intervals, no greater than 3 years or as otherwise agreed by the Secretary.</p> |
| Closure / Rehabilitation | <p>Within 52 weeks from notifying of suspension/ceasing of operations.</p> | <p>At intervals no greater than 1 year or as otherwise agreed by the Secretary.</p> |

In accordance with Condition C53 and the IPARs, it is noted that:

- The timeframes for the frequency of audits required for the demolition and works phase is amended as per Condition C53. In all other respects Table 1 remains the same.
- 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 to the applicant of the date upon which the audit must be commenced.
- The timeframes in Table 1 include completion of all activities required in undertaking an Independent Audit.
- Submission of the Independent Audit Report and the proponent's response to the audit findings is required to be submitted to the Department no later than 2 months of undertaking the independent audit site inspection in accordance with the frequency in Table 1 or as otherwise outlined in the project's conditions of consent.

Additionally, Bathla will ensure the audits are conducted in accordance with Condition C54 and C55 of SSD-9813 being, Bathla will:

- Ensure the Independent Audits of the development are carried out in accordance with this Independent Audit Program and the requirements for an Independent Audit Methodology and Independent Audit Report in the IPARs.
- Review and respond to each Independent Audit Report prepared under Condition C54 of SSD-9813.
- Submit the response to the Planning Secretary and the Certifier.

- Make each Independent Audit Report and response to it publicly available 60 days after submission to the Planning Secretary
- Notify the Planning Secretary and the Certifier in writing at least seven days before each Independent Audit Report and response is made publicly available.

We look forward to the Department's acceptance of the above Audit Program.

Should you have any questions or wish to discuss this proposed Audit Program, please contact me as below.

Yours sincerely,

Name: Angelica Wu

Position: Senior Project Design Manager

Signature: 