



HBI

Healthy Buildings International

INDEPENDENT AUDIT NO. 1 AUDIT REPORT

Luddenham Resource Recovery Facility (LRRF)

SSD 10446

July 2025

Authorisation

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EXECUTIVE SUMMARY

This report presents the findings of the Independent Audit conducted by Healthy Buildings International Pty Ltd (HBI) commencing with a site inspection on Wednesday 9th July 2025 for Luddenham Resource Recovery Facility (LRRF) Project, State Significant Development (SSD) 10446.

This audit is the first Independent Audit conducted for the LRRF project; the temporal period covered by the audit is between the date of commencement of construction on 1st May 2025 to the date of the site inspection for this Independent Audit 1 (IA1) on 9th July 2025. The environmental performance of the project was assessed at the time of the site inspection on 9th July 2025.

The purpose of this audit was to undertake the necessary assessment and review of compliance with SSD 10446 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Construction Environmental Management Plan (CEMP) and Sub-plans. Specifically, this audit was required to satisfy Condition C17 of SSD 10446 which requires Independent Audits of the SSD to be carried out in accordance with the Independent Audit Post Approval Requirements (IAPARs) dated May 2020 (DPIE, 2020).

In summary, a total of **176 conditions** were assessed, **zero non-compliance** were identified, and **two observations** were identified.

Overall, the Auditees demonstrated a high level of compliance with the Project Consent and associated post-approval documents (management plans, procedures, strategies and construction monitoring programs) that formed a part of the Audit Scope. The level of implementation of these requirements on site was also observed as high.

The Auditors would like to thank the Auditees from Coombes Property Group and Texco Construction for their organisation, cooperation and support during the audit.



1. INTRODUCTION

This report presents the findings of the Independent Audit conducted by Healthy Buildings International Pty Ltd (HBI) commencing with a site inspection on Wednesday 9th July 2025 for Luddenham Resource Recovery Facility (LRRF) Project, State Significant Development (SSD) 10446. This audit is the first Independent Audit conducted for the LRRF project and has been conducted in accordance with the Independent Audit Post Approval Requirements (IAPARs) dated May 2020 (DPIE, 2020).

1.1 The Project

1.1.1 Overview

The Luddenham Resource Recovery Facility comprises construction of a facility at 275 Adams Road, Luddenham (Lot 3 DP 623799) designed to receive and process up to 600,000 tonnes per annum (TPA) of non-putrescible general solid waste. This waste stream includes building and demolition waste and commercial and industrial waste, all of which will be recycled. The broader site at 275 Adams Road is an existing shale and clay quarry site of approximately 19 hectares (ha), which is currently undergoing some rehabilitation by the same contractor that is constructing the LRRF (Texco Construction), with site compound and carpark areas within the infrastructure footprint of the quarry. The approved development footprint for LRRF is approximately three hectares of the total site area.

The LRRF will operate under an Environment Protection Licence (EPL 21981) for resource recovery and waste storage. The facility will be permitted to receive general solid waste (non-putrescible), comprised of construction and demolition waste and commercial and industrial waste for recycling as value-added materials and intends to achieve a recovery rate of 85% from processing incoming materials.

The Environmental Impact Statement (EIS) was prepared and finalised in July 2020 to assess the impacts of construction and operation of the project and was placed on public exhibition between Thursday 30 July 2020 and Wednesday 26 August 2020. A Response to Submissions Report was prepared and finalised in May 2021.

The Minister for Planning and Public Spaces approved the LRRF under section 4.5 (1) of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Project was declared State Significant Development (SSD) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and clause 23(3) of Schedule 1 of the *SRD SEPP (State Environmental Planning Policy (State and Regional Development) 2011* on 13 August 2024. The consent incorporated the Minister's Conditions of Consent (CoA) (SSD-10446).

Key features of the Luddenham Resource Recovery Facility (LRRF) project are shown in Figure 1 and include:

- Sealed driveway access from Adams Road.
- Internal sealed roads.
- Hard surfacing for the warehouse floor and external areas.
- An approx. 13,000 m² metal clad fully enclosed warehouse, with an elevation of 16 m.



- Two site offices with the larger office located in the outside parking area and the smaller office located over the car parking area on the western side of the LRRF warehouse.
- Surface water drainage system.
- A stormwater management system, including rainwater tanks and an onsite detention basin.
- An on-site surface water management system consisting of a water treatment plant, onsite leachate and water detention areas.
- An on-site wastewater management system comprising a septic tank.
- Connection to services.
- Fencing and signage at the front of the site.
- Landscaping



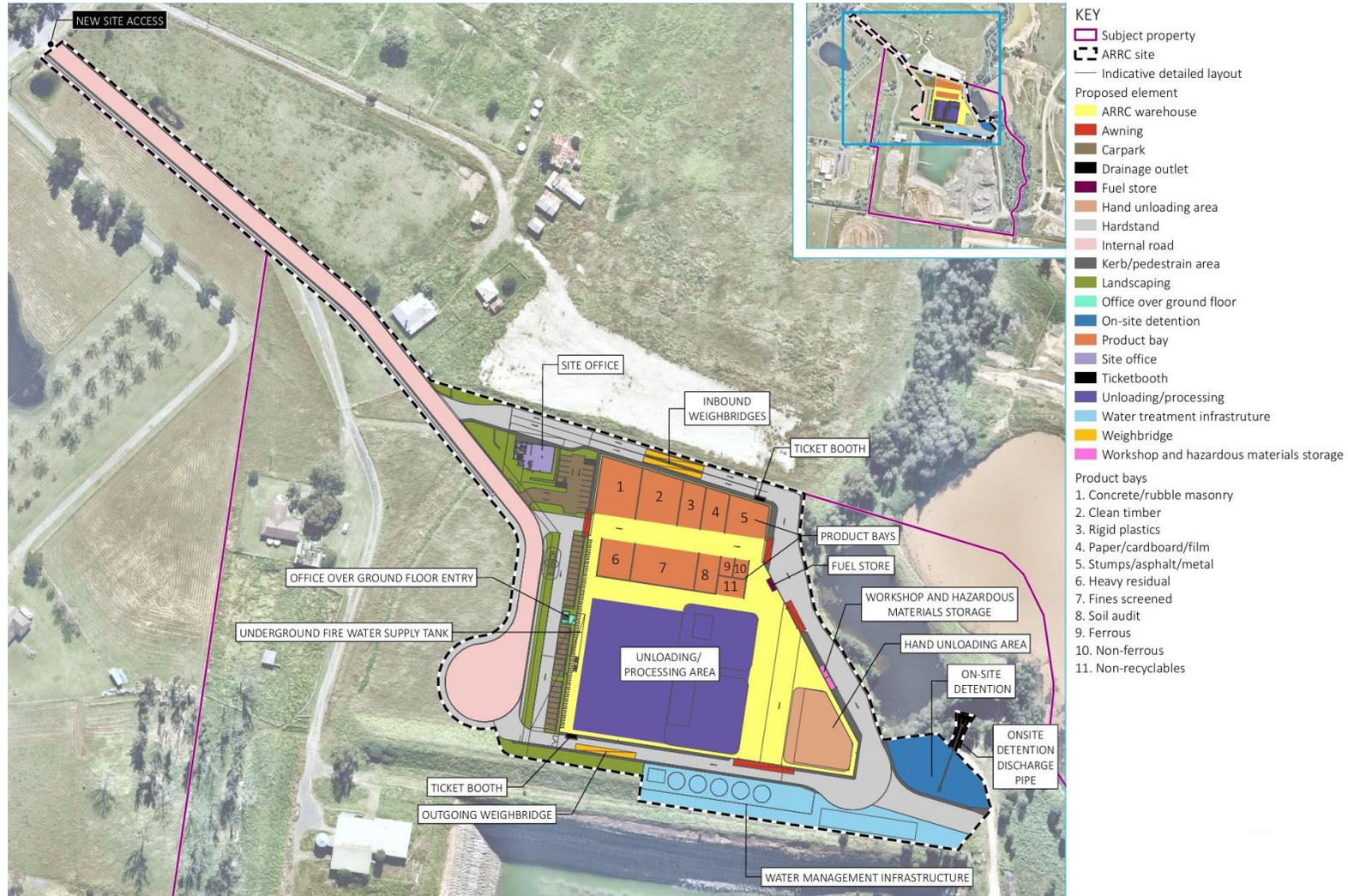


Figure 1: Key Features of the LRRF Project (Source: RtS, Chapter 1)

1.1.2 Changes to the Project

The following section describes any approved changes to the project since the time of the planning consent (SSD 10446), noting below modifications are outside this audit period.

Modifications

There have been nil modifications to SSD 10446

Consistency Assessments

Nil Consistency Assessment have been prepared.

1.1.3 Project Staging

There has been no Staging proposed to date under the provisions of Condition of Consent A19 of the SSD 10446 planning consent.

1.1.4 Activities undertaken during the audit period

The IA1 audit period is from the date of commencement of Construction (1 May 2025) to the date of the site inspection for this IA1 (9 July 2025). The audit was undertaken in accordance with the 3 month independent audit frequency required for the first audit the IAPARs. The following activities were conducted during the audit period:

- Site establishment
- Clearing and grubbing
- Establishment of environmental controls, including erosion and sediment controls
- Bulk Earthworks
- Construction of building pad
- Internal road construction commenced - subgrade
- Footing FRP and blinding pours
- Stormwater system installation commenced



1.2 Audit team

In accordance with Condition of Consent (CoA) C17 (b) of SSD 10446, and Section 3.1 of the Independent Audit Post Approval Requirements (IAPAR), independent audits must only be undertaken by a suitably qualified, experienced and independent auditor; the appointment of the auditor agreed in writing by the Planning Secretary before each audit is commissioned.

Endorsement of the audit team was provided by the NSW Department of Planning, Housing and Infrastructure (DPHI) on 6 May 2025 and applies to all Construction audits and the initial Operational audit. The endorsement is presented in **Appendix B**. Table 1 presents the audit team endorsed for the Project, and the Lead Auditor’s declaration for this first Independent Audit is presented in **Appendix E**.

Table 1 Audit Team

Name & Position	Company	Audit Role	Certification
Rui Henriques	Healthy Buildings International Pty Ltd (HBI)	Lead Auditor	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-486435)
Swathi Gowda	Healthy Buildings International Pty Ltd (HBI)	Alternate Lead Auditor	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-442234)

1.3 Audit objectives

The objective of this Independent Audit is to satisfy SSD 10446 Condition C17, which states:

The Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the Development. Audits must:

- (a) *be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020).*

This first Independent Audit aims to meet the minimum requirements of the Independent Audit Post Approval Requirements (IAPARs), which sets out the audit methodology and reporting requirements for the Independent Audit.

- (c) *be documented in an Independent Audit Report and submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary)*

In order to meet the above, including the Audit delivery program and schedule; the site inspection and audit were conducted on 9 July 2025.



1.4 Audit scope

The Independent Audit comprises of four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance and Reporting. IA1 covers the period from 1 May 2025 to the 9 July 2025 (the 'audit period').

The scope of the Independent Audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- An assessment of compliance with SSD 10446 Schedule 2, Parts A, B, C, and Appendix A;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

The audit commenced with a site inspection on 9 July 2025 and pertains to post-approval requirements and compliance during Construction of the LRRF (commencement of construction 1 May 2025).



2. AUDIT METHODOLOGY

The Independent Audit was conducted in a manner consistent with below reference documents and evidence submitted for review during the audit:

- Independent Audit Post Approval Requirements (NSW DPIE, May 2020)
- ISO 14001: 2015 Environmental Management Systems
- AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems

2.1 Audit planning and scope development

The auditee organisations (together referred to as the Auditee/s or Project team) were identified as follows:

- The Proponent: Coombes Property Group (Coombes)
- The LRRF Contractor: Texco Construction (Texco).

Personnel representing the Auditees are identified in Table 2 below. Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditees
- Confirm the DPHI approved audit team
- Confirm the audit objectives, scope, audit period and indicative audit program
- Consult with DPHI on the audit scope.

The Lead Auditor consulted with DPHI on 23 May 2025 to obtain input on the scope of the Independent Audit in accordance with Section 3.2 of the IAPARs. DPHI responded on 12 June 2025 (Telephone communication with Mr Dan Couriel) confirming that there are no additions to the audit scope outlined in the Auditor's letter dated 23 May 2025.

A summary of the key issues and areas of focus raised by stakeholders during consultation is presented in **Table 2**.

Consultation is also discussed in Section 3.6 and consultation records are presented in **Appendix D**.



Table 2: Key issues and areas of focus raised during stakeholder consultation

Stakeholder Consulted	Key Issues and Areas of Focus	Where addressed
Department of Planning Housing and Infrastructure (DPHI)	Scope consultation correspondence issued to DPHI on 23 May 2025. DPHI responded on 12 June 2025 (Telephone communication with Mr Dan Couriel) confirming that DPHI has no additions to the audit scope outlined in the Auditor’s letter dated 23 May 2025.	<p>This audit was conducted in accordance with CoA C17 and the IAPAR.</p> <p>Assessment of compliance with SSD 10446 Conditions, as applicable (as noted in Section 1.4). Refer Audit Table within Appendix A.</p> <p>Environmental performance assessment (including but not limited to actual versus predicted impacts) is included in Sections 3.8 and 3.9.</p> <p>A high-level assessment of the environmental management plans and sub- plans is included in Sections 3.3.</p>
Environmental Representative (ER)	ER Audit Interview conducted on 7 July 2025 (Teams Meeting) to discuss any key issues or areas of concern. The ER did not raise any particular areas of concern, or issues they would like included in the scope of the audit.	Not Applicable.

The Lead Auditor performed a document review, prepared an Audit Plan with an indicative program and prepared an Audit Table (refer **Appendix A**) for this Independent Audit. The proposed audit plan (refer **Appendix C**) was provided to Coombes on 25 June 2025 for distribution to the Auditees, in preparation for the Independent Audit.

2.2 Auditees

Table 3 outlines key Auditees and other personnel involved in the audit.



Table 3: Auditees and key personnel

Organisation	Position Title	Name	Involvement
Coombes Property Group	General Manager - Development	Pascal Bobillier	Closing meeting
Coombes Property Group	Environmental & Planning Manager	Elena Ivanova	Opening & closing meetings, site inspection, interviews and evidence verification, post-audit provision of evidence
Texco Construction	Project Director	Tom McCreanor	Opening meeting, site inspection, interviews and evidence verification
Texco Construction	Senior Contracts Administrator	Vinesh Rao	Opening & closing meetings, site inspection, interviews and evidence verification, post-audit provision of evidence
Texco Construction	Site Manager	Peter Free	Opening meeting, site inspection, interview and evidence verification (part of)
Trigalana Environmental Pty Ltd	Environmental Representative	Richard Peterson	Interview



2.3 Site Inspection and Meetings

The site inspection, opening and closing meetings were held with Project personnel as identified in Table 3.

A site inspection was conducted as part of this first Independent Audit, to assess compliance and validate implementation of the following:

- Mitigation measures and controls in the nominated management plans and associated documents (within this first Independent Audit scope and as outlined in the Audit Table in Appendix A);
- Effectiveness of environmental controls; and
- To further verify responses provided by the Auditees.

The site inspection was conducted on 9 July 2025 and covered the complete construction area illustrated in Figure 1.

Site inspection photos, observations and notes are presented in **Section 5**.

The opening meeting was held onsite at 275 Adams Road, Luddenham on 9 July 2025. During the opening meeting, the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed.

A closing meeting was held remotely (via Teams) with Coombes and Texco on 29 July 2025. At the closing meeting, preliminary audit findings were presented, including a summary of preliminary Non-compliances, Observations and Recommendations.

Attendance records for the site inspections, opening and closing meetings are presented in **Appendix C**.

2.4 Interviews and verification of evidence

The Independent Audit included the review of publicly available and requested documents, records and registers to evaluate compliance. Interviews with key project personnel were conducted and further documentary evidence was also sought to verify responses provided by Auditees.

Refer to Section 2.2 for details on the personnel interviewed. Audit interviews and verification of evidence sessions were conducted with the Auditees as follows:

- Environmental Representative: 7 July 2025
- Coombes and Texco: 9 July 2025.

In addition to the above, the Lead Auditor requested copies of evidence discussed/nominated, to obtain evidence that, due to time constraints, was not adequately inspected during the audit interviews. These requests were provided promptly by the Auditees within required timeframes.



2.5 Generating audit findings

Independent Audit findings were based on verifiable evidence collected and reviewed. The evidence included:

- Correspondence from DPPI and other stakeholders
- Records, documents and specialist reports
- Interviews with relevant personnel
- Figures, plans and photographs
- Site inspections
- Monitoring data and analysis
- Other applicable approvals, permits or Project-specific environmental requirements (as documented within the Audit Table in **Appendix A**)

2.6 Compliance evaluation

The Auditors determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the IAPAR, as listed in Table 4, below:

Table 4: Compliance descriptors from Table 2 of the IAPAR

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.

Observations and notes have also been made to provide context, and/or identify any opportunities for improvement. This includes positive observations where the project has applied initiatives beyond compliance requirements.

The compliance status has been attained by assessing a representative sample of documents, records and data for each requirement in the audit period prescribed. Observations on-site during the audit site inspections are based on current activities and assumed to be representative of Texco and Coombes performance across the Project.

2.6.1 Evaluation of post audit approval documentation

The Lead Auditor assessed whether post approval documents:

- were developed in accordance with the conditions of consent and approvals applicable to the Project (if any) and their content is adequate; and



- have been implemented in accordance with the conditions of consent for the Project.

The adequacy of post approval documents was determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document; or
- whether there are any opportunities for improvement.

2.6.2 Completing the audit

The Draft Independent Audit Report was distributed to the Auditees for review to ensure content is factual and representative. Audit findings have been determined independent of the Auditees, DPHI and any other parties, and based on the evidence assessed during the audit.



3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

Key documentation reviewed during the audit is listed below. A more comprehensive list of documents and evidence sighted in relation to each Condition of Consent is detailed within the Audit Table (**Appendix A**).

- Luddenham Advanced Resource Recovery Centre Environmental Impact Statement (LARRC EIS), dated July 2020) (the EIS)
- Luddenham Advanced Resource Recovery Centre Submissions Report (RtS), dated May 2021
- LRRF Conditions of Consent (SSD-10446), determined 13 August 2024
- LRRF State Significant Development Assessment Report (SSD-10446), August 2024
- Project website: <https://luddenhamrecycling.com.au>
- LRRF ER Inspection Report, dated 06/05/2025
- LRRF ER Inspection Report, dated 20/05/2025
- LRRF ER Inspection Report, dated 03/06/2025
- LRRF ER Inspection Report, dated 17/06/2025
- LRRF Construction Environmental Management Plan (Rev 5, March 2025)
- LRRF Construction Noise and Vibration Management Plan (Rev 4, March 2025)
- LRRF Construction Transport, Traffic and Access Management (Rev 6, March 2025)
- LRRF Construction Erosion and Sediment Control Plan (Rev 0, November 2024)
- LRRF Construction Waste Management Plan (Rev 3, March 2025)
- LRRF Community Consultation Plan (Rev 3, March 2025)
- LRRF Biodiversity Management Plan (Rev R5, March 2025)
- LRRF Aboriginal Cultural Heritage Management Plan (Rev 4, March 2025)
- LRRF Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25
- NSW Planning, email "Construction certificate (CFT-684942) for 275 Adams Road Luddenham 2745: Application has been determined" dated 28/4/25
- LRRF Complaints Register to June 2025



3.2 Non-compliances, Observations and Actions

This Section presents findings from the first Independent Audit (IA1). A summary of the number of conditions assessed and compliance status from IA1 is presented in Table 5. An overview of each finding and recommendation is presented in Table 6.

The Audit Table is provided in **Appendix A** and includes details of the evidence collected, observed and provided support of compliance with the audit criteria.

Table 5: Summary of conditions assessed and compliance status – IA1

Part of the Project Approval	No. of Conditions assessed	Compliance Status			
		Compliant	Non-Compliant	Not Triggered	Observations
Part A	45	21	0	24	0
Part B	111	40	0	71	1
Part C	20	7	0	13	1
Total	176	68	0	108	2

In summary, a total of **176 conditions** were assessed. **zero non-compliances** and **two observations** were identified.

A summary of findings from IA1 has been presented in **Table 6**.

As this is the first audit there are no findings from previous Independent Audits.



Table 6: Findings – IA1 (9 July 2025)

Item	Ref	Type	Requirement	Finding	Recommended or completed action By Whom and by When	Status
IA1-OFI01	B58	Observation	<p>The Applicant must maintain the erosion and sediment control measures installed on the site in accordance with condition B57 for the duration of construction and any other surface disturbance for the Development.</p> <p>Condition B57 states:</p> <p>Prior to the commencement of any construction or other surface disturbance for the Development, the Applicant must install suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline and the Erosion and Sediment Control Plan (ESCP) included in the CEMP required by condition C2.</p>	<p>IA1 - Audit Finding</p> <p>Consistent with the requirements of Landcom 2004 the ESCP states that "Overflows from the construction sediment basin to drain via large diameter sub-soil pipes installed under the access road, a reinforced concrete causeway, etc. The spillway arrangements and drainage path alignment to be determined on site." However, sediment basin overflow provisions consistent with the ESCP were not observed at the audit site inspection.</p>	<p>The Auditor recommends that, that Texco construct a suitable means of drainage of overflow in over-design events in accordance with the ESCP or Landcom 2004 (e.g. standard drawing SD 6-4 or equivalent) that minimises erosion and sediment transport to waterways during such events, and the ESCP should be updated as appropriate. Note that updates to the ESCP must continue to meet the requirements of Landcom 2004 for ESCPs (Sections 2.1 and 2.2).</p> <p>Since the audit site inspection, the project took the following actions in response:</p> <ul style="list-style-type: none"> Engaged Rubicon Enviro Pty Ltd (Rubicon) to review site erosion and sediment controls Installed an emergency spillway on the northern side of the basin On 23 July a Rubicon CPESC (Mr Andrew Littlewood – Senior Soil Conservationist - CPESC No. 5988 & CESSWI No. 12101) inspected the site In relation to the subject basin, the subsequent site inspection report prepared by the CPESC (Rubicon, 28/7/25) states; "We note that adjacent stormwater systems are now connected to the OSD basin. In addition, an emergency spillway was recently formed which will discharge spill flows to the adjacent Pond 2. The newly installed spillway is well constructed with plastic underlay and pinned geotextile with sediment fence installed along the spillway verges. The controls in the area remain functional, and no actions were required." <p>Based on the above reported actions the Auditor considers the finding has been adequately closed.</p>	Closed
IA1-OFI02	C20	Observation	<p>At least 48 hours before the commencement of construction of the Development and for the life of the Development (or such other time as agreed by the Planning Secretary), the Applicant must:</p> <p>(a) make the following information and documents (as they are obtained or approved) publicly available on its website:</p> <p>...</p> <p>(ix) a complaints register, updated monthly;...</p>	<p>IA1 - Audit Finding</p> <p>The condition requires that a complaints register, updated monthly, be made publicly available on the development website. A review of the Development website indicated that complaints have been reported to end May 2025, rather than end June 2025 which should be the case given the date of the audit (9 July 2025).</p>	<p>It is recommended that Coombes update complaints reporting on the Development website to end of June 2025 and ensure complaints information is revised, or the complaints register uploaded monthly once/if complaints are received.</p>	Open



3.3 Adequacy of Environmental Management Plans, Sub-plans and post-approval documents

As part the Independent Audit, the Lead Auditor reviewed the CEMP, Sub-plans and environmental post-approval documents (refer Section 3.1 for references) and conducted a high-level assessment whether the above documents:

- have been developed in accordance with the conditions of consent and approvals applicable to the Project (if any) and their content is adequate; and
- have been implemented in accordance with the conditions of consent for the Project.

The Lead Auditor also assessed the adequacy of post approval documents (on the basis of whether):

- there are any non-compliances resulting from the implementation of the document; or
- whether there are any opportunities for improvement.

The Project's post-approval documents have been reviewed, endorsed and approved by required parties, the ER and DPHI. The endorsements and approvals confirm that the relevant requirements from the Project Approval, the EIS and RtS have been incorporated. DPHI approvals largely included reminders to ensure that approved documents were revised if Construction is delayed and overlaps with Western Sydney Airport operation, and are available on the Project website under Condition C20. This is further reviewed and evidenced in the Audit Table (refer **Appendix A**).

The CEMP, Sub Plans, Strategies and Construction Monitoring Programs prepared for the Project are of high quality. The evidence reviewed and/or sighted during this Independent Audit indicates that these documents are being implemented; with no non-compliances raised against the mitigation measures within.

3.4 Summary of notices from agencies

During the conduct of this first Independent Audit and interviews, the Auditees have confirmed that the Project has not been issued with any notices from agencies during the Audit Period.

3.5 Other matters considered relevant by the Auditor or DPHI

The Lead Auditor is not aware of any other matters considered relevant by DPHI other than inputs from DPHI during consultation on the scope of this first Independent Audit (refer Table 2 and where addressed).

3.6 Complaints

The complaints register was reviewed during the audit and showed zero complaints were received to 9 July 2025.



3.7 Incidents and non-compliances

Noting that construction commenced on 1/5/2025 with site establishment, the auditees stated that there were no reportable nor minor environmental incidents, and there were no non-compliances raised during the audit period (2 months).

Review of the ER fortnightly inspections within the audit period, aligned with the above reporting of environmental incidents and non-compliances.

3.8 Actual versus predicted impacts

A qualitative assessment has been undertaken as part of this Independent Audit to assess actual versus predicted impacts for works conducted during the audit period, considering below:

- The extent to which the Project has been altered to that assessed and approved in the EIS and RtS during the audit period
- Incidents and non-compliance during the audit period
- Complaints during the audit period
- Compliance with the Project Approval during the audit period
- Review of key scope consultation issues and area of concerns, and
- High -level assessment of adequacy and implementation of post approval documents.

Qualitative assessment findings are summarised below:

- Refer to Section 3.7 for incidents and non-compliances recorded within the audit period.
- Refer to Section 3.6 for complaints recorded within the audit period.
- Compliance with the project approval is tracked at a high level on an ongoing basis by Coombes and Texco via Texco's incident/event management platform. The ER and Principal Certifier (PC) have also been engaged and provide support in the management of compliance with the planning approval. The PC reviews compliance as part of Construction and Occupancy Certificate assessment and determination, a copy of which is submitted to DPHI.
- Refer Section 3.3 for a high -level assessment of the adequacy and implementation of post approval documents.

3.9 Environmental performance

The environmental performance of the Project during the audit period is considered by the Auditor to be high and is summarised below:

- **Incident and Non-Compliance Notification and Reporting - CoA C11 – C16:** The auditees stated that there were no reportable incidents nor non-compliances identified during the audit period.
- **Community Engagement and Complaints Management – B109 - B110:** The Coombes Complaints Register was reviewed as part of IA1 and found to meet the B110 requirements. The complaints register showed zero complaints were received to 9 July 2025. The auditees indicated that out of hours or activities resulting in nuisance or impact to receivers or stakeholders have not occurred during the audit period, therefore, associated specific consultation activities within the Community



Consultation Plan (CCP) have not been triggered. As a result, Consultation activities have comprised of Community Notifications published on the project Website. This will continue to be the case until road upgrades commence and or out of hour works or high noise impact activities occur.

The Auditees also indicated that a welcome to country ceremony was held with Registered Aboriginal Parties and other interested stakeholders, as well as Sod Turning event, which various stakeholders and Registered Aboriginal Parties attended.

- **Noise and Vibration and OOHW – B26 – B29 and B43 to B45:** The auditees indicated that there have been no out of hours works (OOHW) nor high noise impact activities during construction. Observations during the audit site inspection and plant and equipment maintenance and onboarding records indicated that the mitigation measures in Appendix 2 of the consent were being implemented.

Noise monitoring conducted at receivers R1 to R8 as part of Quarry operations requirements showed that noise levels from both Quarry activities and LRRF Construction remained below the Noise Management Levels (NMLs) adopted in the Construction Noise and Vibration Management Plan.

The auditees indicated that there has been no vibratory compaction within 30m of a structure.

Further assessment of environmental performance has been documented using photos, observations and notes.

The key issues and areas of focus raised by stakeholders (DPHI and EPA) during consultation are presented in Table 2 and consultation records are presented in **Appendix D**. The Auditors' review of those key consultation issues is presented below and the Audit Table in **Appendix A** includes audit evidence and findings.

3.9.1 Review of key DPHI scope consultation issues

DPHI did not have specific scope consultation requirements as part of this first Independent Audit.



4. CONCLUSIONS

This Audit Report presents the findings from the first Independent Audit for the LRRF Project, Stage 2, covering the period from 1 May 2025 to 9 July 2025.

In summary, a total of **176 conditions** were assessed. **zero non-compliances** and **two observations** were identified.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents (management plans, procedures, strategies and construction monitoring programs) that formed a part of the Audit Scope. The level of implementation of these requirements on site was also observed as high.

The Auditors would like to thank the Auditees from Coombes Property Group and Texco Construction for their organisation, cooperation and support during the audit.



5. SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS

LRRF SSD-10446



Environmental control plan on EHS information board including Ersed controls implemented.



General view of construction site to the south east – site is well planned, controlled and organised.



View east of the southern boundary.



SE Sediment basin well constructed, but overflow drainage per the Blue Book, such as a spillway, was not installed at the time. Spillway was later installed by Texco and subsequently confirmed in a CPESC inspection report.



Eastern boundary and no go zone flagging was missing but was installed the same day.



Earth berm along eastern third of southern boundary required re-shaping and compaction for stability.





Warehouse footings FRP works.



Light tower and concrete pump - new, well maintained and quiet.



NE Ersed controls – well installed and maintained.



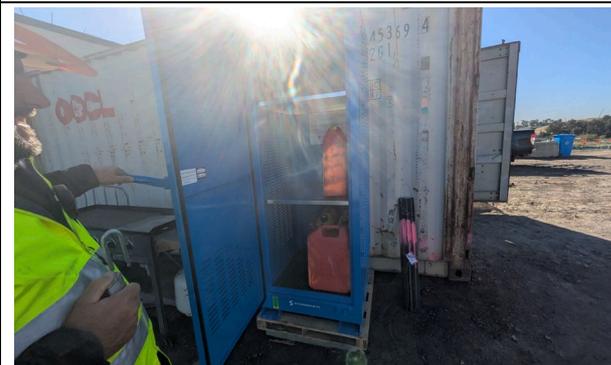
Northern boundary - View west of footing blinding concrete pours and well installed and maintained Ersed controls.



Concrete washout is well implemented.



Full Renier (EPLs 20582 and 12700) bin emptied on the day.



Dangerous goods stored in well constructed bunded dedicated stores.



View along the western boundary to the quarry entrance.





Spill kits available in appropriate areas were visible, well stocked and maintained.



Site Access Road to Adams Road was stable and clean, and Erosion controls were very well implemented.



Site Access Road to Adams Road – rumble grid.



Site Access Road to Adams Road – no appreciable tracking.



EHS information board well implemented and orderly.



Western Sydney Airport tank farm beyond quarry entrance.



Site compound luminaires aimed down.



Watercart in action on northern construction access road.



6. LIMITATIONS

The audit has been prepared in accordance with the associated proposal and HBI's Terms and Conditions. This report is for the sole purposes of the Client. Except as required by law, no third party may use or rely on this Report unless otherwise agreed by HBI in writing.

The matters raised in this report are only those which came to our attention during the course of performing our assessment and are not necessarily a comprehensive statement of all the weaknesses that may exist or improvements that might be made. Our work is performed on a sample basis; we cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of construction/operation and their responsibility to prevent and detect irregularities.

Recommendations and suggestions for improvement should be assessed by management for their full commercial impact before they are implemented. We have generally used and relied upon information supplied as being regarded as authoritative and reliable, but no warranty of completeness, accuracy, or reliability is given. The document review conducted during this assessment was limited to those documents and information supplied as part of the audit. The audit scope did not include the independent verification of these sources unless otherwise noted within the report. HBI will not accept any liability for inaccurate conclusions if the information provided was incomplete, inaccurate, withheld, misrepresented or otherwise not fully disclosed.

This Report does not purport to give legal advice; legal advice can only be given by qualified legal practitioners. To the extent permitted by law, HBI expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report (including without limitation matters arising from any negligent act or omission of HBI). HBI does not admit that any action, liability or claim may exist or be available to any third party. The scope of this audit does not cover a detailed verification of compliance with the conditions of the Deed, nor does it extend to the verification of items assessed by the Independent Certifier prior to issuing of a certificate for any stage.





HBI

Healthy Buildings International

APPENDIX A – SSD 10446 AUDIT TABLE



Item
Project Name: SSD 10446 Luddenham Resource Recovery Facility
Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
PART A ADMINISTRATIVE CONDITIONS				
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the Development, and any rehabilitation required under this consent.	<ul style="list-style-type: none"> Refer evidence throughout this audit table Interview with ER 07/07/2025 Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout.
TERMS OF CONSENT				
A2	The Development may only be carried out: <ul style="list-style-type: none"> (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) in accordance with the EIS and Response to Submissions; (d) in accordance with the Development Layout in Appendix 1; and (e) in accordance with the management and mitigation measures in Appendix 2. 	<ul style="list-style-type: none"> Luddenham Advanced Resource Recovery Centre Environmental Impact Statement (LARRC EIS), dated July 2020 (the EIS) Luddenham Advanced Resource Recovery Centre Submissions Report (RIS), dated May 2021 Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout. The auditees indicated there were no written directions during the audit period (01/1052024 to 0907/2024).
A3	Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: <ul style="list-style-type: none"> (a) 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 (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a). 	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The auditees indicated there were no written directions during the audit period (01/05/2025 to 09/07/2025).
A4	The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	No inconsistencies were identified during the audit period (01/1052025 to 0907/2025).

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LIMITS OF CONSENT				
Lapsing				
A5	This consent lapses five years after the date from which it operates unless the Development has physically commenced on the land to which the consent applies before that date.	<ul style="list-style-type: none"> Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	C	SSD-10446 approval was granted on 13/08/2024. Notification of commencement of construction was submitted to DPHI (as per Conditions A18& A19) . Commencement of Construction was within the five year requirement.
Continuation of Development after 31 December 2050				
A6	<p>For the continuation of the Development after 31 December 2050, the Applicant must seek further approval from the Minister (or delegate) to continue to carry out the Development at least four years prior to 31 December 2050.</p> <p>(1) In seeking the Minister's (or delegate) approval, the Applicant must:</p> <p>(a) justify the extension of the Development lifespan and set out the length of the requested extension;</p> <p>(b) provide evidence that the Traffic Performance Reports, Noise Verification Reports and Traffic Noise Verification Reports required by condition A14 and the peer review reports required by condition A17 have been completed and approved by the Planning Secretary;</p> <p>(c) provide evidence that the following reports have been completed and approved by the Planning Secretary:</p> <p>i. all Airport Safeguarding Audit Reports prepared in accordance with condition B2 and B4;</p> <p>ii. all Compliance Reports prepared in accordance with condition C15;</p> <p>iii. all Independent Audit Reports prepared in accordance with condition C17; and</p> <p>(d) provide evidence that all recommendations made in the following reports have been implemented to the satisfaction of the Planning Secretary:</p> <p>i. Airport Safeguarding Audit Reports as required by condition B3;</p> <p>ii. Compliance Reports as required by condition C15; and</p> <p>iii. Independent Audit Reports as required by condition C18.</p> <p>(2) In deciding whether to approve the continuation of the Development under this condition, the Minister must:</p> <p>(a) be satisfied that all requirements of condition A6(1) have been met;</p> <p>(b) be satisfied with the environmental performance of the facility at its capacity at the time the request is submitted;</p> <p>(c) consider the likely impacts from the continuation of the carrying out of the Development, including environmental impacts on both the natural and built environments, impacts on the safety and efficiency of the Western Sydney Airport, and social and economic impacts in the locality; and</p> <p>(d) consult with and consider the advice of the EPA, TfNSW, Council, Western Sydney Airport and DITRDCA.</p> <p>(3) The Minister (or delegate) must provide written notice to the Applicant of the decision to approve or refuse the Applicant's request for the continuation of the Development after 31 December 2050 and the reasons for that decision. The written notice must be given to the Applicant no later than 31 December 2047, or within a further period agreed between the Planning Secretary and the Applicant.</p> <p>Note:</p> <p>1. This Development does not require a further development application or modification application to be made as part of seeking the approval of the Minister to permit the Development to operate beyond 31 December 2050. However, any such approval will be subject to the Applicant preparing the additional information outlined in condition A6 to the satisfaction of the Minister, in consultation with the EPA, TfNSW, Council, Western Sydney Airport and DITRDCA.</p> <p>2. If the Minister decides to approve the continuation of the development beyond 31 December 2050, the Minister may, in its written notice to the Applicant, permit the Applicant to submit a further extension request for the continuation of the development.</p>	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Audit period ends 9 July 2025
Decommissioning				
A7	The on-site facilities for the operation of the Development (excluding any building structures or services) must be decommissioned in accordance with the Decommissioning Management Plan approved under condition C8 following the cessation of operations on 31 December 2050, or such later date as approved by the Minister (or delegate) under condition A6.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Waste				
A8	The Applicant must ensure the Development does not: (a) receive and process more than 600,000 tonnes per annum (tpa) of general solid waste (non-putrescible), limited to building and demolition waste, commercial and industrial waste, wood waste, glass, plastic, rubber, plasterboard, ceramics, bricks, concrete, metal, paper, cardboard, asphalt waste, cured concrete from a batch plant, soils and excavated natural material; (b) receive any putrescible vegetative waste, garden waste, restricted solid waste, hazardous waste, special waste or asbestos waste; and (c) store more than 34,515 tonnes of unprocessed or processed waste at any one time.	• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
A9	All waste material received at the Development must be stored, handled and/or processed within the enclosed resource recovery facility building.	• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Staging				
A10	Despite condition A8, the Applicant must not receive or process more than 200,000 tpa of general solid waste (non-putrescible) until the Planning Secretary has approved the commencement of Stage 2 Operations under conditions B2(b), B24, B39 and B41.	• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
A11	Despite condition A8, the Applicant must not receive or process more than 400,000 tpa of general solid waste (non-putrescible) until the Planning Secretary has approved the commencement of Stage 3 Operations under conditions B2(c), B24, B39 and B41.	• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Operating Hours				
A12	The Applicant must not operate the Development during evening or night-time periods.	• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
A13	(1) Despite condition A12 and the hours of work specified in condition B26, the Applicant may seek the Planning Secretary's written approval to carry out 24-hour operation of the Development following the commencement of operation of the Western Sydney Airport. The request must include the following: a) results of background noise monitoring carried out in accordance with the NSW Noise Policy for Industry (EPA, 2017) using long-term background noise measurements at each existing residential land use location identified in Table 3 in condition B33, after the commencement of operation of the Western Sydney Airport; b) the intrusiveness and maximum noise trigger levels established in accordance with the NSW Noise Policy for Industry (EPA, 2017); and c) demonstration that noise generated by operation of the Development does not exceed the intrusiveness and maximum noise trigger levels established under condition A13b) during the evening and night-time periods. (2) In deciding whether to approve 24-hour operation of the Development the Planning Secretary must consult and consider the advice of the EPA. (3) If the Planning Secretary approves 24-hour operation of the Development under condition A13(1), the Applicant must comply with the noise limits for evening and night periods set by the Planning Secretary as part of the written approval granted.	• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
ENVIRONMENTAL PERFORMANCE REVIEW				
A14	<p>12 months prior to 31 December 2036 and five years prior to 31 December 2050, the Applicant must carry out an Environmental Performance Review of the Development to the satisfaction of the Planning Secretary. As part of the Review, the Applicant must prepare and submit the following reports for approval by the Planning Secretary:</p> <p>(a) a Traffic Performance Report which must:</p> <p>(v) verify the predicted operational traffic numbers and impacts on road safety and the capacity of the road network using a calibrated SIDRA model or similar suitable traffic model in accordance with TfNSW Traffic Modelling Guidelines (TfNSW, 2013), including impacts on intersection efficiency, property access, pedestrian access, amenity and road pavement;</p> <p>(vi) include details of any additional management or mitigation measures required to accommodate the increased capacity and/or ongoing operation of the Development, including:</p> <p>i. any upgrades or changes in road infrastructure required for the Development</p> <p>ii. funding arrangements for the delivery of upgrades or changes in road infrastructure required for the Development;</p> <p>iii. a timetable for the implementation of any required actions; and</p> <p>(vii) a review of the consistency and compatibility of the proposed management and mitigation measures with the traffic management measures detailed in The Northern Road Upgrade Stage 6 Adams Road Traffic Performance Report, prepared by Jacobs Group (Australia) Pty Ltd dated 20 December 2021; and</p> <p>(viii) a program to monitor and report on the effectiveness of the above measures.</p> <p>(b) a Noise Verification Report which must:</p> <p>(i) demonstrate that noise monitoring and verification has been carried out by a suitably qualified and experienced acoustic consultant in accordance with:</p> <p>i. the Australian Standard AS 1055:2018 Acoustics – Description and measurement of environmental noise (Standards Australia, 2018);</p> <p>ii. the EPA Approved Methods for the Measurement and Analysis of Environmental Noise in NSW (EPA, 2022); and</p> <p>iii. the NSW Noise Policy for Industry (EPA, 2017);</p> <p>(ii) verify the predicted noise impacts of the Development, including identification of any additional at-source mitigation and management measures required to address any non-compliance with the noise limits specified in condition B20 and B21(a) and analysis of their effectiveness;</p> <p>(iii) a program to monitor and report on the effectiveness of the above measures; and</p> <p>(iv) a description of contingency measures in the event at-source mitigation measures are not effective in reducing noise levels to an acceptable level.</p> <p>(c) a Traffic Noise Verification Report which must:</p> <p>(i) demonstrate that noise monitoring and verification has been carried out by a suitably qualified and experienced acoustic consultant in accordance with:</p> <p>i. the Australian Standard AS 1055:2018 Acoustics – Description and measurement of environmental noise (Standards Australia, 2018);</p> <p>ii. the EPA NSW Road Noise Policy (EPA, 2011); and</p> <p>iii. the TfNSW Road Noise Model Validation Guideline (TfNSW, 2022); and</p> <p>(ii) include:</p> <p>i. traffic noise monitoring data recorded at all noise sensitive receivers along Adams Road between the site access and The Northern Road at the time of preparing the traffic noise verification report;</p> <p>ii. traffic count and traffic classification data collected during the noise monitoring period;</p> <p>iii. an analysis of compliance with the noise criteria and relative increase criteria specified in the RTS and B21(b);</p> <p>iv. an outline of at-source mitigation measures to be taken to address any exceedances identified in clause (iii) above;</p> <p>v. a program to monitor and report on the effectiveness of the above measures; and</p> <p>vi. a description of contingency measures in the event at-source measures are not effective in reducing noise levels to an acceptable level.</p> <p>(d) an Airport Safeguarding Audit Report which must:</p> <p>(i) be prepared to the satisfaction of the Planning Secretary in consultation with Western Sydney Airport and DITRDCA;</p> <p>(ii) be carried out at the Applicant's expense by a suitably qualified and experienced person or team, who have been approved by the Planning Secretary and are independent of the Development;</p> <p>(iii) be provided to Western Sydney Airport and DITRDCA for review and comment on:</p> <p>i. the proposed assessment and reporting methodology; and</p> <p>ii. the findings and recommendations of the audit;</p> <p>(iv) include details of the site inspection and any recorded airport safeguarding incidents both on and off the site;</p> <p>(v) review the effectiveness of the Wildlife Strike and FOD Management Plans identified in conditions B29 and B31 and benchmark the control measures against best practice mitigation and management, with reference to the Australian Aviation Wildlife Hazard Group Recommended Practices;</p> <p>(vi) include an assessment against all airport safeguarding measures required under the 'National Airports Safeguarding Framework'; and</p> <p>(vii) provide details of any additional management or mitigation measures required and a timetable for the implementation of any required actions.</p>	<p>• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025</p>	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
	<p>Note:</p> <ol style="list-style-type: none"> The Planning Secretary will consult with: <ul style="list-style-type: none"> EPA during its consideration of the Noise Verification Report TfNSW and Council during its consideration of the Traffic Performance Report Western Sydney Airport and DITRDCA during its consideration of the Airport Safeguarding Audit Report. The Planning Secretary may direct the Applicant to carry out additional Airport Safeguarding Audits if deemed necessary following review of the outcomes of any Airport Safeguarding Audit in accordance with condition A2(b). 			
A15	If the Planning Secretary is not satisfied with the performance of the Development following the review of the reports prepared as part of the Environmental Performance Review carried out under condition A14, the Planning Secretary may direct the Applicant to reduce the scale of operations to the previous operational stage if the development is at Stage 2 Operations or Stage 3 Operations for a defined period of time to minimise environmental impacts.	• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
A16	The Applicant must not increase throughput to Stage 2 Operations or Stage 3 Operations (in accordance with the Planning Secretary's direction under condition A15 above, until such time the Planning Secretary has provided written approval to do so.	• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
A17	Prior to submitting any of the reports required under condition A14, the Applicant must engage a suitably qualified and independent expert(s) approved by the Planning Secretary to carry out a peer review of the reports. The peer review report(s) must be provided to the Planning Secretary as part of the Environmental Performance Review under condition A14.	• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
NOTIFICATION OF COMMENCEMENT				
A18	The date of commencement of each of the following phases of the Development must be notified to the Planning Secretary in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary: <ol style="list-style-type: none"> construction; operation; cessation of operations; and decommissioning. 	<ul style="list-style-type: none"> Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	C	Letter of notification dated 04/02/2025 notifies of commencement of construction, with actual commencement of construction on 01/05/2025 as indicated by the auditee - 3 months after notification of construction.

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A19	<p>If the construction or operation or decommissioning of the Development is to be staged, the Planning Secretary must be notified in writing, at least one month before the commencement of each stage (or other timeframe agreed with the Planning Secretary), of the date of commencement and the development to be carried out in that stage.</p> <p><i>Note: This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under Part 6 of the EP&A Act. The surrender should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used.</i></p>	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Auditees indicated construction has not been staged
EVIDENCE OF CONSULTATION				
A20	<p>Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <p>(a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and</p> <p>(b) provide details of the consultation undertaken including:</p> <p>(i) the outcome of that consultation, matters resolved and unresolved; and</p> <p>(ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</p>	<ul style="list-style-type: none"> Luddenham Resource Recovery Facility Project website: https://luddenhamrecycling.com.au/ Interview with ER 07/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 CEMP Appendix F– Luddenham Advanced Resource Recovery Centre Aboriginal Cultural Heritage Management Plan, Revision 4, dated 06/03/2025. CEMP Appendix I – Luddenham Advanced Resource Recovery Centre Biodiversity Management Plan, Revision R5, dated 11/03/2025. ER Endorsement Letter "SSD 10446 – Luddenham Resource Recovery Facility – Biodiversity Management Plan (BMP)", dated 11/03/2025. CEMP Appendix J – Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446 Construction Traffic Management Plan, Revision 6, dated 25/03/2025. ER Endorsement Letter "SSD 10446 – Luddenham Resource Recovery Facility – Construction Traffic Management Plan (CTMP)", dated 26/03/2025. DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 	C	Where appropriate, the details of third party consultation are included in each relevant document. DPHI approved the Stage 2 CEMP & Sub-plans, which included the verification of third party consultation in a letter dated 31/03/2025.
STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS				
A21	<p>With the approval of the Planning Secretary, the Applicant may:</p> <p>(a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the Development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);</p> <p>(b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and</p> <p>(c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the Development).</p>	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Auditees indicated construction has not been staged
A22	<p>If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.</p>	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Auditees indicated construction has not been staged
A23	<p>If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.</p>	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with ER 07/07/2025 	NT	The auditees indicated that there have not been no updates of strategies, plans or programs during the audit period. The auditees indicated that at the date of the Audit a new revised Community Consultation Plan was with the DPHI for approval.

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HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
PROTECTION OF PUBLIC INFRASTRUCTURE				
A24	<p>Before the commencement of construction of the Development, the Applicant must:</p> <p>(a) consult with the relevant owner and provider of services that are likely to be affected by the Development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;</p> <p>(b) prepare a dilapidation report identifying the condition of all public infrastructure fronting the Development in Adams Road (including roads, gutters, footpaths, services and street trees) and the Western Sydney Airport aviation fuel farm; and</p> <p>(c) submit a copy of the dilapidation report to the Planning Secretary, Western Sydney Airport Corporation, DITRDCA and Council.</p>	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Opt-34189, Adams Road, Luddenham NSW, Pre-Construction Geotagged Condition Survey, dated December 17 2024, Post Approval Form_20250122051751 of 22/01/2025, submission of dilapidation report. DPHI letter: Luddenham Resource Recovery Facility – Written Agreement with Sydney Water, dated 28/03/2025, confirming an agreement has been entered into with Sydney Water 	C	<p>The auditees indicated that apart from Sydney Water assets, there have not been other services to be affected by construction. Coombes PG have entered into a written agreement with Sydney Water to the Secretary's satisfaction.</p> <p>A dilapidation report includes prepared that includes Anton road (provides access to the Western Sydney Airport aviation fuel farm), which was submitted to DPHI.</p> <p>The Auditees indicated that no works will be conducted on Anton Road, therefore, construction of the Development will not impact on the Western Sydney Airport aviation fuel farm. This has been accepted by the Independent Certifier as part of Construction Certificate 1 (CC1)</p>
A25	<p>Unless the Applicant and the applicable authority agree otherwise, the Applicant must:</p> <p>(a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the Development; and</p> <p>(b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the Development.</p>	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	<p>The auditees indicated that there has been no damage identified as a result of construction works in the audit period.</p>
DEMOLITION				
A26	<p>All demolition must be carried out in accordance with Australian Standard AS 2601-2001 The Demolition of Structures (Standards Australia, 2001).</p>	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	<p>The auditees indicated that there has been no demolition conducted in audit period</p>

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STRUCTURAL ADEQUACY				
A27	<p>All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the Development, must be constructed in accordance with the relevant requirements of the BCA.</p> <p>Note:</p> <ul style="list-style-type: none"> Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. The EP&A (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the Development. 	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	C	<p>The auditees indicated construction during the audit period has not involved alterations of structures. Construction Certificate 1 (CC1) was issued in relation to "Bulk earthworks, warehouse structure (footings, precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, pump room only, associated with the construction and operation of a resource recovery facility with a capacity to accept and process up to 600,000 tonnes per annum of construction and demolition waste and commercial industrial waste."</p>
CONTRIBUTIONS				
A28	<p>A special infrastructure contribution must be made in accordance with the Environmental Planning and Assessment (Special Infrastructure Contribution – Western Sydney Aerotropolis) Determination 2022 (2022 Determination) as in force when this development consent takes effect.</p> <p>A person may not apply for a subdivision certificate or construction certificate (as the case may require, having regard to the 2022 Determination) in relation to the Development the subject of this development consent unless the person provides, with the application, written evidence from the Department that the special infrastructure contribution for the Development (or that part of the Development for which the certificate is sought) has been made or that arrangements are in force with respect to the making of the contribution.</p> <p>Note:</p> <ul style="list-style-type: none"> A request for assessment by the Department of the amount of the contribution that is required under this condition can be made through the NSW planning portal (https://www.planningportal.nsw.gov.au/development-assessment/contributions/sic-online-service). Please refer enquiries to SIContributions@planning.nsw.gov.au. Under section 6.28 of the EP&A Act, Crown building work cannot commence unless it has been certified as complying with the BCA. Accordingly, if the Development comprises Crown building work, the special infrastructure contribution should be paid before that certification has occurred. 	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 	C	<p>CC1 lists in documentation relied upon: <i>Certificate of Payment – Western Sydney Aerotropolis Special Infrastructure Contribution by NSW Department of Planning, Housing and Infrastructure</i>, dated 04.02.2025.</p>
COMPLIANCE				
A29	<p>The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the Development.</p>	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Texco Construction Site Specific Induction, Luddenham Recycling Park, 275 Adams Road Luddenham NSW 	C	<p>Sections 13 to 20 of the construction site specific induction address various aspects of the conditions of consent. Notably the site specific induction states; <i>The NSW Government: Department of Planning, Housing and Infrastructure Development Application No. SSD-10446 Development Consent dated 13th August 2024 nominated approved hours of work are detailed below:</i></p> <ul style="list-style-type: none"> 7:00am to 6:00pm Mondays to Fridays 8:00am to 1:00pm Saturdays No work Sundays or Public Holidays <p><i>These hours can only be varied under the authority of a Texco Representative who will seek appropriate approvals through the Consent Authority where necessary.</i></p>
OPERATION OF PLANT AND EQUIPMENT				
A30	<p>All plant and equipment used on site, or to monitor the performance of the Development, must be:</p> <ol style="list-style-type: none"> maintained in a proper and efficient condition; and operated in a proper and efficient manner. 	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Sample service records and onboarding checklists where obtained for a concrete pump and boom, a lighting tower and a grader. Sample calibration certificate record was obtained for a Sound Level Meter utilised to monitor noise levels. 	C	<p>Texco maintains plant and equipment service onboarding records. Sample service and onboarding records as well as observations during the site inspection showed plant used is well maintained and operated appropriately and plant onboarded is rigorously vetted before use.</p> <p>Coombes PG maintains monitoring equipment calibration records which show monitoring equipment is calibrated in accordance with relevant standards and manufacturers recommendations.</p>

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EXTERNAL WALLS AND CLADDING				
A31	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 	C	<p>There are no additions to existing buildings proposed or undertaken as part of the development as there are no existing buildings within the Construction boundary.</p> <p>Construction Certificate 1 (CC1) was issued in relation to "Bulk earthworks, warehouse structure (footings, precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, pump room only, associated with the construction and operation of a resource recovery facility with a capacity to accept and process up to 600,000 tonnes per annum of construction and demolition waste and commercial industrial waste."</p> <p>Information provided as part of CC1, includes a Certificate of Conformity for CEMINTEL Commercial ExpressPanel Wall Cladding System prepared by SAI Global on 26/06/24 for facade materials.</p>
A32	Prior to the issuing of: (a) any Construction Certificate relating to the construction of external walls (including the installation of finishes and claddings such as synthetic or aluminium composite panels); and (b) an Occupation Certificate, the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls (including finishes and claddings such as synthetic or aluminium composite panels) comply with the requirements of the BCA.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 	C	<p>Construction Certificate 1 (CC1) was issued in relation to "Bulk earthworks, warehouse structure (footings, precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, pump room only, associated with the construction and operation of a resource recovery facility with a capacity to accept and process up to 600,000 tonnes per annum of construction and demolition waste and commercial industrial waste."</p> <p>Information provided as part of CC1, includes aluminium facade materials provided by Arcadia Architectural.</p>
A33	The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 NSW Planning, email "Construction certificate (CFT-684942) for 275 Adams Road Luddenham 2745: Application has been determined" dated 28/4/25 confirming acceptance of CC1 	C	CC1 was determined on 24/04/25 by the Certifier and was determined by NSW planning on or before 28/04/25
UTILITIES AND SERVICES				
A34	Before the construction of any utility works associated with the Development, the Applicant must obtain relevant approvals from service providers.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 	NT	The auditees indicated that there has been no construction of utility works associated with the Development. This is supported by the scope of documentation provided to the Certifier with CC1.
A35	Before the commencement of operation of the Development, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the Sydney Water Act 1994.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
A36	Prior to the commencement of construction of the Development the Applicant must provide evidence of a written agreement with Sydney Water regarding the provision of and connection to regional stormwater infrastructure on the land at 275 Adams Road, Luddenham, to the satisfaction of the Planning Secretary.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 DPHI letter: Luddenham Resource Recovery Facility – Written Agreement with Sydney Water, dated 28/03/2025, confirming an agreement has been entered into with Sydney Water to DPHI's satisfaction. 	C	DPHI letter dated 28/3/25 states that "The Department has carefully reviewed the documentation and is satisfied that it meets the requirements of condition A36 of the consent."
WORK AS EXECUTED PLANS				
A37	Before the issuing of the Occupation Certificate for the Development, work-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Principal Certifier.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The auditees indicated the project has not applied to the Certifier for an Occupation Certificate.

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ENVIRONMENTAL REPRESENTATIVE				
A38	Works must not commence until an Environmental Representative (ER) has been approved by the Planning Secretary and engaged by the Applicant.	• DPHI Independent ER Appointment Letter, dated 19/12/2024	C	Independent Appointment letter sighted for ER (Mr Richard Peterson) and Alternate ER (Ben Bracken) approved by DPHI on 19/12/24. Works commenced on 01/05/2025, after ER and Alternate ER approval on 19/12/24.
A39	The Planning Secretary's approval of an ER must be sought no later than one month before the commencement of works, or within another timeframe agreed with the Planning Secretary.	• Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • DPHI Independent ER Appointment Letter, dated 19/12/2024 • Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025.	C	Independent Appointment letter sighted for ER (Mr Richard Peterson) and Alternate ER (Ben Bracken) approved by DPHI on 19/12/24. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee
A40	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the EIS or Response to Submissions and is independent from the design and construction personnel for the Development.	• DPHI Independent ER Appointment Letter, dated 19/12/2024	C	Independent Appointment letter sighted for ER (Mr Richard Peterson) and Alternate ER (Ben Bracken) approved by DPHI on 19/12/24. DPHI reviews the qualifications and experience (e.g. CV), and independence (i.e. Declaration of Independence) of the nominated ER and Alternate ER prior to approval.
A41	The Applicant may engage more than one ER for the Development, in which case the functions to be exercised by an ER under the terms of this approval may be carried out by any ER that is approved by the Planning Secretary for the purposes of the Development.	• DPHI Independent ER Appointment Letter, dated 19/12/2024	C	Independent Appointment letter sighted for ER (Mr Richard Peterson) and Alternate ER (Ben Bracken) approved by DPHI on 19/12/24.
A42	For the duration of the works until two years after the commencement of Stage 2 operations, or as agreed with the Planning Secretary, the approved ER must: (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the Development; (b) consider and inform the Planning Secretary on matters specified in the terms of this consent; (c) consider and recommend to the Applicant any improvements that may be made to work practices to avoid or minimise adverse impact to the Western Sydney Airport (including in relation to aviation impacts such as wildlife attraction and FOD risk from the Development), the environment and to the community; (d) review documents prepared in accordance with the requirements of the conditions in Part C of this consent and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this consent and if so: (i) make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary/Department for information or are not required to be submitted to the Planning Secretary/Department); (e) regularly monitor the implementation of the documents identified in condition A42(d) to ensure implementation is being carried out in accordance with the document and the terms of this consent; (f) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints; and (g) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Quarterly Report providing the information set out in the Department's 'Environmental Representative Protocol' (2018) under the heading "Environmental Representative Monthly Reports." The Environmental Representative Quarterly Report must be submitted within seven calendar days following the end of each quarter period for the duration of the ER's engagement for the Development, or as otherwise agreed with the Planning Secretary.	• Interview with ER 07/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 06/05/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 20/05/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 03/06/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 17/06/2025 • Trigalana Environmental letter "SSD 10446 – Luddenham Resource Recovery Facility", dated 30/01/2025, endorsing: Luddenham Advanced Resource Recovery Centre, Construction Environmental Management Plan (Rev3), Community Consultation Plan (Rev2), Construction Noise and Vibration Management Plan (Rev3), Construction Waste Management Plan (Rev2), Erosion and Sediment Control Plan (Rev0), Construction Traffic Management Plan (Rev3), Aboriginal Cultural Heritage Management Plan (Rev3), and Biodiversity Management Plan (Rev4). • Trigalana Environmental letter "SSD 10446 – Luddenham Resource Recovery Facility – Construction Waste Management Plan (CWMP)", dated 10/03/2025, endorsing: Luddenham Advanced Resource Recovery Centre, Construction Waste Management Plan (Rev3). • Trigalana Environmental letter "SSD 10446 – Luddenham Resource Recovery Facility – Biodiversity Management Plan (BMP)", dated 11/03/2025, endorsing: Luddenham Advanced Resource Recovery Centre, Biodiversity Management Plan (Rev5). • Trigalana Environmental letter "SSD 10446 – Luddenham Resource Recovery Facility – Construction Environmental Management Plan (CEMP)", dated 26/03/2025, endorsing: Luddenham Advanced Resource Recovery Centre, Construction Environmental Management Plan (Rev5). • Trigalana Environmental letter "SSD 10446 – Luddenham Resource Recovery Facility – Construction Traffic Management Plan (CTMP)", dated 26/03/2025, endorsing: Luddenham Advanced Resource Recovery Centre, Construction Traffic Management Plan (Rev6).	C	(a) No formal communication has been received from DPHI requiring ER response within the audit period. (b) ERs provide information to the Planning Secretary predominantly via reports and meetings. No ER Quarterly reports were provided this period as construction commenced 1 May 2025, hence the first quarterly report is due 7 August 2025 and no meetings have needed to be convened with DPHI as environmental issues and concerns have been of a routine nature as noted by the ER. (c) ER recommendations are included in Inspection Reports, which are in the form of risk rated Issues and Observations related to environmental management. (d) The ER reviewed and endorsed the following documents prior to submission to the Secretary: • Construction Environmental Management Plan (Rev5) • Construction Traffic Management Plan (Rev6) • Biodiversity Management Plan (Rev5) • Construction Waste Management Plan (Rev3) • Aboriginal Cultural Heritage Management Plan (Rev3) • Construction Noise and Vibration Management Plan (Rev3) • Community Consultation Plan (Rev2) (e) The implementation of the documents listed in Conditions A42(d) is predominantly monitored during ER site inspections, which are fortnightly. (f) There has been no request made by the Planning Secretary to the ER to assist with audits during the audit period. (g) No ER Quarterly reports were provided this period as construction commenced 1 May 2025, hence the first quarterly report is due 7 August 2025.
A43	The Applicant must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in condition A42 (including preparation of the ER Quarterly Report), as well as: (a) the complaints register (to be provided on a daily basis); and (b) a copy of any assessment carried out by the Applicant of whether proposed work is consistent with the consent (which must be provided to the ER before the commencement of the subject work).	• Interview with ER 07/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	C	The ER indicated that the project was responsive and cooperative in providing documentation requested. The Auditees indicated that there no complaints received in audit period. The Auditees indicated that there no assessments of consistency with the Consent prepared during the audit period.

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APPLICABILITY OF GUIDELINES				
A44	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.	• SSD-10446 Consent, dated 13/08/2024	C	Guidelines and Standards referenced in the documents reviewed, including in CC1 are to versions at the time of the Consent.
A45	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	• Interview with ER 07/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	The Auditees indicated that there have been no directions received from DPPI
ADVISORY NOTES				
AN1. All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the Development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.				
AN2. The Minister or Planning Secretary may issue a Development Control Order for non-compliance with any condition of this consent. This may include a Stop Use Order or Compliance Order under Division 9.3 and Schedule 5 of the EP&A Act.				
PART B SPECIFIC ENVIRONMENTAL CONDITIONS				
AIRPORT SAFEGUARDING				
Safety and Efficiency of Western Sydney Airport				
B1	The Development must not have any impact on the safety or efficiency of the operations of the Western Sydney International (Nancy-Bird Walton) Airport.	• Interview with ER 07/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	The Western Sydney International (Nancy-Bird Walton) Airport was not Operating this Audit Period
Airport Safeguarding Audit				
B2	The Applicant must commission and pay the full cost of an Airport Safeguarding Audit: (a) within six months of the commencement of Stage 1 Operations and every six months until 24 months after the commencement of operations of the Western Sydney Airport (b) prior to the commencement of Stage 2 Operations; (c) prior to the commencement of Stage 3 Operations; (d) within six months of the commencement of Stage 3 Operations of the Development; (e) six months prior to 31 December 2036; and (f) 24 months prior to 31 December 2050 <i>Note: The Planning Secretary may agree to combine any of the above audits if they were to overlap in their timing of commissioning.</i> <i>Note: Condition A10 and A11 restrict the expansion of the development to Stage 2 Operations or Stage 3 Operations without the Planning Secretary's approval of the Airport Safeguarding Audits required under condition B2(b) and B2(c), respectively.</i>	• Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B3	Within one month of completing each Airport Safeguarding Audit carried out in accordance with condition B2, the Applicant must submit a report to the satisfaction of the Planning Secretary for approval. The audit report must be accompanied by a program for the implementation of all recommendations made in the audit report. If the Applicant intends to defer the implementation of a recommendation, reasons must be documented.	• Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B4	<p>Each of the Airport Safeguarding Audit reports required by condition B2 must:</p> <p>(a) be prepared to the satisfaction of the Planning Secretary in consultation with Western Sydney Airport and DITRDCA;</p> <p>(b) be carried out at the Applicant's expense by a suitably qualified and experienced person or team, who have been approved by the Planning Secretary and are independent of the Development be provided to Western Sydney Airport and DITRDCA for review and comment on:</p> <p>(i) the proposed auditing and reporting methodology; and</p> <p>(ii) the findings and recommendations of the audit;</p> <p>(c) include details of the site inspection and any recorded airport safeguarding incidents both on and off the site;</p> <p>(d) review the effectiveness of the Wildlife Strike and FOD Management Plans identified in conditions B7 and B9 and benchmark the control measures against best practice mitigation and management, with reference to the Australian Aviation Wildlife Hazard Group Recommended Practices;</p> <p>(e) include a review of consistency against all airport safeguarding measures required under the 'National Airports Safeguarding Framework'; and</p> <p>(f) provide details of any additional management or mitigation measures required and a timetable for the implementation of any required actions.</p> <p>Note: The Planning Secretary will consult with Western Sydney Airport and DITRDCA during its consideration of all Airport Safeguarding Audit Reports.</p> <p>Note: The Planning Secretary may direct the Applicant to carry out additional Airport Safeguarding Audits if deemed necessary following review of the outcomes of any Airport Safeguarding Audit in accordance with condition A2(b).</p>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B5	<p>If the Planning Secretary is not satisfied with the performance of the Development following the review of an Airport Safeguarding Audit Report carried out under condition B2, the Planning Secretary may direct the Applicant to:</p> <p>(a) reduce the scale of operations to the previous operational stage if the development is at Stage 2 Operations or Stage 3 Operations; for a defined period of time to minimise impacts.</p>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B6	<p>The Applicant must not increase throughput to Stage 2 Operations or Stage 3 Operations (in accordance with the Planning Secretary's direction under condition B5 above), until such time the Planning Secretary has provided written approval to do so.</p>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Wildlife Hazard Management				
B7	<p>Prior to the commencement of Stage 1 Operations of the Development, the Applicant must prepare a Wildlife Hazard Management Plan in consultation with Western Sydney Airport and DITRDCA which addresses the management of both ground-based and airborne wildlife management. The Plan must form part of the OEMP required by condition C5 and must:</p> <p>(a) be prepared by a suitably qualified or experienced person(s) approved by the Planning Secretary;</p> <p>(b) describe monitoring protocols;</p> <p>(c) provide details of staff training regarding wildlife awareness and management;</p> <p>(d) detail mitigation measures to minimise wildlife attraction, including those identified in the Wildlife Hazard Assessment dated April 2022 prepared by EMM Consulting Pty Limited;</p> <p>(e) establish trigger thresholds for investigating additional measures to reduce wildlife attraction; and</p> <p>(f) describe protocols for reducing wildlife attraction if trigger thresholds are exceeded.</p>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B8	<p>The Applicant must:</p> <p>(a) not commence Stage 1 Operations until the Wildlife Hazard Management Plan is approved by the Planning Secretary; and</p> <p>(b) implement the most recent version of the Wildlife Hazard Management Plan approved by the Planning Secretary for the duration of the Development.</p>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

Item
Project Name: SSD 10446 Luddenham Resource Recovery Facility
Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Foreign Object Debris				
B9	Prior to the commencement of Stage 1 Operations of the Development, the Applicant must prepare a Foreign Object Debris (FOD) Management Plan in consultation with Western Sydney Airport and DITRDCA. The Plan must form part of the OEMP required by condition C5 and must: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified or experienced person(s) approved by the Planning Secretary; (b) identify potential FOD risks associated with the Development; (c) identify the control measures that will be implemented to manage potential FOD risks associated with the Development, including those identified in the Response to the Department's Request for Information dated 7 April 2022 prepared by EMM Consulting Pty Limited; (d) include details of fence design and height adjacent to the incoming weighbridge area; (e) describe inspection and corrective action protocols; and (f) provide details of staff training regarding FOD risks and appropriate corrective actions. 	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B10	The Applicant must: <ul style="list-style-type: none"> (a) not commence Stage 1 Operations until the FOD Management Plan is approved by the Planning Secretary; and (b) implement the most recent version of the FOD Management Plan approved by the Planning Secretary for the duration of the Development. 	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B11	All roller doors to the resource recovery facility building must be designed to be automatically closing and default to a closed position during operations to protect against wildlife attraction and FOD risks.	<ul style="list-style-type: none"> • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Construction Certificate 1 , Certificate No. CC-24010, determined 24/04/25 	NT	<p>The Auditees indicated that there design is ongoing.</p> <p>Construction Certificate 1 (CC1) was issued in relation to "Bulk earthworks, warehouse structure (footings, precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, pump room only, associated with the construction and operation of a resource recovery facility with a capacity to accept and process up to 600,000 tonnes per annum of construction and demolition waste and commercial industrial waste."</p> <p>CC1 states; "This staged Construction Certificate has been issued for the building works described above only. Separate Construction Certificate/s will be required prior to commencement of any subsequent works."</p>
B12	All loading and unloading of waste must occur within the resource recovery facility building. <p>Note: The Airports (Protection of Airspace) Regulation 1996 applies to any intrusions into prescribed airspace, which could include:</p> <ul style="list-style-type: none"> • constructing permanent structures, such as buildings, into the protected airspace; • temporary structures such as cranes protruding into the protected airspace; or • activities causing non-structural intrusions into the protected airspace, such as air turbulence from stacks or vents, smoke, dust, steam or other gases or particulate matter. <p>If any of the above components would result in a further impact on protected airspace, approval will need to be obtained in accordance with the Airports Act 1996 and the Airports (Protection of Airspace) Regulation 1996.</p>	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
TRAFFIC AND ACCESS				
Construction Traffic Management Plan				
B13	Prior to the commencement of construction of the Development, the Applicant must prepare a Construction Traffic Management Plan for the Development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by condition C2 and must: <ul style="list-style-type: none"> (a) be prepared by a suitably qualified and experienced person(s) (b) be prepared in consultation with Council and TfNSW; (c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction; (d) detail heavy vehicle routes, access and parking arrangements; (e) include a Construction Driver Code of Conduct to: <ul style="list-style-type: none"> (i) minimise the impacts of earthworks and construction on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; and (iv) ensure truck drivers use specified routes; (f) include a program to monitor the effectiveness of these measures; and (g) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes. 	<ul style="list-style-type: none"> • Luddenham Resource Recovery Facility Project website: https://luddenhamrecycling.com.au/ • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • CEMP Appendix J – Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446 Construction Traffic Management Plan, Revision 6, dated 25/03/2025. • ER Endorsement Letter "SSD 10446 – Luddenham Resource Recovery Facility – Construction Traffic Management Plan (CTMP)", dated 26/03/2025. • DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix J - the Construction Traffic Management Plan (CTMP), in a letter dated 31/03/2025. Condition requirements are met in the CTMP as follows: <ul style="list-style-type: none"> (a) Section 1.2 (b) Section 1.4 (c) Sections 2 and to 3 (d) Sections 2.1, 2.2, and 3.11 (e) Appendix A (f) Section 4 (g) Sections 3.7 and 3.8

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B14	The Applicant must: (a) not commence construction until the Construction Traffic Management Plan required by condition B13 is approved by the Planning Secretary; and (b) implement the most recent version of the Construction Traffic Management Plan approved by the Planning Secretary for the duration of construction.	<ul style="list-style-type: none"> • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 • Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-122088 6:17 AM 22/05/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-128424 8:18 AM 30/05/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-132517 5:26 AM 06/06/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-135519 5:39 AM 13/06/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-148884 5:27 AM 04/07/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-152448 11:29 AM 10/07/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-84668 On 05/05/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-85295 On 06/05/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-97143 On 03/06/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-98825 On 06/06/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-108593 On 03/07/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-110144 On 08/07/2025 • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix J - the Construction Traffic Management Plan, in a letter dated 31/03/2025. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee The most recent version of the Construction Traffic Management Plan approved by the Planning Secretary is available on the project website Implementation is maintained through reminders briefings pre-start meetings and is monitored through weekly site inspections. Traffic control signage was observed during the audit site inspection.
Roadworks and Access				
B15	Prior to the commencement of construction of any works for the Development, the Applicant must submit design plans to the satisfaction of the relevant roads authority which demonstrate that the proposed accesses to the Development are designed to accommodate the turning path of a 26 metre B-double.	<ul style="list-style-type: none"> • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Liverpool City Council Letter Application Number RR-11/2025 "Roads Act 1993 - Section 138 - Permit to Carry Works, dated 18/03/2025 • Liverpool City Council Stamped Application Number RR-11/2025 drawings package. 	C	Liverpool Council Permit to Carry Out Works (dated 18/3/2025) on Adams Road between the site access and Anton Rd includes drawings submitted which demonstrate the proposed accesses to the Development are designed to accommodate the turning path of a 26 metre B-double. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee
B16	Prior to the commencement of operation of the Development, the Applicant must complete the following roadworks to the satisfaction of Council and must obtain approval for the works under section 138 of the Roads Act 1993: (a) pavement upgrades along Adams Road between the site access and Anton Road; and (b) road widening at the site access and Adams Road intersection.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B17	Prior to the commencement of construction of the Development the Applicant must obtain approval from Council's Pedestrian, Active Transport and Traffic Committee for the removal of the existing 3-tonne heavy vehicle load restriction on Adams Road between Elizabeth Drive and The Northern Road, if required by Council.	<ul style="list-style-type: none"> • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Email trail between Coombes PG and DPHI and Liverpool City Council "SSD10446 - Luddenham Resource Recovery Facility- CEMP/ LTC meeting - 3tonne load limit", dated 18/03/2025 to 28/05/2025 	C	An email dated 26 March 2025 from Liverpool City Council to the DPHI and Coombes PG indicates that "Heavy vehicles would be allowed to travel into proposed site from / to Elizabeth Drive and the Northern Road."
B18	Prior to the commencement of operation of the Development, the Applicant must obtain approval from the National Heavy Vehicle Regulator to permit 26 metre B-doubles to utilise Adams Road between Elizabeth Drive and The Northern Road, in consultation with Council.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Elizabeth Drive / Adams Road Intersection Works				
B19	Prior to the commencement of construction of the Elizabeth Drive / Adams Road intersection upgrade works, the Applicant must finalise and submit the detailed design of the intersection works to TfNSW for approval. The proposed intersection upgrade design must: (a) meet TfNSW and Council requirements; (b) be consistent with the Strategic Concept Design dated July 2021 prepared by Coombes Property Group and Indesco; (c) be in accordance with Austroads Guide to Road Design and Australian Codes of Practice; (d) be endorsed by a suitably qualified practitioner; (e) include a signage and line marking plan which includes signage prohibiting right turn movements from Elizabeth Drive to Adams Road; and (f) include detailed design plans and hydraulic calculations of any changes to the stormwater drainage system associated with the intersection upgrade.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The auditees indicated that construction of the Elizabeth Drive / Adams Road intersection upgrade works has not commenced as design being progressed, with an estimated finalisation date of end of 2025.
B20	Prior to the commencement of operation of the Development, the Applicant must: (a) complete the upgrade works to the intersection of Elizabeth Drive and Adams Road to the satisfaction of TfNSW; (b) implement the approved signage and line marking plan; and (c) enter into a Works Authorisation Deed with TfNSW for the Elizabeth Drive / Adams Road intersection upgrade works.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The auditees indicated that construction of the Elizabeth Drive / Adams Road intersection upgrade works has not commenced as design being progressed, with an estimated finalisation date of end of 2025.
Parking				
B21	The Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that traffic associated with the Development does not utilise public and residential streets or public parking facilities.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1 , Certificate No. CC-24010, determined 24/04/25 	C	Construction Certificate 1 (CC1) was issued in relation to "Bulk earthworks, warehouse structure (footings, precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, pump room only, associated with the construction and operation of a resource recovery facility with a capacity to accept and process up to 600,000 tonnes per annum of construction and demolition waste and commercial industrial waste." Information provided as part of CC1, includes: <ul style="list-style-type: none"> Car Park Compliance Review Drawings (Stanbury Traffic Planning , 11/04/25) with provision for 45 parking spaces Car Parking and Servicing Certification (Stanbury Traffic Planning , 15/04/25)
Operational Traffic Management Plan				
B22	Prior to the commencement of Stage 1 Operations, the Applicant must prepare an Operational Traffic Management Plan (OTMP) for the Development to the satisfaction of the Planning Secretary. The OTMP must form part of the OEMP required by Condition C5 and must: (a) be prepared by a suitably qualified and experienced person(s), whose appointment has been endorsed by the Planning Secretary; (b) be prepared in consultation with Council; (c) detail the measures that are to be implemented to ensure road safety and network efficiency; (d) detail heavy vehicle routes, access, and parking arrangements; (e) include a stockpile management plan to describe how waste and product stockpiles will be managed to allow the safe loading and unloading of heavy vehicles; (f) include an Operational Driver Code of Conduct to: <ul style="list-style-type: none"> (i) minimise the impacts on the local and regional road network; (ii) minimise conflicts with other road users; (iii) minimise road traffic noise; (iv) inform truck drivers of the site access arrangements and use of specified haul routes; (v) include a program to monitor the effectiveness of these measures; and (g) include a Traffic Control Plan (TCP) detailing: <ul style="list-style-type: none"> (i) heavy vehicle routes, road safety and efficiency measures and the on-site measures to be implemented to control the manoeuvring of vehicles in designated areas, including front-end loaders within the waste receipt and processing areas and mitigate the potential for on-site vehicle conflict; and (ii) installation of weighbridges and signage. 	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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B23	The Applicant must: (a) not commence Stage 1 Operations until the OTMP is approved by the Planning Secretary; and (b) implement the most recent version of the OTMP approved by the Planning Secretary for the duration of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)													
Traffic Performance Report																	
B24	Prior to the commencement of Stage 2 and Stage 3 Operations the Applicant must prepare and submit a Traffic Performance Report to the satisfaction of the Planning Secretary. The Traffic Performance Report must: (a) be prepared by a suitably qualified and experienced person(s), whose appointment has been endorsed by the Planning Secretary; (b) be prepared in consultation with TfNSW and Council; (c) be prepared in accordance with TfNSW 'Guide to Traffic Generating Developments' (RTA, 2002); (d) undertake traffic and transport survey in accordance with the relevant TfNSW and Austroads guidelines; (e) verify the predicted operational traffic numbers and impacts on road safety and the capacity of the road network using a calibrated SIDRA model or similar suitable traffic model in accordance with TfNSW Traffic Modelling Guidelines (TfNSW, 2013), including impacts on intersection efficiency, property access, pedestrian access, amenity and road pavement; (f) include details of any additional management or mitigation measures required to accommodate the increased capacity and/or ongoing operation of the Development, including: (i) any upgrades or changes in road infrastructure required for the Development (ii) funding arrangements for the delivery of upgrades or changes in road infrastructure required for the Development; (iii) a timetable for the implementation of any required actions; and (g) a review of the consistency and compatibility of the proposed management and mitigation measures with the traffic management measures detailed in The Northern Road Upgrade Stage 6 Adams Road Traffic Performance Report, prepared by Jacobs Group (Australia) Pty Ltd dated 20 December 2021; and (h) a program to monitor and report on the effectiveness of the above measures.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)													
B25	The Applicant must ensure: (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004), AS 2890.2:2018 Parking facilities Off-street Commercial Vehicle Facilities (Standards Australia, 2018) and AS 2890.6:2009 Parking facilities Off-street parking for people with disabilities (Standards Australia, 2009) (b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTRROADS guidelines; (c) the Development does not result in any vehicles queuing on the public road network; (d) heavy vehicles and bins associated with the Development are not parked on local roads or footpaths in the vicinity of the site; (e) all vehicles are wholly contained on site before being required to stop; (f) all loading and unloading of materials is carried out on-site; (g) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; and (h) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 	C	Construction Certificate 1 (CC1) was issued in relation to "Bulk earthworks, warehouse structure (footings, precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, pump room only, associated with the construction and operation of a resource recovery facility with a capacity to accept and process up to 600,000 tonnes per annum of construction and demolition waste and commercial industrial waste." Information provided as part of CC1, includes: <ul style="list-style-type: none"> Car Park Compliance Review Drawings (Stanbury Traffic Planning, 11/04/25) with provision for 45 parking spaces Car Parking and Servicing Certification (Stanbury Traffic Planning, 15/04/25), which concludes as follows: The following statements are provided directly in response to Condition: <ul style="list-style-type: none"> Table 1 certifies that the off street access and parking arrangements as detailed within the referenced construction plans suitably accord with the relevant requirements of AS2890.1:2004; Table 2, in combination with swept path plans contained within Appendix 1, certify that the vehicle access and internal manoeuvring has been designed for 26m long b double vehicles, in accordance with the relevant requirements of AS2890.2:2018; Table 3 certifies that the accessible parking space/s within the development are appropriately designed in accordance with the relevant requirements of AS2890.6:2009; The development design is capable of accommodating all vehicle manoeuvring and servicing wholly within the site in accordance with the specific requirement of Condition B25. 													
NOISE																	
Hours of Work																	
B26	The Applicant must comply with the hours detailed in Table 1, unless the Planning Secretary has otherwise agreed to the carrying out of 24-hour operation on the site (see condition A13). <i>Table 1 Hours of Work</i>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	C	The auditees indicated that there have been no out of hours works during construction. The auditees indicated no complaints have been received in relation to the construction works.													
	<table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Earthworks and construction</td> <td>Monday – Friday</td> <td>7 am to 6 pm</td> </tr> <tr> <td>Saturday</td> <td>8 am to 1 pm</td> </tr> <tr> <td rowspan="2">Operation</td> <td>Monday – Saturday</td> <td>7 am to 6 pm</td> </tr> <tr> <td>Sundays and Public Holidays</td> <td>8 am to 6 pm</td> </tr> </tbody> </table>	Activity	Day	Time	Earthworks and construction	Monday – Friday	7 am to 6 pm	Saturday	8 am to 1 pm	Operation	Monday – Saturday	7 am to 6 pm	Sundays and Public Holidays	8 am to 6 pm			
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Earthworks and construction	Monday – Friday	7 am to 6 pm															
	Saturday	8 am to 1 pm															
Operation	Monday – Saturday	7 am to 6 pm															
	Sundays and Public Holidays	8 am to 6 pm															

Item
Project Name: SSD 10446 Luddenham Resource Recovery Facility
Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B27	Works outside of the hours identified in condition B26 may be undertaken in the following circumstances: (a) works that are inaudible at the nearest sensitive receivers; (b) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or (c) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The auditees indicated that there have been no out of hours works during construction. The auditees indicated no complaints have been received in relation to the construction works.
Construction Noise Limits				
B28	The Development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009) (as may be updated or replaced from time to time). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures in the Appendix 2.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Noise and Vibration Management Plan Revision 4, dated 10/3/2025 Luddenham Quarry, Noise Compliance Report - July 2025, dated 16/07/2025 Sample service records and onboarding checklists where obtained for a concrete pump and boom, a lighting tower and a grader. 	C	Observations during the Audit site inspection and plant and equipment maintenance and onboarding records indicated that the mitigation measures in Appendix 2 of the consent were being implemented. Noise monitoring conducted on 7/7/2025 and 8/7/2025 at receivers R1 to R8 as part of Quarry operations requirements showed that noise levels from both Quarry activities and LRRF Construction remained below the Noise Management Levels (NMLs) adopted in the Construction Noise and Vibration Management Plan.
Construction Noise and Vibration Management Plan				
B29	The Applicant must prepare a Construction Noise and Vibration Management Plan for the Development to the satisfaction of the Planning Secretary. The Plan must form part of a CEMP in accordance with condition C2 and must: (a) be prepared by a suitably qualified and experienced noise expert; (b) be approved by the Planning Secretary prior to the commencement of construction of each stage of the Development; (c) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009) (as may be updated or replaced from time to time); (d) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; (e) include strategies that have been developed with the community for managing high noise generating works; (f) describe the community consultation undertaken to develop the strategies in condition B29(e); and (g) include a complaints management system that would be implemented for the duration of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Noise and Vibration Management Plan Revision 4, dated 10/3/2025 ER Endorsement Letter "SSD 10446 – Luddenham Resource Recovery Facility – Construction Traffic Management Plan (CTMP)", dated 26/03/2025. DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix C - the Construction Noise and Vibration Management Plan (CNVMP), in a letter dated 31/03/2025. Condition requirements are met in the CNVMP as follows: (a) Section 1.2 (b) Section 1.4 see DPHI approval letter dated 31/03/2025 (c) Section 5.1 (d) Section 5.2 (e) Sections 5.2 and 7 (f) Section 7 (g) Section 6.5
B30	The Applicant must: (a) not commence construction of any relevant stage of the Development until the Construction Noise and Vibration Management Plan required by condition B29 is approved by the Planning Secretary; and (b) implement the most recent version of the Construction Noise and Vibration Management Plan approved by the Planning Secretary for the duration of construction.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-122088 6:17 AM 22/05/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-128424 8:18 AM 30/05/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-132517 5:26 AM 06/06/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-135519 5:39 AM 13/06/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-148884 5:27 AM 04/07/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-152448 11:29 AM 10/07/2025 Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-84668 On 05/05/2025 Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-85295 On 06/05/2025 Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-97143 On 03/06/2025 Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-98825 On 06/06/2025 Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-108593 On 03/07/2025 Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-110144 On 08/07/2025 Luddenham Quarry, Noise Compliance Report - July 2025, dated 16/07/2025 Sample service records and onboarding checklists where obtained for a concrete pump and boom, a lighting tower and a grader. 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix C - the Construction Noise and Vibration Management Plan (CNVMP), in a letter dated 31/03/2025. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee The most recent version of the Construction Noise and Vibration Management Plan approved by the Planning Secretary is available on the project website Implementation is maintained through reminders briefings pre-start meetings and is monitored through weekly site inspections. Observations during the Audit site inspection and plant and equipment maintenance and onboarding records indicated that the mitigation measures were being implemented. Noise monitoring conducted on 7/7/2025 and 8/7/2025 at receivers R1 to R8 as part of Quarry operations requirements showed that noise levels from both Quarry activities and LRRF Construction remained below the Noise Management Levels (NMLs) adopted in the CNVMP.

Item
Project Name: SSD 10446 Luddenham Resource Recovery Facility
Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations																																																
Noise Mitigation at Residential Receivers																																																				
B31	<p>Prior to the commencement of operation of the Stage 1 Operations:</p> <p>(a) the Applicant must offer to enter into an agreement with the noise mitigation eligible receivers identified in Table 2 and identified in Figure 3 of Appendix 1 of this consent;</p> <p>(b) provide evidence to the Planning Secretary of the offer required by condition B31(a).</p> <p><i>Table 2 Residences Subject to Noise Mitigation Upon Request</i></p> <table border="1"> <thead> <tr> <th>Mitigation Basis</th> <th>Reference</th> <th>Land</th> </tr> </thead> <tbody> <tr> <td>Noise</td> <td>R3</td> <td>285 Adams Road, Luddenham</td> </tr> <tr> <td>Noise</td> <td>R6</td> <td>225 Adams Road, Luddenham</td> </tr> </tbody> </table>	Mitigation Basis	Reference	Land	Noise	R3	285 Adams Road, Luddenham	Noise	R6	225 Adams Road, Luddenham	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)																																							
Mitigation Basis	Reference	Land																																																		
Noise	R3	285 Adams Road, Luddenham																																																		
Noise	R6	225 Adams Road, Luddenham																																																		
B32	<p>If a negotiated noise agreement is established with the owners of the land identified in Table 2 under condition B31:</p> <p>(a) the limits do not apply to the noise mitigation eligible receivers in Table 2;</p> <p>(b) the Applicant must provide evidence that the noise agreement has been established to the Planning Secretary within one month of the agreement being reached.</p> <p><i>Note: At-property treatments for managing noise impacts may include measures such as the provision of mechanical ventilation and/or air-conditioning, upgrade of façade elements (including glazing, seals, doors and roof insulation), localised screening/barriers or a negotiated agreement with the affected parties.</i></p>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)																																																
Operational Noise Limits																																																				
B33	<p>The Applicant must ensure that noise generated by operation of the Development does not exceed the noise limits in Table 3 until such time the existing residential use ceases on the land or a development consent for non-residential uses applies to the land, whichever is the sooner.</p> <p><i>Table 3 Noise Limits (dB(A))</i></p> <table border="1"> <thead> <tr> <th>Reference</th> <th>Location</th> <th>Classification</th> <th>Day LAeq(15 minute)</th> </tr> </thead> <tbody> <tr> <td>R1</td> <td>2161 – 2177 Elizabeth Drive, Luddenham</td> <td>Residential</td> <td>43</td> </tr> <tr> <td>R2</td> <td>2111 – 2141 Elizabeth Drive, Luddenham</td> <td>Residential</td> <td>47</td> </tr> <tr> <td>R3</td> <td>285 Adams Road, Luddenham</td> <td>Residential</td> <td>62</td> </tr> <tr> <td>R4</td> <td>5 Anton Road, Luddenham</td> <td>Residential</td> <td>41</td> </tr> <tr> <td>R5</td> <td>185 Adams Road, Luddenham</td> <td>Residential</td> <td>40</td> </tr> <tr> <td>R6</td> <td>225 Adams Road, Luddenham</td> <td>Residential</td> <td>52</td> </tr> <tr> <td>R7</td> <td>161 Adams Road, Luddenham</td> <td>Residential</td> <td>37</td> </tr> <tr> <td>R8</td> <td>2510 – 2550 Elizabeth Drive, Luddenham</td> <td>Residential</td> <td>39</td> </tr> <tr> <td>AR1</td> <td>Hubertus Club Outdoor Open Spaces</td> <td>Active Recreation</td> <td>53 (when in use)</td> </tr> <tr> <th>Reference</th> <th>Location</th> <th>Classification</th> <th>Day LAeq(15 minute)</th> </tr> <tr> <td>C1</td> <td>Hubertus Club Restaurant</td> <td>Commercial</td> <td>63 (when in use)</td> </tr> </tbody> </table> <p><i>Note: Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Noise Policy for Industry (EPA, 2017) (as may be updated or replaced from time to time) and Approved Methods for the Measurement and Analysis of Environmental Noise in NSW (EPA, 2022) (as may be updated or replaced from time to time). Refer to the plan at Figure 3 in Appendix 1 for the general location of sensitive receivers.</i></p>	Reference	Location	Classification	Day LAeq(15 minute)	R1	2161 – 2177 Elizabeth Drive, Luddenham	Residential	43	R2	2111 – 2141 Elizabeth Drive, Luddenham	Residential	47	R3	285 Adams Road, Luddenham	Residential	62	R4	5 Anton Road, Luddenham	Residential	41	R5	185 Adams Road, Luddenham	Residential	40	R6	225 Adams Road, Luddenham	Residential	52	R7	161 Adams Road, Luddenham	Residential	37	R8	2510 – 2550 Elizabeth Drive, Luddenham	Residential	39	AR1	Hubertus Club Outdoor Open Spaces	Active Recreation	53 (when in use)	Reference	Location	Classification	Day LAeq(15 minute)	C1	Hubertus Club Restaurant	Commercial	63 (when in use)	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Reference	Location	Classification	Day LAeq(15 minute)																																																	
R1	2161 – 2177 Elizabeth Drive, Luddenham	Residential	43																																																	
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Item
Project Name: SSD 10446 Luddenham Resource Recovery Facility
Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B34	Notwithstanding condition B33, the Applicant must ensure that noise generated by operation of the Development does not exceed: (a) project amenity noise trigger levels at non-residential land uses specified in Section 2 of the NSW Noise Policy for Industry (EPA, 2017) when a non-residential land use is in use; and (b) traffic noise criteria for non-residential land uses and relative increase criteria specified in Section 2 of the NSW Road Noise Policy (EPA, 2011) when a non-residential land use is in use.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B35	If the Planning Secretary gives written approval for evening and night operation under condition A13, the Applicant must comply with the noise limits set as part of the written approval.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Operational Noise Management Plan				
B36	Prior to the commencement of Stage 1 Operations, the Applicant must prepare an Operational Noise Management Plan (ONMP) for the Development to the satisfaction of the Planning Secretary. The ONMP must form part of an OEMP in accordance with condition C5 and must: (a) be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary; (b) describe the measures to ensure: (i) compliance with the noise limits detailed in conditions B33 and B34; (ii) truck drivers are aware of vehicle noise mitigation and management measures, including a Driver Code of Conduct as required by condition B40; (iii) the deployment of contingency plans to minimise impacts should an exceedance of the noise limit (see B33 and B34) occur or appear likely to occur; and (c) include: (i) a complaints management system that would be implemented for the duration of the Development; and (ii) a protocol to evaluate the performance of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B37	The Applicant must: (a) not commence Stage 1 Operations until the ONMP is approved by the Planning Secretary; and (b) implement the most recent version of the ONMP approved by the Planning Secretary for the duration of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Post-Commissioning Noise Monitoring				
B38	Within three months of the commencement of Stage 1, Stage 2 and Stage 3 operations or within a timeframe as otherwise agreed with the Planning Secretary, a Post-Commissioning Noise Monitoring Report (PNMR) must be prepared in consultation with the EPA and to the satisfaction of Planning Secretary. The PNMR must: (a) be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary in accordance with: (i) the Australian Standard AS 1055:2018 Acoustics – Description and measurement of environmental noise (Standards Australia, 2018); (ii) the EPA Approved Methods for the Measurement and Analysis of Environmental Noise in NSW (EPA, 2022); and (iii) the NSW Noise Policy for Industry (EPA, 2017); (b) include: (i) details of the operating conditions and capacity of the Development during the noise monitoring period; (ii) an analysis of compliance with the noise limits specified in condition B33 and B34(a); (iii) an outline of management and mitigation measures to address any non-compliance with the limits specified in condition B33 and B34(a); and (iv) a description of contingency measures in the event the management and mitigation measures are not effective in reducing noise levels to meet the noise limits and timing for implementing and validating the effectiveness of these measures.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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Result	Comment
NC	Non compliant (NC)
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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Noise Verification Report				
B39	<p>Prior to the commencement of Stage 2 and Stage 3 operations, the Applicant must prepare and submit an Operational Noise Verification Report to the satisfaction of the Planning Secretary: The Operational Noise Verification Report must:</p> <p>(a) demonstrate that noise monitoring and verification has been carried out by a suitably qualified and experienced acoustic consultant in accordance with:</p> <p>(i) the Australian Standard AS 1055:2018 Acoustics – Description and measurement of environmental noise (Standards Australia, 2018);</p> <p>(ii) the EPA Approved Methods for the Measurement and Analysis of Environmental Noise in NSW (EPA, 2022); and</p> <p>(iii) the NSW Noise Policy for Industry (EPA, 2017);</p> <p>(b) include:</p> <p>(i) a source emission inventory developed from baseline on-site noise monitoring from the PNMR required by condition B38;</p> <p>(ii) noise modelling undertaken in accordance with the requirements in the latest versions of the EPA's Noise Policy for Industry (2017) and Australian Standard AS 1055:2018 Acoustics - Description and measurement of environmental noise using noise monitoring results provided in the PNMR required by condition B38;</p> <p>(iii) a verification of the predicted noise impacts of the Development for the next stage of operation, including identification of any additional at-source mitigation and management measures required to address any non-compliance with the noise limits specified in condition B33 and B34(a) and analysis of their effectiveness;</p> <p>(iv) a program to monitor and report on the effectiveness of the above measures; and</p> <p>(v) a description of contingency measures in the event at-source mitigation measures are not effective in reducing noise levels to an acceptable level.</p>	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Road Traffic Noise				
B40	<p>Prior to the commencement of construction of the Development, the Applicant must prepare a Driver Code of Conduct and induction training for the Development to minimise road traffic noise. The Applicant must update the Driver Code of Conduct and induction training for construction and operation and must implement the Code of Conduct for the life of the Development.</p>	<ul style="list-style-type: none"> • Luddenham Resource Recovery Facility Project website: https://luddenhamrecycling.com.au/ • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • CEMP Appendix J – Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446 Construction Traffic Management Plan (CTMP), Revision 6, dated 25/03/2025. • CTMP Appendix A – Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Driver Code Of Conduct, Revision 2, dated 11/03/2025. • ER Endorsement Letter "SSD 10446 – Luddenham Resource Recovery Facility – Construction Traffic Management Plan (CTMP)", dated 26/03/2025. • DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 • Texco Construction Site Specific Induction, Luddenham Recycling Park, 275 Adams Road Luddenham NSW • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-84668 On 05/05/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-85295 On 06/05/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-97143 On 03/06/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-98825 On 06/06/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-108593 On 03/07/2025 • Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-110144 On 08/07/2025 	C	<p>DPHI approved the Stage 2 CEMP & Sub-plans, which included the Construction Traffic Management Plan (CTMP) and within it Appendix A - Driver Code Of Conduct, in a letter dated 31/03/2025.</p> <p>Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee</p> <p>The most recent version of the (CTMP), including the Driver Code Of Conduct, approved by the Planning Secretary is available on the project website</p> <p>Section 11 of the construction site specific induction addresses the Driver Code Of Conduct, with further implementation maintained through reminder briefings in pre-start meetings.</p>

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NC	Non compliant (NC)
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Traffic Noise Verification Report				
B41	Prior to the commencement of Stage 2 and Stage 3 operations, the Applicant must prepare and submit a Traffic Noise Verification Report to the satisfaction of the Planning Secretary. The Traffic Noise Verification Report must: <ul style="list-style-type: none"> (a) demonstrate that noise monitoring and verification has been carried out by a suitably qualified and experienced acoustic consultant in accordance with: <ul style="list-style-type: none"> (i) the Australian Standard AS 1055:2018 Acoustics – Description and measurement of environmental noise (Standards Australia, 2018); (ii) the EPA NSW Road Noise Policy (EPA, 2011); and (iii) the TfNSW Road Noise Model Validation Guideline (TfNSW, 2022); and (b) include: <ul style="list-style-type: none"> (i) traffic noise monitoring data recorded at all noise sensitive receivers along Adams Road between the site access and The Northern Road prior to the commencement of Stage 1 operations; (ii) traffic noise monitoring data recorded at all noise sensitive receivers along Adams Road between the site access and The Northern Road at the time of preparing the traffic noise verification report; (iii) traffic count and traffic classification data collected during the noise monitoring period; (iv) traffic noise modelling undertaken using a suitable model identified in the NSW Road Noise Policy (EPA, 2011) that includes the traffic noise monitoring data recorded in accordance with clause (ii) above; (v) an analysis of any discrepancies between the predicted and actual impacts of the Development; (vi) an analysis of compliance with the noise criteria and relative increase criteria specified in the RTS and B34(b); (vii) an outline of at-source mitigation measures to be taken to address any exceedances identified in clause (vi) above; (viii) a program to monitor and report on the effectiveness of the above measures; and (ix) a description of contingency measures in the event at-source measures are not effective in reducing noise levels to an acceptable level. 	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B42	Despite the requirement for a Traffic Noise Verification Report in condition B41, the Applicant may seek written approval from the Planning Secretary to not carry out the Traffic Noise Verification Report if heavy vehicles associated with the Development are not utilising Adams Road between the site access and The Northern Road.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
VIBRATION				
Vibration Criteria				
B43	Vibration caused by construction and operation at any residence or structure immediately outside the site (including the Western Sydney Airport aviation fuel farm) must be limited to: <ul style="list-style-type: none"> (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time) (c) for vibration sensitive equipment, the generic vibration criterion (VC) curves set out in Generic Vibration Criteria for Vibration-Sensitive Equipment (Gordon, 1999). 	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Noise and Vibration Management Plan Revision 4, dated 10/3/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix C - the Construction Noise and Vibration Management Plan (CNVMP), in a letter dated 31/03/2025. Condition requirements are adopted in the CNVMP as follows: <ul style="list-style-type: none"> (a) Section 3.4.1 (b) Section 3.4.2 (c) Section 3.4.3 <p>The auditees indicated that there have been no complaints.</p>
B44	Vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition B43.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Noise and Vibration Management Plan Revision 4, dated 10/3/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix C - the Construction Noise and Vibration Management Plan (CNVMP), in a letter dated 31/03/2025. Condition requirements are adopted in Sections 3.4.4 and 4.3 of the CNVMP. <p>The auditees indicated that there has been no vibratory compaction within 30m of a structure.</p>
B45	The limits in conditions B43 and B44 apply unless otherwise outlined in a Construction or Operational Noise and Vibration Management Plan, approved as part of the CEMP required by condition C2 or the OEMP required by condition C5 of this consent.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Noise and Vibration Management Plan Revision 4, dated 10/3/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix C - the Construction Noise and Vibration Management Plan (CNVMP), in a letter dated 31/03/2025. Conditions B43 and B44 requirements are adopted in the CNVMP as noted above.

Item
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Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
AIR QUALITY				
Dust Minimisation				
B46	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 06/05/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 20/05/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 03/06/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 17/06/2025 	C	Dust suppression measures were observed during the site inspection including hoses, and water carts. Ground surfaces and stockpiles were wet and batters were generally well formed. Site accesses had speed restriction signage and were mainly constructed with hardstand, or stabilised with rumble grids in place and there was no appreciable tracking onto public roads. There were no fugitive dust emissions observed during the site inspection. ER inspection report observations are similar to those of the Audit site inspection
B47	During construction of the Development, the Applicant must ensure that: (a) exposed surfaces and stockpiles are suppressed by regular watering; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the Development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 06/05/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 20/05/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 03/06/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 17/06/2025 	C	Dust suppression measures were observed during the site inspection including hoses, and water carts. Ground surfaces and stockpiles were wet and batters were generally well formed. Site accesses were mainly constructed with hardstand, or stabilised with rumble grids in place and there was no appreciable tracking onto public roads. A street sweeper was observed on Adams road, betted the site access and Elizabeth Drive. There were no fugitive dust emissions observed during the site inspection. ER inspection report observations are similar to those of the Audit site inspection
Air Quality Discharges				
B48	The Applicant must install and operate equipment in line with best practice to ensure that the Development complies with all load limits, air quality criteria/air emission limits and air quality monitoring requirements as specified in the EPL applicable to the site.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B49	All non-road diesel plant and equipment utilised at the Development must achieve a particulate matter emission performance of 0.02 grams per kilowatt hour or less.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B50	All crushers and screens associated with material handling and processing operations must be fitted with water sprays to prevent or minimise air emissions.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025). The auditees noted that there is no intention of using crushers or screens during Construction.

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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Air Quality Management Plan				
B51	Prior to the commencement of Stage 1 Operations of the Development, the Applicant must prepare an Air Quality Management Plan (AQMP) to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by condition C5. The AQMP must: (a) be prepared by a suitably qualified and experienced person(s) whose appointment has been endorsed by the Planning Secretary; (b) detail and rank all emissions from all sources of the Development, including particulate emissions; (c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators; (d) identify the control measures that will be implemented for each emission source; and (e) nominate the following for each of the proposed controls: (i) key performance indicator; (ii) monitoring method; (iii) location, frequency and duration of monitoring; (iv) record keeping; (v) complaints register; (vi) response procedures; and (vii) compliance monitoring.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B52	The Applicant must: (a) not commence Stage 1 Operations until the Air Quality Management Plan required by condition B51 is approved by the Planning Secretary; and (b) implement the most recent version of the Air Quality Management Plan approved by the Planning Secretary for the duration of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Odour Management				
B53	The Applicant must ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B54	Storage of green/organic waste at the Development is limited to a maximum period of 72 hours.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
SOILS, WATER QUALITY AND HYDROLOGY				
Imported Soil				
B55	The Applicant must: (a) ensure that only VENM, ENM, or other material approved in writing by EPA is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Planning Secretary upon request.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The auditees noted that there has been no importation of fill materials and there is no intention of importing soil for Construction in the future

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Soil Washing				
B56	The washing of waste with treated water and/or wastewater is not permitted at the Development. The use of any other water to wash waste is not permitted at the Development unless expressly provided by a licence under the POEO Act.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Erosion and Sediment Control				
B57	Prior to the commencement of any construction or other surface disturbance for the Development, the Applicant must install suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the <i>Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book</i> (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre 275 Adams Road Luddenham NSW 2745, Erosion and Sediment Control Plan Revision 0, dated 08/11/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 06/05/2025 Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 20/05/2025 Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 03/06/2025 Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 17/06/2025 	C	Erosion and Sediment Controls observed during the site inspection and observations in ER inspection reports indicate that prior to commencement of construction suitable erosion and sediment control measures had been installed, in accordance with the relevant requirements of the <i>Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book</i> (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.
B58	The Applicant must maintain the erosion and sediment control measures installed on the site in accordance with condition B57 for the duration of construction and any other surface disturbance for the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre 275 Adams Road Luddenham NSW 2745, Erosion and Sediment Control Plan Revision 0, dated 08/11/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 06/05/2025 Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 20/05/2025 Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 03/06/2025 Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 17/06/2025 Rubicon Enviro Pty Ltd " Inspection Report – Texco – Luddenham Advanced Resource Recovery Facility", dated 28/07/2025 	C	<p>Erosion and Sediment Controls observed during the site inspection and observations in ER inspection reports indicate that erosion and sediment control measures installed are generally in accordance with the relevant requirements of the <i>Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book</i> (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2 (the ESCP).</p> <p>• IA1 – OFI01 Consistent with the requirements of Landcom 2004 the ESCP states that "<i>Overflows from the construction sediment basin to drain via large diameter sub-soil pipes installed under the access road, a reinforced concrete causeway, etc. The spillway arrangements and drainage path alignment to be determined on site.</i>" However, sediment basin overflow provisions consistent with the ESCP were not observed at the audit site inspection. A suitable means of drainage of overflow in over-design events needs to be constructed in accordance with Landcom 2004 (e.g. standard drawing SD 6-4 or equivalent) that minimises erosion and sediment transport to waterways during such events, and the ESCP should be updated as appropriate. Note that updates to the ESCP must continue to meet the requirements of Landcom 2004 for ESCPs (Sections 2.1 and 2.2).</p> <p>Since the audit site inspection the project took the following actions in response:</p> <ul style="list-style-type: none"> Engaged Rubicon Enviro Pty Ltd (Rubicon) to review site erosion and sediment controls Installed an emergency spillway on the northern side of the basin On 23 July a Rubicon CPESC (Mr Andrew Littlewood – Senior Soil Conservationist - CPESC No. 5988 & CESSWI No. 12101) inspected the site In relation to the subject basin, a site inspection report prepared by the CPESC (Rubicon, 28/7/25) states; "<i>We note that adjacent stormwater systems are now connected to the OSD basin. In addition, an emergency spillway was recently formed which will discharge spill flows to the adjacent Pond 2. The newly installed spillway is well constructed with plastic underlay and pinned geotextile with sediment fence installed along the spillway verges. The controls in the area remain functional, and no actions were required.</i>" <p>Based on the above reported actions the Auditor considers the finding has been adequately closed.</p>
Discharge Limits				
B59	The Development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre 275 Adams Road Luddenham NSW 2745, Erosion and Sediment Control Plan (ESCP) Revision 0, dated 08/11/2025, Appendix C Sediment Basin Management & Dewatering Procedure Sediment Basin Management and Discharge Record, 12/06/2025 	C	The Auditees indicated that during the audit period there was one discharge from the site sediment basin to the grassed area adjacent. The discharge permit recorded a pH of 7.4, turbidity level of 29 NTU and a Total Suspended Solids Concentration of 5.1 mg/l. which meet the criteria in Appendix C of the ESCP.

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Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Stormwater Management System				
B60	Prior to the commencement of construction of the Development, the Applicant must finalise the detailed design of the stormwater management system for the Development. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the EIS/RTS; (c) be in accordance with applicable Australian Standards; (d) ensure that the system capacity has been designed in accordance with <i>Australian Rainfall and Runoff</i> (Engineers Australia, 2016) and <i>Managing Urban Stormwater: Council Handbook</i> (EPA, 1997) guidelines; (e) ensure all water discharged to Oaky Creek is treated prior to discharge; (f) divert existing clean surface water around operational areas of the site; (g) direct all sediment laden water in overland flow away from the leachate management system; and (h) prevent cross-contamination of clean and sediment or leachate laden water.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 Darwing Package titled "Luddenham Recycle Centre Facility - Civil Siteworks Issued for Construction - Construction Certificate Package 1" dated 2/4/2025. 	C	Construction Certificate 1 (CC1) was issued in relation to "Bulk earthworks, warehouse structure (footings, precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, pump room only, associated with the construction and operation of a resource recovery facility with a capacity to accept and process up to 600,000 tonnes per annum of construction and demolition waste and commercial industrial waste." Civil works drawings submitted as part of CC1 include the design of stormwater management system.
B61	Prior to the commencement of Stage 1 Operations, the Applicant must install the stormwater management system in accordance with the finalised detailed design (as required by condition B60) and ensure the system is operational.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Water Management Plan				
B62	Prior to the commencement of Stage 1 Operations of the Development, the Applicant must prepare a Water Management Plan to the satisfaction of the Planning Secretary. The Water Management Plan must form part of the OEMP required by condition C5 and must: (a) be prepared by a suitably qualified and experienced person(s); (b) provide details of water use, metering, disposal and management on-site; (c) contain a Leachate Management Plan , including: (i) the management of wastewater streams on-site, including leachate; (ii) re-use of treated water on-site; and (iii) contingencies in the event the wastewater treatment plan is not operational; (d) contain a Surface Water Management Plan , including: (i) a program to monitor: i. surface water flows and quality; ii. surface water storage and use; and iii. sediment/detention basin operation; (ii) surface water impact assessment criteria, including trigger levels for investigating and potential adverse surface water impacts; and (iii) a protocol for the investigation and mitigation of identified exceedances of the surface water impact assessment criteria; and (e) contain an Irrigation Management Plan .	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B63	The Applicant must: (a) not commence Stage 1 Operations until the Water Management Plan required by condition B62 is approved by the Planning Secretary; and (b) implement the most recent version of the Water Management Plan approved by the Planning Secretary for the duration of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
WASTE MANAGEMENT				
Construction Waste Management				
B64	Prior to the commencement of construction of the Development, the Applicant must prepare a Construction Waste Management Plan for the Development to the satisfaction of the Planning Secretary. The Plan must form part of a CEMP in accordance with condition C2 and must: (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and (b) be implemented for the duration of construction works.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Waste Management Plan Revision 3, dated 10/3/2025 Trigalana Environmental (ER) letter "SSD 10446 – Luddenham Resource Recovery Facility – Construction Waste Management Plan (CWMP)", dated 10/03/2025, endorsing: Luddenham Advanced Resource Recovery Centre, Construction Waste Management Plan (Rev3). DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix E - the Construction Waste Management Plan (CWMP), in a letter dated 31/03/2025. Condition requirements are met in the CWMP as follows: (a) Sections 2.3 to 2.5 (b) Sections 1.2 and 3

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NC	Non compliant (NC)
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B65	The Applicant must: (a) not commence construction until the Construction Waste Management Plan is approved by the Planning Secretary. (b) implement the most recent version of the Construction Waste Management Plan approved by the Planning Secretary.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-122088 6:17 AM 22/05/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-128424 8:18 AM 30/05/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-132517 5:26 AM 06/06/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-135519 5:39 AM 13/06/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-148884 5:27 AM 04/07/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-152448 11:29 AM 10/07/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix E - the Construction Waste Management Plan (CWMP), in a letter dated 31/03/2025. Letter of notification dated 4/2/25 Notices of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee The most recent version of the Construction Waste Management Plan approved by the Planning Secretary is available on the project website Implementation is maintained through and monitored through weekly site inspections. The waste management contractor's report for the June 2025 period estimates a recycling rate of 90%
Waste Management Plan				
B66	Prior to the commencement of Stage 1 Operations of the Development, the Applicant must prepare a Waste Management Plan for the Development to the satisfaction of the Planning Secretary. The Waste Management Plan must form part of the OEMP and be prepared in accordance with condition C5. The Plan must: (a) be prepared in consultation with the EPA; (b) detail the type and quantity of waste to be generated during operation of the Development; (c) describe the handling, storage and disposal of all waste streams generated on site, consistent with the <i>Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014</i> and the <i>Waste Classification Guideline</i> (Environment Protection Authority, 2014); (d) detail the materials to be reused or recycled, either on or off site; (e) a description of procedures for dealing with non-conforming waste and materials received at the Development; (f) a description of how the EPA's record keeping and reporting requirements will be met; and (g) include the Management and Mitigation Measures included in Appendix 2.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B67	The Applicant must: (a) not commence Stage 1 Operations until the Waste Management Plan is approved by the Planning Secretary; (b) implement the most recent version of the Waste Management Plan approved by the Planning Secretary	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Waste Monitoring Program				
B68	From the commencement of Stage 1 Operations of the Development, the Applicant must implement a Waste Monitoring Program for the Development. The program must: (a) be prepared by a suitably qualified and experienced person(s) prior to the commencement of operation; (b) include suitable provision to monitor the: (i) quantity, type and source of waste received on site; and (ii) quantity, type and quality of the outputs produced on site; and (c) ensure that: (i) all waste that is controlled under a tracking system has the appropriate documentation prior to acceptance at the site; and (ii) staff receive adequate training in order to be able to recognise and handle any hazardous or other prohibited waste including asbestos.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Waste Reveal, Storage and Processing				
B69	The Applicant must ensure that only waste authorised for receipt by an EPL is received, stored and processed at the site.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B70	All loads of waste material must be covered at all times except during inspections carried out at the incoming weighbridge or unless otherwise agreed to in the approved FOD Management Plan required under condition B9.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B71	All waste must be loaded and unloaded within the designated loading and unloading areas.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B72	Waste must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B73	All non-conforming waste must be removed from the site immediately following inspection at the incoming weighbridge.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B74	Any stockpile at the Development must not exceed: (a) for non-combustible material, six metres in height; and (b) for combustible material, four metres in height and a maximum volume of 1,000 m3 in accordance with FRNSW Fire Safety Guideline – Fire Safety in Waste Facilities (FRNSW, 2020)	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B75	Permanent stockpile height markers must be installed and maintained at the Development. Markers must show the stockpile height limit of six metres and be positioned so that a visual check can be made of all stockpiles at the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

Item
Project Name: SSD 10446 Luddenham Resource Recovery Facility
Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Statutory Requirements				
B76	All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 EPL 20582 - Renier Recycling Asquith Pty Ltd, I-9 Brennan Close, Asquith, NSW 2077, issued 14/08/2015 EPL 12700 - Renier Recycling Camellia Pty Ltd, 16 Grand Avenue, Camellia, NSW 2142, issued 02/08/2007 	C	The auditees indicated and was observed by the auditor that construction waste materials were disposed for recycling by Renier Group. The Renier facilities are lawfully permitted to accept the materials in accordance with EPL 20582 and EPL 12700.
B77	The Applicant must assess and classify all non-liquid and liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a waste management facility or premises lawfully permitted to accept the waste.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	A review of the licences has
B78	The Applicant must retain all sampling and waste classification data for the life of the Development in accordance with the requirements of EPA.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The auditees indicated that during the audit period there was no waste generated that required classification, with only construction waste materials and office wastes generated and disposed for recycling.
B79	The requirements of any resource recovery order and exemption applicable to the waste at the resource recovery facility must be complied with at all times.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Pests, Vermin and Priority Weed Management				
B80	<p>The Applicant must:</p> <p>(a) implement suitable measures to manage pests, vermin and declared priority weeds on the site; and</p> <p>(b) inspect the site on a regular basis to ensure that these measures are working effectively, and that pests, vermin or priority weeds are not present on site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area</p> <p>Note: For the purposes of this condition, priority weed has the same definition of the term in the Biosecurity Act 2015.</p>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre, Biodiversity Management Plan Revision R5, dated 11/3/2025 Greater West Landscapes, Daily Works Form dated 29/01/25, recording weed management works Greater West Landscapes, Daily Works Form dated 25/02/25, recording weed management works Greater West Landscapes, Daily Works Form dated 09/04/25, recording weed management works Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-122088 6:17 AM 22/05/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-128424 8:18 AM 30/05/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-132517 5:26 AM 06/06/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-135519 5:39 AM 13/06/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-148884 5:27 AM 04/07/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-152448 11:29 AM 10/07/2025 	C	Weed management records and observations during the audit site inspection indicate that weeds were well managed and controlled, and measures relating to vermin and pathogens were consistent with Sections 4.7 to 4.10 of the Biodiversity Management plan.
HAZARDS AND RISK				
Dangerous Goods				
B81	The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department's <i>Hazardous and Offensive Development Application Guidelines – Applying SEPP 33</i> at all times.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Environmental Management Plan Revision 5, dated 25/3/2025 	C	Observations during the audit site inspection indicate that only small quantities of dangerous goods (mostly fuel) were stored and handled, and management measures in place were consistent with Section 3.1.11 of the Construction Environmental Management Plan.

Item
Project Name: SSD 10446 Luddenham Resource Recovery Facility
Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B82	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with: (a) all relevant Australian Standards; and (b) for liquids: (i) a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (ii) the NSW EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Manual</i>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Environmental Management Plan Revision 5, dated 25/3/2025 	C	Observations during the audit site inspection indicate that only small quantities of dangerous goods (mostly fuel) were stored (in 2 stores and small individually jerry cans) and handled, and management measures in place were consistent with Section 3.1.11 of the Construction Environmental Management Plan, which are in line with (a) and (b) of this Condition
B83	In the event of an inconsistency between the requirements of conditions B82(a) and B82(b), the most stringent requirement must prevail to the extent of the inconsistency.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Environmental Management Plan Revision 5, dated 25/3/2025 	C	Noted Observations during the audit site inspection indicate that only small quantities of dangerous goods (mostly fuel) were stored and handled, and management measures in place were consistent with Section 3.1.11 of the Construction Environmental Management Plan, which are in line with (a) and (b) of Condition B82
Bunding				
B84	The Applicant must store all chemicals, fuels and oils used on-site in appropriately banded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's <i>Storing and Handling of Liquids: Environmental Protection – Participants Manual</i> (Department of Environment and Climate Change, 2007).	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Environmental Management Plan Revision 5, dated 25/3/2025 Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-108593 On 03/07/2025 Luddenham Recycling Park Pre-Start Meeting (NSW) [EHSQ 9.21] MEET-110144 On 08/07/2025 	C	Observations during the audit site inspection indicate that only small quantities of fuel were stored in appropriately banded areas consistent with Section 3.1.11 of the Construction Environmental Management Plan, which is in line with Condition B84.
FIRE SAFETY				
B85	Prior to the commencement of Stage 1 Operations of the Development, the Applicant is to engage a fire safety engineer or other suitably qualified consultant to prepare the final fire safety design of the Development, including firewater containment, in consultation with FRNSW to the satisfaction of the Planning Secretary and include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of the National Construction Code.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B86	The Development must have appropriate fire services to be able to respond to a fire event in accordance with the <i>Fire Safety Guideline – Fire Safety in Waste Facilities</i> (FRNSW, 2020).	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B87	Prior to the commencement of Stage 1 Operations of the Development, the Applicant must prepare a comprehensive Emergency Response Plan (ERP) for the Development in consultation with FRNSW to the satisfaction of the Planning Secretary. The ERP must: (a) be prepared by a suitably qualified consultant; (b) specifically address foreseeable on-site and off-site fire events and other emergency incidents; (c) detail the appropriate risk control measures that would need to be implemented in order to safely mitigate potential risks to the health and safety of firefighters and other first responders (including electrical hazards); and (d) detail other risk control measures that could be implemented in a fire emergency caused by any unique hazards specific to the site.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
BUSHFIRE				
B88	From the commencement of construction and for the life of the Development, the entire property must be managed as an inner protection area in accordance with the requirements of Planning for Bushfire Protection 2019.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Environmental Management Plan Revision 5, dated 25/3/2025 	C	Observations during the audit site inspection indicate that site has been prepared and managed consistent with an inner protection area, with no trees or natural combustible material present within the construction footprint.

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Result	Comment
NC	Non compliant (NC)
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B89	All new construction must comply with: (a) Section 3 and Section 9 (BAL FZ) of Australian Standard AS3959-2018 'Construction of building in bushfire-prone areas' or the relevant BAL-FZ requirements of the 'NASH Standard – Steel Framed Construction in Bushfire Areas' (incorporating amendment A – 2015); and (b) the construction requirements for BAL FZ in Section 7.5 of Planning for Bush Fire Protection 2019.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	<p>The auditees indicated construction during the audit period has not involved alterations of structures. Construction Certificate 1 (CC1) was issued in relation to "Bulk earthworks, warehouse structure (footings, precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, pump room only, associated with the construction and operation of a resource recovery facility with a capacity to accept and process up to 600,000 tonnes per annum of construction and demolition waste and commercial industrial waste."</p> <p>CC1 lists in documentation relied upon: 21 - Letter: Fire Engineering Report Not Applicable to CC1 Works – Core Engineering Group, dated 08/04/2025. This document states "there are no requirements of the project FER (Our ref: F202199_FER_03, dated 05/08/24) which are applicable to the proposed early works forming part of Construction Certificate 1. The scope of this Construction Certificate is warehouse structure (precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, and pump room."</p> <p>The above indicates that the requirements of this condition will be addressed in future Construction Certificates</p>
B90	Property access roads must comply with the requirements of Table 7.4a of Planning for Bush Fire Protection 2019.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	<p>The auditees indicated construction during the audit period has not involved alterations of structures. Construction Certificate 1 (CC1) was issued in relation to "Bulk earthworks, warehouse structure (footings, precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, pump room only, associated with the construction and operation of a resource recovery facility with a capacity to accept and process up to 600,000 tonnes per annum of construction and demolition waste and commercial industrial waste."</p> <p>CC1 lists in documentation relied upon: 21 - Letter: Fire Engineering Report Not Applicable to CC1 Works – Core Engineering Group, dated 08/04/2025. This document states "there are no requirements of the project FER (Our ref: F202199_FER_03, dated 05/08/24) which are applicable to the proposed early works forming part of Construction Certificate 1. The scope of this Construction Certificate is warehouse structure (precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, and pump room."</p> <p>The above indicates that the requirements of this condition will be addressed in future Construction Certificates</p>
B91	The provision of water, electricity and gas must comply with Table 5.3c of Planning for Bush Fire Protection 2019.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Construction Certificate 1, Certificate No. CC-24010, determined 24/04/25 Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	<p>The auditees indicated construction during the audit period has not involved alterations of structures. Construction Certificate 1 (CC1) was issued in relation to "Bulk earthworks, warehouse structure (footings, precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, pump room only, associated with the construction and operation of a resource recovery facility with a capacity to accept and process up to 600,000 tonnes per annum of construction and demolition waste and commercial industrial waste."</p> <p>CC1 lists in documentation relied upon: 21 - Letter: Fire Engineering Report Not Applicable to CC1 Works – Core Engineering Group, dated 08/04/2025. This document states "there are no requirements of the project FER (Our ref: F202199_FER_03, dated 05/08/24) which are applicable to the proposed early works forming part of Construction Certificate 1. The scope of this Construction Certificate is warehouse structure (precast concrete walls, structural steel, roof cladding, slabs), boundary retaining walls, façade, civil and stormwater works, in-ground hydraulic services, and pump room."</p> <p>The above indicates that the requirements of this condition will be addressed in future Construction Certificates</p>
B92	Prior to the commencement of Stage 1 Operations of the Development, a Bush Fire Emergency Management and Evacuation Plan must be prepared. The Plan must: (a) be consistent with the document: 'A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan' (NSW Rural Fire Service, 2014); (b) include planning for the early relocation of occupants; and (c) be provided to the Local Emergency Management Committee for its information prior to the commencement of Stage 1 Operations of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B93	The Applicant must: (a) not commence Stage 1 Operations until the Bush Fire Emergency Management and Evacuation Plan is approved by the Planning Secretary; and (b) implement the most recent version of the Bush Fire Emergency Management and Evacuation Plan approved by the Planning Secretary for the duration of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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Result	Comment
NC	Non compliant (NC)
C	Compliant
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
ABORIGINAL HERITAGE				
Statutory Requirements				
Aboriginal Cultural Heritage Management Plan (ACHMP)				
B94	Before the commencement of any clearing or construction works for the Development, the Applicant must prepare an ACHMP for the Development. The plan must form part of the CEMP required by condition C2 and must: (a) be prepared by a suitably qualified and experienced expert in consultation with the Registered Aboriginal Parties; (b) be submitted to the satisfaction of the Planning Secretary prior to construction of any part of the Development; (c) describe the measures to protect the AHIMS site #45-5-2280 in perpetuity; (d) describe the measures to salvage the artefacts in at AHIMS site #45-5-5360, including mapping, analysis and collection, and protect them in perpetuity; (e) include: (i) details of an Aboriginal cultural heritage interpretation strategy; and (ii) the Management and Mitigation Measures included in Appendix 2 of this consent.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre, Aboriginal Cultural Heritage Management Plan Revision 4, dated 06/3/2025 Trigalana Environmental letter "SSD 10446 – Luddenham Resource Recovery Facility", dated 30/01/2025, endorsing: Luddenham Advanced Resource Recovery Centre, Construction Environmental Management Plan (Rev3), Community Consultation Plan (Rev2), Construction Noise and Vibration Management Plan (Rev3), Construction Waste Management Plan (Rev2), Erosion and Sediment Control Plan (Rev0), Construction Traffic Management Plan (Rev3), Aboriginal Cultural Heritage Management Plan (Rev3), and Biodiversity Management Plan (Rev4). DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix F - the Aboriginal Cultural Heritage Management Plan (ACHMP), in a letter dated 31/03/2025. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee Condition requirements are met in the ACHMP as follows: (a) Sections 1.5 (b) See above for commencement of construction and DPHI approval (c) Section 7.1 (d) Sections 5.2, 7.5 and 7.6 (e) (i) Section 8 (ii) Section 6
B95	The Applicant must: (a) not commence construction until the ACHMP is approved by the Planning Secretary; and (b) implement the most recent version of the ACHMP approved by the Planning Secretary for the duration of the Development.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-122088 6:17 AM 22/05/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-128424 8:18 AM 30/05/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-132517 5:26 AM 06/06/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-135519 5:39 AM 13/06/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-148884 5:27 AM 04/07/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-152448 11:29 AM 10/07/2025 Texco Construction Site Specific Induction, Luddenham Recycling Park, 275 Adams Road Luddenham NSW 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix F - the Aboriginal Cultural Heritage Management Plan (ACHMP), in a letter dated 31/03/2025 Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee The most recent version of the Aboriginal Cultural Heritage Management Plan approved by the Planning Secretary is available on the project website Section 15 of the construction site specific induction addresses Aboriginal Cultural Heritage management. Implementation is maintained and monitored through weekly site inspections.
Unexpected Finds Protocol				
B96	If any item or object of Aboriginal heritage significance is identified on site: (a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately; (b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and (c) Heritage NSW must be contacted immediately.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Texco Construction Site Specific Induction, Luddenham Recycling Park, 275 Adams Road Luddenham NSW 	NT	The auditee indicated that there have been no Unexpected finds nor any finds of Aboriginal heritage significance during the audit period Section 7.3 of the ACHMP - includes an unexpected finds protocol Section 15 of the construction site specific induction addresses Aboriginal Cultural Heritage finds.
B97	Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the <i>National Parks and Wildlife Act 1974</i> .	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The auditee indicated that there have been no Unexpected finds nor any finds of Aboriginal heritage significance during the audit period Section 7.3 of the ACHMP - includes an unexpected finds protocol Section 15 of the construction site specific induction addresses Aboriginal Cultural Heritage finds.
HISTORIC HERITAGE				
Unexpected Finds Protocol				
B98	If any archaeological relics are uncovered during the course of the work, then all works must cease immediately in that area and work in the immediate vicinity of the Aboriginal item or object may only recommence subject to approval from the E&H Group.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Texco Construction Site Specific Induction, Luddenham Recycling Park, 275 Adams Road Luddenham NSW 	NT	The auditee indicated that there have been no Unexpected finds and no archaeological relics have been uncovered during the audit period Section 15 of the construction site specific induction addresses Heritage finds.
BIODIVERSITY				
B99	Prior to the commencement of construction, the Applicant must purchase and retire the number and class of ecosystem credits and species credits set out in the BAM Biodiversity Credit Report in Appendix E of the Revised Biodiversity Development Assessment Report, prepared by EMM Consulting Pty Ltd dated 28 April 2021. The retirement of biodiversity credits must be carried out in accordance with the NSW Biodiversity Offsets Scheme of the <i>Biodiversity Conservation Act 2016</i> .	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Biodiversity Conservation Trust "Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation" BCT Reference BCF810, dated 10/01/2025 Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. 	C	Biodiversity Conservation Trust "Statement confirming payment into the Biodiversity Conservation Fund for an offset obligation" confirms retirement of the number and class of ecosystem credits and species credits required by the condition is dated 10/01/2025. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee

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Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B100	Prior to commencement of construction, evidence of the retirement of credits in satisfaction of condition B99 must be provided to the Planning Secretary.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Post Approval Form of 13/01/2025, submission of BCF810 - Statement confirming payment as required by Condition B100. Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. 	C	Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee Post Approval Form of 13/01/2025 acknowledging submission of BCF810 - Statement confirming payment as required by Condition B100.
Biodiversity Management Plan				
B101	Prior to clearing for construction of the Development, the Applicant must prepare a Biodiversity Management Plan (BMP) for the Development in consultation with the E&H Group to the satisfaction of the Planning Secretary. The Biodiversity Management Plan must be approved by the Planning Secretary prior to the commencement of clearing for construction and must form part of the CEMP in accordance with condition C2. The Plan must include the following: (a) be prepared by a suitably qualified and experienced ecologist; (b) be prepared in consultation with the E&H Group; (c) include: (i) a description of the environmental management framework that would be implemented to manage biodiversity impacts; (ii) details of who would be responsible for monitoring, reviewing, and implementing the plan; (iii) a program to monitor and report on the effectiveness of the above measures which includes tailored, quantitative performance measures and targets, completion criteria, monitoring and trigger points for corrective action which adhere to the SMART principles (specific, measurable, achievable, realistic, timely); and (iv) revegetation of the riparian zone of Oaky Creek.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre, Biodiversity Management Plan Revision R5, dated 11/3/2025 Trigalana Environmental letter "SSD 10446 – Luddenham Resource Recovery Facility – Biodiversity Management Plan (BMP)" , dated 11/03/2025, endorsing: Luddenham Advanced Resource Recovery Centre, Biodiversity Management Plan (Rev5). DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025. Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix I - the Biodiversity Management Plan (BMP), in a letter dated 31/03/2025. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee Condition requirements are met in the ACHMP as follows: (a) Signature page (b) Section 1.6.2 (c) (i) Sections 3 and 4 (ii) Section 4.10 and 5 (iii) Section 5 (iv) Section 4.1, and figures 1.3 and 2.1
B102	The Applicant must: (a) not commence any clearing or construction of the Development until the Biodiversity Management Plan is approved by the Planning Secretary; and (b) implement the most recent version of the Biodiversity Management Plan approved by the Planning Secretary.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-122088 6:17 AM 22/05/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-128424 8:18 AM 30/05/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-132517 5:26 AM 06/06/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-135519 5:39 AM 13/06/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-148884 5:27 AM 04/07/2025 Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-152448 11:29 AM 10/07/2025 Texco Construction Site Specific Induction, Luddenham Recycling Park, 275 Adams Road Luddenham NSW East Coast Ecology, Pre-Clearing Survey Report, Luddenham Advanced Resource Recovery Centre Version v1.0, dated 13/05/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix I - the Biodiversity Management Plan (BMP), in a letter dated 31/03/2025. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee The Pre-Clearing Survey Report dated 13/05/2025 indicates clearing started after 01/05/2025 - the date of the onsite pre-clearing survey work. The most recent version of the Biodiversity Management Plan approved by the Planning Secretary is available on the project website Section 13 of the construction site specific induction addresses management biodiversity finds. Implementation is maintained and monitored through weekly site inspections.
Unexpected Finds				
B103	Prior to the commencement of construction, the Applicant must prepare an unexpected contamination finds procedure to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the of the CEMP in accordance with condition C2 and must ensure any material identified as contaminated is disposed of in accordance with the POEO Act and its associated regulations. Details of the final disposal location and the results of any associated testing must be submitted to the Planning Secretary prior to removal of the contaminated material from the site.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Environmental Management Plan Revision 5, dated 25/3/2025 	C	Section 3.11.1 and Appendix B of the Construction Environmental Management Plan (Dated 25/03/2025) (Rev 5) address contamination and include an Unexpected Contamination Finds Protocol The auditees indicated that there were no unexpected contamination findings during the audit period.
VISUAL AMENITY				
Landscaping				
B104	Prior to the commencement of Stage 1 Operations of the Development, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping works on-site, to the satisfaction of the Planning Secretary and in consultation with the Western Sydney Airport. The plan must form part of an OEMP in accordance with condition C5. The plan must: (a) detail the species to be planted on-site; (b) describe the monitoring and maintenance measures to manage revegetation and landscaping works; and (c) be consistent with the Applicant's Management and Mitigation Measures at Appendix 2.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

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Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B105	The Applicant must: (a) not commence Stage 1 Operations until the Landscape Management Plan is approved by the Planning Secretary. (b) must implement the most recent version of the Landscape Management Plan approved by the Planning Secretary; and (c) maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition B104 for the life of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Lighting				
B106	The Applicant must ensure the lighting associated with the Development: (a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 2019); (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network; and (c) is designed to comply with the requirements of National Airports Safeguarding Framework Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	C	The auditees indicated and the it was observed during the audit site inspection that lighting is used up to 5 pm and from 7am only and luminaires are directed away from residents and out of sight of roads. Only construction lighting installed and in use and Western Sydney Airport not in operation.
Signage and Fencing				
B107	All signage must be erected in accordance with the Development plans included in the EIS and RTS.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
B108	All fencing must be erected in accordance with the design approved in the FOD Management Plan required by condition B9. <i>Note: These conditions do not apply to temporary construction and safety related signage and fencing.</i>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
COMMUNITY ENGAGEMENT				
B109	The Applicant must consult with the community regularly throughout the Development, including consultation with the nearby sensitive receivers identified on Figure 3 in Appendix 1 of this consent, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders.	<ul style="list-style-type: none"> Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Luddenham Advanced Resource Recovery Centre, Community Consultation Plan Revision 3, dated 13/3/2025 DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 Luddenham ARRC Complaints Register to 9/7/2025 Project Update Luddenham Advanced Resource Recovery Centre (ARRC), April – May 2025 Project Update Luddenham Advanced Resource Recovery Centre (ARRC), June – July 2025 Coombes Stakeholder Database Sod ceremony June 2025 attendance list. 	C	Within the Community Consultation Plan (CCP) Section 5.3 outlines general stakeholder consultation and Section 6.3 outlines consultation activities with sensitive receivers. The auditees indicated that out of hours or activities resulting in nuisance or impact to receivers or stakeholders have not occurred during the audit period therefore associated specific consultation activities within the CCP have not been triggered. As a result Consultation activities have comprised of Community Notifications published on the project Website . This will continue to be the case until road upgrades commence and or out of hour works or high noise impact activities occur. The Auditees also indicated that a welcome to country ceremony was held with Registered Aboriginal Parties and other interested stakeholders, as well as Sod Turning event, which various stakeholders and Registered Aboriginal Parties attended. The auditees and the complaints register for the project indicate that there have been no complaints during the audit period.

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Result	Comment
NC	Non compliant (NC)
C	Compliant
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Community Consultation Plan				
B110	The Applicant must prepare a Community Consultation Plan for the Development, to the satisfaction of the Planning Secretary. The Plan must: (a) be approved by the Planning Secretary prior to the commencement of site preparation works; (b) be implemented for the life of the Development, or as otherwise agreed by the Planning Secretary; (c) assign a central contact person to keep the nearby sensitive receivers regularly informed throughout the Development; (d) detail the mechanisms for regularly consulting with the local community throughout the Development, such as holding regular meetings to inform the community of the progress of the Development and report on environmental monitoring results; (e) detail a procedure for consulting with nearby sensitive receivers: (i) to schedule high noise generating works, vibration intensive activities or manage traffic disruptions during construction; and (ii) regarding operational noise and traffic management; (f) include contact details for key community groups, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders; and (g) include a complaints procedure for recording, responding to and managing complaints, including: (i) email, toll-free telephone number and postal address for receiving complaints; (ii) advertising the contact details for complaints prior to and during operation, via the local newspaper and through on-site signage; (iii) a complaints register to record the date, time and nature of the complaint, details of the complainant and any actions taken to address the complaint; and (iv) procedures to resolve any disputes that may arise during the course of the Development.	<ul style="list-style-type: none"> • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Luddenham Advanced Resource Recovery Centre, Community Consultation Plan Revision 3, dated 13/3/2025 • Trigalana Environmental letter "SSD 10446 – Luddenham Resource Recovery Facility" , dated 30/01/2025, endorsing: Luddenham Advanced Resource Recovery Centre, Construction Environmental Management Plan (Rev3), Community Consultation Plan (Rev2), Construction Noise and Vibration Management Plan (Rev3), Construction Waste Management Plan (Rev2), Erosion and Sediment Control Plan (Rev0), Construction Traffic Management Plan (Rev3), Aboriginal Cultural Heritage Management Plan (Rev3), and Biodiversity Management Plan (Rev4). • DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025. • Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. 	C	Condition requirements are met in the CCP as follows: (a) DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix H - the Community Consultation Plan (CCP), in a letter dated 31/03/2025. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee (b) Section 2 (c) Section 3 (d) Sections 5.2 and 6 (e) (i) Section 6.3 (ii) Section 6.3 (f) Section 5.1 and Appendix 1 (g) (i) Section 8 (ii) Section 8 (iii) Section 8 (iv) Section 8
B111	(a) not commence construction until the Community Consultation Plan is approved by the Planning Secretary; and (b) implement the approved Community Consultation Plan for the duration of the Development.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Luddenham Advanced Resource Recovery Centre, Community Consultation Plan Revision 3, dated 13/3/2025 • DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 • Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-122088 6:17 AM 22/05/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-128424 8:18 AM 30/05/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-132517 5:26 AM 06/06/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-135519 5:39 AM 13/06/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-148884 5:27 AM 04/07/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-152448 11:29 AM 10/07/2025 • Luddenham ARRC Complaints Register to 9/7/2025 	C	DPHI approved the Stage 2 CEMP & Sub-plans, which included Appendix I - the Community Consultation Plan (CCP), in a letter dated 31/03/2025. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee The most recent version of the Community Consultation Plan approved by the Planning Secretary is available on the project website Implementation is maintained and monitored through weekly site inspections - community relations and activities that may cause nuisance. The auditees and the complaints register for the project indicate that there have been no complaints during the audit period.

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Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
PART C				
ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
ENVIRONMENTAL MANAGEMENT				
Management Plan Requirements				
C1	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <p>(a) detailed baseline data;</p> <p>(b) details of:</p> <p>(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);</p> <p>(ii) any relevant limits or performance measures and criteria; and</p> <p>(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures;</p> <p>(c) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;</p> <p>(d) a program to monitor and report on the:</p> <p>(i) impacts and environmental performance of the Development; and</p> <p>(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;</p> <p>(e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the Development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <p>(i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);</p> <p>(ii) complaint;</p> <p>(iii) failure to comply with statutory requirements; and</p> <p>(h) a protocol for periodic review of the plan.</p> <p>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	<ul style="list-style-type: none"> • Interview with ER 07/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Various Trigalana Environmental letters "SSD 10446 – Luddenham Resource Recovery Facility", dated 30/01/2025 to 26/3/2025, providing Er endorsement of Luddenham Advanced Resource Recovery Centre, Construction Environmental Management Plan and subplans (Appendices) • DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 	C	Management plans required under this consent were endorsed by the ER and approved by the Planning Secretary as being in accordance with the conditions.
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN				
C2	The Applicant must prepare a Construction Environmental Management Plan (CEMP) for the Development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	<ul style="list-style-type: none"> • Interview with ER 07/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Trigalana Environmental letter "SSD 10446 – Luddenham Resource Recovery Facility", dated 30/01/2025, endorsing: Luddenham Advanced Resource Recovery Centre, Construction Environmental Management Plan (Rev3), Community Consultation Plan (Rev2), Construction Noise and Vibration Management Plan (Rev3), Construction Waste Management Plan (Rev2), Erosion and Sediment Control Plan (Rev0), Construction Traffic Management Plan (Rev3), Aboriginal Cultural Heritage Management Plan (Rev3), and Biodiversity Management Plan (Rev4). • Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Environmental Management Plan Revision 5, dated 25/3/2025 • DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 	C	Construction Environmental Management Plan (Rev5), dated 25/03/2025 DPHI approved the Stage 2 CEMP & Sub-plans in a letter dated 31/03/2025.
C3	As part of the CEMP required under condition C2 of this consent, the Applicant must include the following:	<ul style="list-style-type: none"> • Luddenham Resource Recovery Facility Project website: https://luddenhamrecycling.com.au/ • Interview with ER 07/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • CEMP Appendix J – Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446 Construction Traffic Management Plan, Revision 6, dated 25/03/2025. • CEMP Appendix D – Luddenham Advanced Resource Recovery Centre 275 Adams Road Luddenham NSW 2745, Erosion and Sediment Control Plan Revision 0, dated 08/11/2025 • CEMP Appendix C – Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Noise and Vibration Management Plan Revision 4, dated 10/3/2025 • CEMP Appendix E – Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Waste Management Plan Revision 3, dated 10/3/2025 • CEMP Appendix H - Luddenham Advanced Resource Recovery Centre, Community Consultation Plan Revision 3, dated 13/3/2025 • DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 	C	Construction Environmental Management Plan (Rev5), dated 25/03/2025, appendices C, D, E, H and J. DPHI approved the Stage 2 CEMP & Sub-plans in a letter dated 31/03/2025

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Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C4	The Applicant must: (a) not commence construction of the Development until the CEMP is approved by the Planning Secretary; and (b) carry out the construction of the Development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.	<ul style="list-style-type: none"> • Interview with ER 07/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • DPHI CEMP & Sub-plan approval letter: Approval of the Construction Environmental Management Plan – Luddenham Resource Recovery Facility, dated 31/03/2025 • Coombes PG Notification of Commencement of Construction Works, dated 04/02/2025. • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 06/05/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 20/05/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 03/06/2025 • Trigalana Environmental " Luddenham ARRC – Environmental Inspection Report", dated 17/06/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-122088 6:17 AM 22/05/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-128424 8:18 AM 30/05/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-132517 5:26 AM 06/06/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-135519 5:39 AM 13/06/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-148884 5:27 AM 04/07/2025 • Luddenham Recycling Park Inspection Details - All Details for Weekly Environmental Inspection [EHSQ 9.28] ISP-152448 11:29 AM 10/07/2025 • Texco Construction Site Specific Induction, Luddenham Recycling Park, 275 Adams Road Luddenham NSW 	C	DPHI approved the Stage 2 CEMP & Sub-plans in a letter dated 31/03/2025. Letter of notification dated 4/2/25 Notifies of commencement on 14/03/25, with commencement on 1/5/25 as indicated by the auditee. ER inspection reports indicate compliance with the CEMP, and weekly contractor site inspections and the contractor site induction address implementation of the requirements of the CEMP and sub-plans.
OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN				
C5	The Applicant must prepare an Operational Environmental Management Plan (OEMP) for the Development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
C6	As part of the OEMP required under condition C5 of this consent, the Applicant must include the following: (a) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development; (b) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and (c) include the following environmental management plans: (i) Traffic (see condition B22); (ii) Noise (see condition B36); (iii) Air Quality (see condition B51); (iv) Water (see condition B62); (v) Wildlife Strike Management (see condition B7) (vi) Foreign Object Debris (see condition B9); (vii) Waste (see condition B66); (viii) Emergency Response Plan (see condition B87); (ix) Bushfire (see condition B92); (x) Aboriginal Cultural Heritage (see condition B94); and (xi) Biodiversity (see condition B101).	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
C7	The Applicant must: (a) not commence operation of any stage until the OEMP is approved by the Planning Secretary; and (b) operate the Development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).	<ul style="list-style-type: none"> • Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 • Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)

Item
Project Name: SSD 10446 Luddenham Resource Recovery Facility
Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
DECOMMISSIONING				
C8	Three months prior to decommissioning the Development under condition A7, the Applicant must prepare a Decommissioning Management Plan for the Development. The Plan must be approved by the Planning Secretary prior to the commencement of decommissioning activities and include: (a) a schedule of activities for the orderly decommissioning of the Development; (b) measures to mitigate any environmental impacts associated with the decommissioning of the Development (c) details of waste management and disposal; and (d) procedures for notification of the public, the Department and other relevant Government authorities, of the decommissioning.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025). No Commissioning scheduled within 3 months
REVISION OF STRATEGIES, PLANS AND PROGRAMS				
C9	Within three months of: (a) the submission of a Compliance Report under condition C15; (b) the submission of an incident report under condition C11; (c) the submission of an Independent Audit under condition C17; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review.	<ul style="list-style-type: none"> Interview with ER 07/07/2025 Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The Auditees indicated that none of the events listed occurred this audit period.
C10	If necessary to either improve the environmental performance of the Development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review required under condition C8, or such other timing as agreed by the Planning Secretary. <i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the Development.</i>	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with ER 07/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The Auditees indicated that during the audit Period there were no occurrences or finding necessitating modification to environmental management documents.
REPORTING AND AUDITING				
Incident Notification, Reporting and Response				
C11	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the Development (including the development application number and the name of the Development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 3.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with ER 07/07/2025 	NT	The Auditees indicated that there were no reportable or other incidents this audit period.
Non-Compliance Notification				
C12	The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with ER 07/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The Auditees indicated that there were not aware of any non-compliances during the audit period.
C13	A non-compliance notification must identify the Development and the application number for it, set out the condition of consent that the Development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with ER 07/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Refer to condition C11 above.
C14	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	The Auditees indicated that there were not aware of any non-compliances or reportable incidents during the audit period.

Item
Project Name: SSD 10446 Luddenham Resource Recovery Facility
Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Compliance Reporting				
C15	Within six months after the commencement of Stage 1 Operations of the Development, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary), the Applicant must submit a Compliance Report to the Planning Secretary reviewing the environmental performance of the Development to the satisfaction of the Planning Secretary. Compliance Reports must be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) and must also: (a) identify any trends in the monitoring data over the life of the Development; (b) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (c) describe what measures will be implemented over the next year to improve the environmental performance of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
C16	The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Planning Secretary and notify the Planning Secretary in writing at least seven days before this is done.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	Operational requirement. Development under construction only during this audit period (01/05/2025 to 09/07/2025)
Independent Audit				
C17	The Applicant must commission and pay the full cost of an Independent Environmental Audit (Audit) of the Development. Audits must: (a) be prepared in accordance with the Independent Audit Post Approval Requirements (Department 2020); (b) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary; and (c) be documented in an Independent Audit Report and submitted to the satisfaction of the Planning Secretary within three months of commissioning the Audit (or within another timeframe agreed by the Planning Secretary).	<ul style="list-style-type: none"> DPHI Independent Audit Post Approval Requirements, 2020 This audit (IA#1 SSI-8863, dated 14/5/2025) Auditor Declaration of Independence Form, SSI-8863, Swathi Gowda, Rui Henriques DPHI Letter, Luddenham Resource Recovery Facility - Appointment of Experts, Ref: SSD-10446-PA-15, dated 06/05/2025 	C	This Audit (LRRF IA#1) is being conducted within 12 weeks of commencement of Construction in accordance with the IAPAR (Department 2020) The Audit team was endorsed by the Planning Secretary on 06/06/2025
C18	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C17 of this consent; (b) submit the response to the Planning Secretary, Council and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations; (c) implement the recommendations to the satisfaction of the Planning Secretary; and (d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	NT	No previous Audits to date. This Audit LRRF IA#1, is the initial audit
Monitoring and Environmental Audits				
C19	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing. Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the Development to provide data on compliance with the consent or on the environmental impact of the Development, and an "environmental audit" is a periodic or particular documented evaluation of the Development to provide information on compliance with the consent or the environmental management or impact of the Development.	<ul style="list-style-type: none"> Audit site inspection with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 CEMP Appendix J – Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446 Construction Traffic Management Plan, Revision 6, dated 25/03/2025. CEMP Appendix D – Luddenham Advanced Resource Recovery Centre 275 Adams Road Luddenham NSW 2745, Erosion and Sediment Control Plan Revision 0, dated 08/11/2025 CEMP Appendix C – Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Noise and Vibration Management Plan Revision 4, dated 10/3/2025 CEMP Appendix E – Luddenham Advanced Resource Recovery Centre (Lot 3 DP 623799) SSD 10446, Construction Waste Management Plan Revision 3, dated 10/3/2025 CEMP Appendix H - Luddenham Advanced Resource Recovery Centre Concrete truck logs - 12/06/2025 to 09/07/2025 Waste truck logs - 14/05/2025 to 21/06/2025 	C	Noted - for the Audit period monitoring requirements within the various plans have been limited to heavy vehicle movements.

Item
Project Name: SSD 10446 Luddenham Resource Recovery Facility
Auditee/ Client: Texco Construction / The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Lead Auditor: Rui Henriques
Audit Details: Construction IA 1
HBI Project No. 250410_Coombes_Luddenham Resource Recovery Facility_AUDIT

Result	Comment
NC	Non compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
ACCESS TO INFORMATION				
C20	At least 48 hours before the commencement of construction of the Development and for the life of the Development (or such other time as agreed by the Planning Secretary), the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in condition A2 of this consent; (ii) all current statutory approvals for the Development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) the proposed staging plans for the Development if the construction, operation or decommissioning of the Development is to be staged; (v) regular reporting on the environmental performance of the Development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; (vi) a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (vii) a summary of the current stage and progress of the Development; (viii) contact details to enquire about the Development or to make a complaint; (ix) a complaints register, updated monthly; (x) the Compliance Report of the Development; (xi) audit reports prepared as part of any Independent Audit of the Development and the Applicant's response to the recommendations in any audit report; (xii) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary.	<ul style="list-style-type: none"> Development website: https://luddenhamrecycling.com.au Interview with Coombes Property Group (Coombes PG) & Texco Construction (Texco), 09/07/2025 	C	<p>Documentation within the Development Website meets the requirements of the Condition with the exception of (a) (ix).</p> <p>• IA1 – OFI02 Condition C20 (a) (ix) requires that a complaints register, updated monthly, be made publicly available on the development website. A review of the Development website indicated that complaints have been reported to end May 2025, rather than end June 2025 which should be the case given the date of the audit (9 July 2025). Coombes PG should update complaints reporting on the Development website to end of June 2025 and ensure complaints information are revised, or the complaints register uploaded monthly once complaints are received.</p>



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APPENDIX B – AGREEMENT OF INDEPENDENT AUDITORS



NSW Planning ref: SSD-10446-PA-15

Pascal Bobblier
General Manager Development
The Trustee for Coombes Family Trust No. 13
Level 5, 2 Grosvenor Street
Bondi Junction NSW 2022

06/05/2025

Sent via the Major Projects Portal only

Attention: Elena Ivanova

Subject: Luddenham Resource Recovery Facility - Appointment of Experts

Dear Mr Bobblier

I refer to your request for the Planning Secretary's endorsement of suitably qualified, experienced, and independent persons to conduct Independent Audits of the Luddenham Resource Recovery Facility, submitted as required by Schedule 2, Condition C17(b) of SSD-10446 as modified (consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 7 April 2025.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

Pursuant to Schedule 2, Condition C17(b) of the consent, as nominee of the Planning Secretary, I endorse the following independent audit team from Healthy Buildings International Pty Ltd:

- Rui Henriques as lead auditor, and
- Swathi Gowda as alternate lead auditor.

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements (2020)*. Failure to meet these requirements will require revision and resubmission.

- The above audit team is approved for the duration of construction and the initial operational audit of the development. However, NSW Planning reserves the right to request an alternate auditor or audit team at any time.
- Any change to auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.
- The audit period is the day after the last site inspection date of the previous audit, to the final site inspection date of the current audit.

I note that the auditor certification for Swathi expired on 21 April 2025. Please ensure that current certificates are attached for both auditors in the final audit report.

Please ensure that the approved auditors have capacity to complete the audit on time.

Should you wish to discuss the matter further, please contact Dan Couriel, Senior Compliance Officer at compliance@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "S Condon".

Samuel Condon

A/Team Leader Compliance - Metro

As nominee of the Planning Secretary



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APPENDIX C – AUDIT PLAN AND ATTENDANCE RECORDS



Audit Plan

Audit Site/Project: Luddenham Resource Recovery Facility <u>Application Number:</u> SSD-10446 <u>Proponent:</u> The Trustee for Coombes Family Trust No.13 (Coombes Property Group) <u>Approval Authority:</u> Minister for Planning		Contractors: Texco Construction
This Audit Plan provides an outline of the proposed 1st Independent Environmental Audit (IA1) for the IA Program.		
Auditee Representative/s and Contact Details (Texco): Tom McCreanor Texco Construction Senior Project Manager tmccreanor@texco.net.au – Stakeholder and Community Peter Free Texco Construction Site Manager pfree@texco.net.au – Environmental Management Vinesh Rao Texco Construction Senior Contract Administrator vrao@texco.net.au – Environmental Compliance		Audit Identification: IEA1_ SSD10446_Independent Audit 9_ July 2025 Audit Dates and Indicative Program: <ul style="list-style-type: none"> 9 July 2025 (Wednesday) Indicative Audit Program - Refer Appendix A
Auditee Representative/s and Contact Details (TfNSW): Elena Ivanova Environmental & Planning Manager I 0415 556 620 elena@coombesgroup.com.au		
PROPOSED AUDIT SCHEDULE		
SITE INSPECTION AND AUDIT – 9 July 2025		
Time	Audit Attendees	Scope
Opening Meeting 9:00am – 9:15am	All	NA
Site Inspection 9:15am – 10.30pm <u>Meeting Place:</u> Site Office, 275 Adams Road, Luddenham NSW 2745	TfNSW Texco including relevant Site Supervisor(s) for Site Inspection Areas	Stage 2 Main Works / Texco <ul style="list-style-type: none"> Works at the time of the audit (TBC)
<u>Desktop Audit:</u> 10:30pm–5:00pm (TBC pending duration of Site Inspection) Lunchbreak: Approximately 12.30pm – 1.00pm Interviews / Verification of evidence Site Office, 275 Adams Road, Luddenham NSW 2745	TfNSW Texco (relevant personnel TBC further in Opening Meeting and during the audit – such as Community Stakeholder and Engagement, Traffic, Design)	<ul style="list-style-type: none"> Consultation Scope (DPHI/EPA) Part A (Administrative Conditions) Part B (Specific Environmental Conditions) Part C (Environmental Management, Reporting and Auditing) An assessment of incidents, non-compliances and complaints that occurred or were made during the audit period

Audit Team:

- **Lead Auditor:** Rui Henriques (Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C-486435)
- **Alternate Lead Auditor:** Swathi Gowda (Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C-442234)

Audit Objective:

This Independent Audit has been prepared to satisfy **Condition C17** of the State Significant Development (SSD) 10446 planning approval and aims to meet the minimum requirements of the Independent Audit Post Approval Requirements (IAPARs).

Audit Reference Documents:

- *Independent Audit Post Approval Requirements (DPIE, 2020)*
- *ISO 14001: 2015 Environmental Management Systems*
- *AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems*
- Evidence submitted for review during the audit

Audit Period: The temporal period covered by the audit is from the date of the date of Commencement of Construction (1 May 2025), to the date of the site inspection (9 July 2025) of this Independent Audit of Luddenham Resource Recovery Facility.

Audit Scope:

The audit is scheduled to commence with a site inspection on 9 May 2025 and pertains to post-approval requirements and compliance during Construction of the following stages:

- Luddenham Resource Recovery Facility (LRRF) Construction (commencement of construction 1 May 2025)

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 10446 Schedule 2, Parts A, B, C, Appendix 2 and Appendix 3 in particular those conditions and requirements which are applicable to LRRF Construction works;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
- feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

During the consultation period, the Department provided the following verbal feedback in relation to the audit scope:

- Telephone conversation of 12 June 2025 with Mr Dan Couriel – The Department has no additions to the audit scope outlined in the Auditor's letter dated 23/5/25 consulting with the Department.

Evaluation of compliance will be carried out in accordance with Sec 3.7 of the IAPARs and documented in an Audit Table, which will include the conditions of SSD 10446. The compliance status of each compliance requirement in the Audit Table will be determined using the relevant descriptors in Sec 3.8, Table 2 of the IAPARs. As part of the Audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the Project

The Audit Table maybe updated to incorporate Project-specific requirements where necessary.

Documentation and Records:

The following list provides a high level indication of documentation and records that may be requested for review prior to and during the audit:

- Consistency Assessments
- Construction Monitoring Reports
- Construction Environmental Management Plan and associated sub-plans
- Relevant supporting correspondence from the Department, other agencies and stakeholders
- Erosion and Sediment Control Plans
- Out of Hours Works Applications and Permits
- Specialist Reports including (but not limited to):
 - Soil and Groundwater technical reports, including waste classification reports
 - Heritage clearance reports, Statements of Heritage Impact
 - Noise and Vibration Assessments, and monitoring data
 - Water quality assessments, and monitoring data
 - Ecological / Flora and Fauna / Tree Protection (Arborist) Reports.
- Any other applicable approvals, permits or project-specific environmental requirements
- Evidence of submission of documents and records to agencies and the ER
- ER Inspection Reports and Quarterly Reports
- Complaints Registers and complaint response records
- Incident and Non-Compliance Reports, evidence of action close-out.

Applicable Site Safety Rules:

To be advised by the Auditees

PPE Requirements:

To be advised by the Auditees

Any Special Conditions or Requirements: To be advised by the Auditees

Prepared By:

Rui Henriques
Lead Auditor
Healthy Buildings International Pty Ltd
25 June 2025



Appendix A –Independent Audit Indicative Audit Program

Independent Audit – Task/Details	Proposed Dates
STAKEHOLDER CONSULTATION	
DPHI scope consultation commenced	23/05/2025
DPHI scope consultation received	6/06/2025
Other stakeholder (NSW EPA, NSC) scope consultation - commenced on receipt of DPHI scope consultation	10/06/2025
Other stakeholder consultation period finishes	24/06/2025
Interview with ER (including scope consultation)	by 26/06/2025
AUDIT PLANNING/PRELIMINARY DOCUMENT REVIEW (AVAILABLE INFORMATION)	
Pre audit planning	30/05/2025 to 8/07/2025
SITE VISIT/INTERVIEWS	
Opening Meeting, Site Inspection, Site Interviews and Verification of evidence	9/07/2025
POST VISIT VERIFICATION	
Follow up period for verification of evidence (desktop) - It is the responsibility of the auditee representatives to provide all information within timeframes requested by the Lead Auditor / Alternate Lead Auditor	10/07/2025 to 23/07/2025
Closing Meeting - Final (TBC)	23/07/2025
DRAFT REPORTING	
Draft Consolidated Audit Report including Audit Table - WFU	23/07/2025
REVIEW PERIOD	
Auditee Review Period (Coombes/Contractor): - Comments back within one week (One set of consolidated comments is requested from review of Draft Audit Report). - The Draft Audit Report may only be revised in instances where Auditors are satisfied that the additional information or evidence provided is sufficient to determine that an error of fact or misunderstanding has taken place.	30/07/2025
FINAL REPORTING	
Final Consolidated Audit Report - LRRF issued to Coombes Property Group	6/08/2025



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APPENDIX D – CONSULTATION RECORDS



23 May 2025

Dan Couriel
Senior Compliance Officer
Department of Planning Housing and Infrastructure
compliance@planning.nsw.gov.au

Ref: 250410 LRRF IA1

Dear Dan

RE: First Independent Audit - SSD 10446 – Luddenham Resource Recovery Facility

As the independent auditor engaged by Coombes Property Group for the Luddenham Resource Recovery Facility project (SSD 10446; the Consent), I am consulting with DPHI on the scope of the **first** Independent Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The Consent is available at the following link:

[Luddenham Resource Recovery Facility | Planning Portal - Department of Planning, Housing and Infrastructure \(nsw.gov.au\)](#)

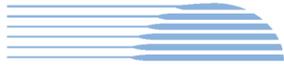
The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection on **9 July 2025** and pertains to post-approval requirements and compliance during Construction, which commenced on 1 May 2025.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSD 10446 Schedule 2, Parts A, B, C, and Appendices 1,2 and 3;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;



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- feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that DPHI confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We look forward to hearing from you before **11 April 2025** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please contact Rui Henriques (Independent Lead Environmental Auditor, HBI) on rui.henriques@hbi.com.au

Yours sincerely

Rui Henriques
Lead Auditor

cc. Elena Ivanova (elena@coombesgroup.com.au)



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APPENDIX E –AUDITOR DECLARATIONS



Attachment E: Independent Audit Report Declaration Form

Independent Audit Report Declaration Form

Project Name	Luddenham Resource Recovery Facility
Consent Number	SSD-10446
Description of Project	The construction and operation of a resource recovery facility (RRF) to receive and process up to 600,000 tonnes per annum (tpa) of general solid waste (non-putrescible), comprised of construction and demolition waste and commercial and industrial waste, for recycling, in the Liverpool local government area (LGA).
Project Address	275 Adams Road, Luddenham, Lot 3 DP 623799
Proponent	The Trustee for Coombes Family Trust No.13 (Coombes Property Group)
Title of Audit	Independent Audit No. 1 Luddenham Resource Recovery Facility (LRRF)
Date	5 August 2025

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019)
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of Auditor Rui Henriques

Signature



Qualification Exemplar Global Certification, Lead Auditor, Environmental Management
Systems Auditor, Certificate No. C-486435

Company Healthy Buildings International Pty Ltd.

Company Address Unit 2.06, 29-31 Solent Circuit, Norwest NSW 2153

Coombes Property Group's response to the first audit findings

Condition of Consent (ID)	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Proposed Action/Action taken/Response (as applicable)	Proposed Action Due Date
C20 (a) (ix)	<p><i>At least 48 hours before the commencement of construction of the Development and for the life of the Development (or such other time as agreed by the Planning Secretary), the Applicant must:</i></p> <p><i>(a) make the following information and documents (as they are obtained or approved) publicly available on its website:</i></p> <p>...</p> <p><i>(ix) a complaints register, updated monthly;...</i></p>	<p>IA1 - Audit Finding</p> <p>The condition requires that a complaints register, updated monthly, be made publicly available on the development website.</p> <p>A review of the Development website indicated that complaints have been reported to end May 2025, rather than end June 2025 which should be the case given the date of the audit (9 July 2025).</p>	<p>It is recommended that Coombes update complaints reporting on the Development website to end of June 2025 and ensure complaints information is revised, or the complaints register uploaded monthly once/if complaints are received.</p>	<p>The project webpage has been updated and will continue to be maintained to ensure compliance with C20(a)(ix). Compliance with this condition will be formally verified during the next scheduled audit in December 2025.</p>	NIL