



By email: chris.koukoutaris@frasersproperty.com.au

24 August 2020

Dear Chris

**Audit Program
Ivanhoe Estate Stage 1 SSD-8903-PA-2**

I refer to recent correspondence submitted by Frasers Property Australia (SSD-8903-PA-2) informing the Department as required by condition B5 of SSD-8903 that Environmental Earth Sciences NSW (**auditor**) has been engaged to conduct a program of independent environmental auditing of Stage 1 Ivanhoe Estate SSD-8903. It is noted that the audit program consists of the initial independent environmental audit of Stage 1 in October / November 2020 followed by an annual audit.

Please note that the Independent Audit must be lead by a suitably qualified auditor and be prepared, undertaken and finalised in accordance with the requirements of Conditions B8 and B9 of SSD 8903. The Department also requests that consideration be given to the *Compliance Reporting Post Approval Requirements May 2020 (PAR 2020)* to the extent that it does not contradict Conditions B8 and B9 of SSD 8903. Failure to meet these requirements will require revision and resubmission. The PAR 2020 may be accessed at <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/compliance-reporting-post-approval-requirements-2020-05-19.pdf>

Please append this correspondence to the Independent Audit Report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Pope'.

Julia Pope
Team Leader Compliance - Metro
As nominee of the Secretary



The Program Director
NSW Land and Housing Corporation
219-241 CLEVELAND STREET
REDFREN NSW 2016

Email: richard.wood@facns.nsw.gov.au

10/11/2021

Attention: Richard Wood

**Ivanhoe Estate Stage 1 (SSD-8903)
Independent Environmental Audit**

Reference is made to the revised Independent Environmental Audit (**IEA**) report and Response to Audit Recommendations (**RAR**) for the Ivanhoe Estate Stage 1, prepared as required by Schedule 2, Part B, Condition B9 of SSD 8903, as modified (the **Consent**) and submitted to the Department of Planning, Industry and Environment (the **Department**) on 5 October 2021.

The Department notes that there were no non-compliances or incidents reported in this IEA. Please note that acknowledgement of this report is not endorsement of the compliance status of the project.

As detailed in the Department's letter dated 14 September 2021, you are reminded that all future IEAs are to comply with the requirements of the *Independent Audit Post Approval Requirements* dated May 2020 (**IAPAR 2020**) to the extent that they do not contradict the requirements of Conditions B8 and B9 of the Consent. The IAPAR 2020 is available on the Department's website.

Please include a status update for all actions provided in the RAR in the next Annual Review / IEA Report, until all actions are completed.

If you wish to discuss the matter further, please contact Maria Divis on 02 8275 1156 or by email to Maria.Divis@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Julia Pope'.

Julia Pope

Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary



The Program Director
NSW Land and Housing Corporation
219-241 CLEVELAND STREET
REDFREN NSW 2016

Email: richard.wood@facns.nsw.gov.au

17/09/2021

Attention: Richard Wood

Ivanhoe Estate Stage 1 (SSD-8903) Independent Environmental Audit

Reference is made to the Independent Environmental Audit (IEA) report for the Ivanhoe Estate Stage 1, prepared as required by Schedule 2, Part B, Condition B9 of SSD 8903, as modified (**Consent**) and submitted to the Department of Planning, Industry and Environment (**Department**) on 13 September 2021.

The Department has reviewed the submitted IEA Report and considers more information is required to satisfy the requirements of the Consent in relation to the IEA.

In accordance with Schedule 2, Part A, Condition A3 please amend the IEA Report, and submit track changes and clean copy versions to the Department via the Major Project's portal against the Consent (also email a copy to Maria.Divis@planning.nsw.gov.au), with the following additional information by **Friday 8 October 2021**:

1. The IEA Report notes that the audit was undertaken to satisfy the requirements of the Independent Audit Post Approval Requirements 2018 (**IAPARs**). It is requested that you update the report to meet the requirements of the IAPARs 2018:
 - a. Independent Audits must not commence until the proposed auditor has been agreed in writing by the Planning Secretary. The document agreeing to the auditor must be appended to the IEA Report. Please provide a copy of this document as an appendix to the IEA Report.
 - b. The auditor must consult with the Department, and other agencies and stakeholders to obtain their input into the scope of the audit. Provide full copies of consultation with relevant agencies as an appendix to the IEA Report.
2. In accordance with Schedule 2, Part B, Condition B8 of the Consent, the IEA must:
 - a. Review the performance of the development against the conditions of the Consent and other licences and approvals relating to this development. Section

1.1 of the IEA Report states that the report was prepared in accordance with SSD 8903 MOD 1. The IEA Report must be updated to assess the development against all Consent Modifications (Modifications 1 and 2), as well as any other licences or approvals that relate to this development.

- b. Assess whether the development is complying with the terms of this consent. Appendix A, Table B of the IEA Report must be updated to provide an assessment of compliance with all of the conditions of consent applicable to the current phase of development that is being audited, to address all requirements of Section 3.3, Part 1 of the IAPARs.
- c. Assess the environmental performance of the development, and its effects on the surrounding environment including the community. The review of environmental Performance of the development must be updated to address all requirements of the Section 3.3, Part 2 of the IAPARs.

3. In accordance with Schedule 2, Part B, Condition B9 of the Consent, the IEA must include:

- a. A Response to Audit Recommendations (**RAR**), that is to be submitted with the revised IEA Report and is to address each item referenced in Section 4.2 of the IEA Report, as well as each of the independent audit comments and recommendations noted in Table A and Table B of the IEA Report. The responses to audit findings must clearly set out the proponent's responses to each of the audit findings including:
 - In relation to non-compliances, the proponent's response must set out the actions and the completion timing (dd/mm/yyyy) of such actions that are to be taken in response to each non-compliance.
 - In relation to observations and opportunities identified for improvement, the proponent must provide reasons if they propose not to implement any measures or make any changes in response.

It is requested that you include a status update for all actions provided in the RAR in the next IEA Report, until all actions are completed.

4. It is requested that the revised submission exclude details contained in and after *Appendix C: Technical Specialist Reports* of the report due to the size of the document. Should the revised submission contain new details in this section of the report, please submit a copy of the new details only, as a separate appendix.

Condition A3, Schedule 2

Condition A3, Schedule 2 of the Consent states that the Planning Secretary may make written directions to the Proponent in relation to the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this Consent, including those that are required to be, and have been approved by the Planning Secretary; and the implementation of any actions or measures contained in such document.

Direction

In all future IEAs, as a delegate of the Planning Secretary, I direct the NSW Land and Housing Corporate to comply with the requirements of the *Independent Audit Post Approval Requirements* dated May 2020 (**IAPAR 2020**) to the extent that they do not contradict the requirements of Conditions B8 and B9 of the Consent. The IPAR 2020 is available on the Department's website.

Non-compliances identified in the IEA will be assessed in accordance with the Department's Compliance Policy. Further correspondence may be sent in relation to the identified non-compliances.

If you wish to discuss the matter further, please contact Maria Divis on 02 8275 1156.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Pope', is positioned above the typed name and title.

Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary