

The Planning Secretary  
The Department of Planning, Housing and Infrastructure  
4 Parramatta Square, 12 Darcy Street  
PARAMATTA, NSW, 2140

6 November 2025

Dear Planning Secretary,

**Moorebank Avenue Realignment Works - SSI 10053**  
**Response to Independent Environmental Audit #3**

The purpose of this correspondence is to provide response to the Independent Environmental Audit Report #3 (Audit Report) (prepared by Trigalana – dated 3 November 2025), as required by condition of approval (CoA) A37(b) of the Moorebank Avenue Realignment Works (MARW) Instrument of Approval (approval) (SSI -10053).

This response has been prepared in conjunction with the BMD Constructions Pty Limited, the construction contractor appointed by National Intermodal for the construction of the MARW.

Further, the Audit Report (enclosed) and this response addresses the following CoA of SSI-10053:

- CoA A34 - the independent environmental auditor, Richard Peterson (Trigalana), has been approved by the Secretary (correspondence dated 7 December 2024)
- CoA A35 - the Audit Report, has been prepared in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020), in particular:
  - audit report submitted to DPHI within 2 months from the site audit inspection (11 September 2025 inspection / deadline for submission 11 November 2025).

The Audit Report concludes that the works undertaken to date for the project (with the exception of one non-compliance) are compliant with the approval. National Intermodal supports the findings of the Audit Report. For completeness a response to the findings of the Audit Report is provided within Table 1.

Table 1 National Intermodal response to Audit Report findings

Audit Report	National Intermodal /BMD Response	Action Required
<b>Findings</b>		
Construction activities have progressed since the previous Audit with mainline clearing substantially complete and earthworks underway.	Agree.	N/A
Experienced environmental professionals and specialists have been appointed to oversee	Agree.	N/A

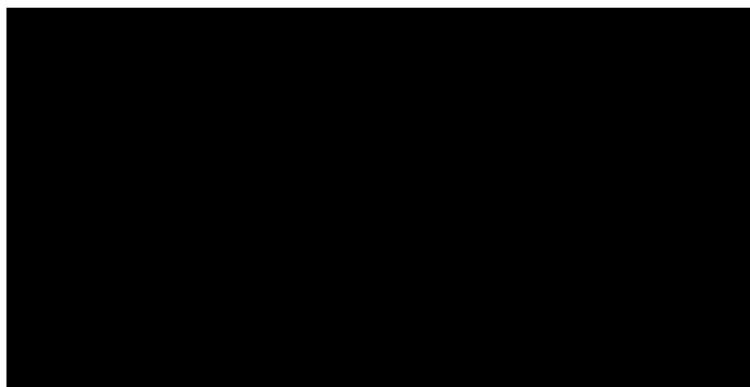
Audit Report	National Intermodal /BMD Response	Action Required
the implementation of the CEMP and subplans.		
<p>Key environmental issues are being managed effectively on site as summarised:</p> <ul style="list-style-type: none"> <li>Erosion and sediment controls including sediment basins, clean water diversions, geofabric lined drains, stabilised site access and sediment fences have been installed</li> <li>Asbestos contaminated material has been segregated and stockpiled with signage and geofabric covers to prevent offsite migration of contaminated material</li> <li>Regular inspections undertaken by the Independent Environmental Representative and an experienced Certified Professional in Erosion and Sediment Control (CPESC).</li> </ul>	Agree.	N/A
No construction related complaints have been received during the Audit period or reportable environmental incidents.	Agree.	N/A
One non-compliance has been recorded by the Audit. The non-compliance related to a boundary exceedance that was self-reported to DPHI. DPHI subsequently issued a written warning to BMD noting the non-compliance resulted in breaches of Conditions A1 and E3.	Agree.	N/A
<b>Recommendations for improvement</b>		
Continual monitoring, review and improvement of clearing processes and activities, to ensure there are no further over clearing incidents or other activities that exceed the project boundary.	<p>Noted. BMD undertook several corrective measures to ensure there was no further clearing outside the project boundary.</p> <p>Clearing is now completed and is below the overall clearing limits under the MARW Approval.</p>	No further action.
Installation of advisory signage for sediment basins to minimise the risk of uncontrolled discharge of untreated water.	BMD has recently installed advisory signage at all basins, which will be maintained throughout construction (refer to <b>Attachment A</b> ).	No further action.
Consultation with Wattle Grove Public School when planning for noisy works where there is a potential exceedance of noise criteria.	Noted. This requirement is also evident within the Construction Noise Vibration Management Plan	To be implemented in accordance with the CNVMP.

Audit Report	National Intermodal /BMD Response	Action Required
	(CNVMP) for the Project.	
<b>Strengths</b>		
One key strength has been identified by the Audit relating to a high standard of soil and water management with oversight provided by an experienced CPESC and dedicated labour resources to implement and maintain controls.	Noted and agree.	N/A

A copy of the Audit Report and this letter of response will be uploaded to the project website within 60 days (of the date of this letter, i.e. submission to DPHI) in accordance with CoA B13 (SSI-10053).

Please do not hesitate to contact the undersigned with any further questions.

Yours sincerely,





## Attachment A – Basin advisory signage photos





