

25 June 2025

Heidi Watters

Team Leader - Compliance

Department of Planning, Housing and Infrastructure

Locked Bag 5022

Parramatta NSW 2124

Re: Gosford Alive, 136-146 and 148 Donnison Street, Gosford - SSD-9813

Independent Environmental Audit – Request for Endorsement of Audit Team

In accordance with requirements of the Independent Audit Post Approval Requirements (IAPAR) (Department, 2020), The Bathla Group (Bathla) requests the Secretary's endorsement of the proposed Audit Team as suitably qualified persons to prepare the Independent Environmental Audit (IEA) and report for the Gosford Alive Project site, 136-146 and 148 Donnison Street, Gosford (the Project), SSD-9813. The proposed audit team includes:

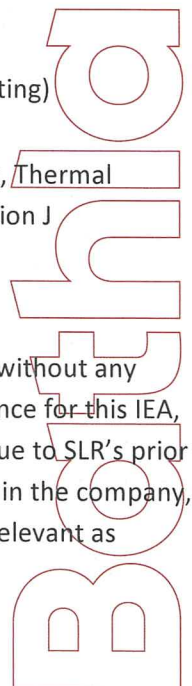
- Lead Auditor: Stephen Shoesmith (Exemplar Global Certified Lead Auditor: ISO 14001:2015 Environment; Certificate No. C-478261, 23 July 2025).
- Assistant Auditor and QA/QC: Anna Cochrane (Exemplar Global Certified Lead Auditor: ISO 14001:2015 Environment; Certificate No. C-427136, expires 17 Mar 2026).

CVs and Declaration of Independence Forms for the nominated Audit Team are attached, demonstrating their qualification, experience and independence to achieve the IEA's objectives in alignment with requirements set out in Section 3.1 of the IAPAR.

The Audit Team notes for the Secretary's information that in 2024 SLR provided specialist engineering and sustainability studies for Stage 2 works of the Project, including:

- Wind Engineering (qualitative Wind Impact Assessment and Environmental Wind Tunnel Testing)
- ADG Cross Ventilation Study.
- Sustainability Services (ESD and Sustainability Strategy Report , Net Zero Emission Statement, Thermal Comfort Modelling and NatHERS Certification, BASIX - Energy and Water Efficiency, BCA Section J Compliance Report Deemed to Satisfy Method).
- NABERS Modelling - Commercial Component (Energy & Water Rating).

These studies were undertaken independently by SLR engineering and sustainability specialists, and without any involvement from SLR's proposed Audit Team for the IEA. In making their Declarations of Independence for this IEA, the Audit Team confirm that they have no actual or potential conflicts of interest or independence due to SLR's prior engagement these assessments, given they are employed within a different Technical Discipline within the company, were not involved with any of these works, and that the outcomes from these assessments are not relevant as evidence for this upcoming IEA.



The nominated Audit Team will include their Declaration of Independence alongside their Independent Audit Report Declarations as per Appendix A and Appendix E of the IAPAR.

We look forward to the Department's approval of our nominated audit team as above.

Should you have any questions or wish to discuss the nominated Audit Team, please contact me as below.

Yours sincerely,



Name: Darren Beasley

Position: Development Director

Declaration of Independence Form	
Project Name	Gosford Alive, 136-146 and 148 Donnison St, Gosford NSW Lot 6 DP598833 and Lot 1 DP540292
Consent No.	SSD-9813
Description of Project	Concept Proposal and Stage 1 Works
Project Address	136-146 and 148 Donnison St, Gosford NSW
Proponent	Bathla Group Pty Ltd (formally known as Universal Property)
Date	25 June 2025
<i>I declare that:</i> <i>i) I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;</i> <i>ii) I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;</i> <i>iii) I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;</i> <i>iv) I am not an Environmental Representative for the project; and</i> <i>v) I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so.</i> 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) 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 Proposed Auditor	Stephen Shoesmith
Signature	
Qualifications	Master of Integrated Environmental Management, University of Bath (2016). Bachelor of Environmental Science University of Newcastle (2007). Certified Exemplar Global Lead Auditor (Certificate No. C-478261, expires 23 July 2025)*Currently being renewed
Company	SLR Consulting Australia Pty Ltd



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Name of Proposed Auditor	Anna Cochrane
Signature	
Qualifications	G.Dip (Soil Science) B.Sc (Geology) Certified Exemplar Global Lead Auditor (Certificate No. C-427136, expires 17 Mar 2026)
Company	SLR Consulting Australia Pty Ltd





Stephen has a passion and proven history in balancing the interactions between development, the environment and stakeholders to deliver sustainable outcomes. With over 17 years' experience in environmental management, permitting and compliance within consulting, industry and government, Stephen employs proactive, pragmatic and systematic approaches to deliver results.

Stephen is a dedicated team player with a collaborative leadership style. He applies an intrapreneurial mindset to identify and implement business improvement opportunities and has an absolute commitment to workplace health and safety. Stephen is accomplished in delivering outcomes in government, industry and as part of the Environmental Management, Permitting and Compliance team within SLR.

Stephen has built a multi-faceted career focussed on post approvals and compliance and has introduced systems and strategic frameworks to deliver sustained outcomes.

Education

- Master of Integrated Environmental Management, University of Bath (2016).
- Bachelor of Environmental Science (Management), University of Newcastle (2007).

Project / Work Experience

Consulting

Team Lead, South East Australia and Principal Consultant (2022 to Current)

Senior role within the SLR Consulting, APAC to manage key client relationships, coaching, guiding and motivating the team; and ensuring outstanding technical quality of deliverables.

- Conducted compliance audits and inspections for **mines, breweries, poultry farms and waste facilities**.
- Revised Mining Operations Plans and Rehabilitation Management Plans for **mining clients**.
- Provided strategic and practical insights into the completion of Rehabilitation Management Plans (**Various Clients**).
- Drafted numerous Construction Environmental Management Plans (CEMP) and Operational Environmental Management Plans (OEMP).
- Drafted and Project Directed numerous Pollution Incident Response Management Plans (PIRMPs).
- Developed a Master Plan version of a CEMP.
- Migration of Rehabilitation Cost Estimates for **mining clients** into the update Resources Regulator tool.
- Management of Mine Closure Planning for **mining clients**.
- Various Annual Reviews (Mining and Poultry).
- Led several Internal Compliance Audits for various mines.
- Oversight of compliance advice on incident reporting and compliance management for mining clients.



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- Management of Annual Rehabilitation Plans and Forward Programs for **mining clients**.
 - Project Directed and provided practical insights for Rehabilitation Strategies for various mines and quarries.
 - Project Managed **a greenfield mine** Environmental Impact Statement and associated tasks.
 - Co-ordinated due diligence assessments to support and investment rounds.
 - Co-ordinated the development of revised completion criteria in response to agency feedback for mining clients.
 - Chairperson for the Mamre Road Precinct Working Group.

Industry

Group Environment Manager (2021 to 2022)*

Leadership role empowering a team to manage environmental management and compliance requirements for 15 regionally diverse mining operations and sites in NSW.

- Provided strategic and risk evaluation advice on operational compliance matters.
- Co-ordinated annual business and budget planning.
- Introduced Horizon Planning to improve efficiencies in workload delivery.
- Co-ordinated site risk assessment and due diligence programs.
- Led the Group Independent Environmental Audit Program.
- Introduced systems and process to enhance the quality of reporting requirements.
- Managed environmental and incident reporting requirements including Annual Reviews, Annual Returns and Incidents.

Environmental Officer / Co-ordinator (NSW Coal)*

Managed compliance requirements across a range of environmental aspects, including management plans and procedures, land rehabilitation, community and stakeholder engagement, erosion and sediment control, water management, noise management, air quality management, hydrocarbon management, land management, aboriginal heritage, monitoring and regulatory reporting specifically:

- Co-ordinated the Annual Rehabilitation, Land Management and Biodiversity Programs.
- Project managed several construction projects.
- Co-ordination of community engagement and complaint response.
- Co-ordinated the development of site compliance management systems.
- Co-ordination and management of contractors and consultants.
- Led environmental due diligence audits and inspection programs.
- Reviewed environmental monitoring data and analysed results against trigger action response plans.
- Developed, maintained and improved site environmental management systems.



Government

Principal Policy Officer – Department of Planning and Environment (2019-2021)*

Identified leading practice solutions, translated theory and research into practical applications and engaged with stakeholders to produce enhanced outcomes for Energy, Resources and COVID19 Response policies. Specifically:

- Contributed to various policy projects and successful reforms, including social impact assessment, Statement Environmental Planning Policy amendments, mine rehabilitation policy updates and the COVID planning reforms.
- Supported the Secretariat function for the Independent Advisory Panel for Underground Mining.
- Provided specialist advice into the development of post approval guidelines.
- Contributed to the development of the residual risk framework (Closure) in Queensland.

Senior / Specialist Planner – Department of Planning and Environment (2016-2018)*

Completed the government's environmental assessment of state significant development projects and post approval submissions for coal mining, mineral mining, wind and solar projects.

Memberships and Associations

- Property Council: 2023 to 2024 NSW Futures Committee Member.

Conference Presentations

- MEET Conference, Post Approvals and Management Plan Submissions (August 2018).
- Mine Rehabilitation Conference for the IECA, Bulga Coal Complex Mine Closure Planning Improvement Project – Beginning with the End in Mind (May 2011).

Professional Development

- Exemplar Global Lead Audit: Environmental Management Systems C-478261 (2024).
- Incident Cause Analysis Method (ICAM), October 2015.
- Forsythes Training: Apply risk management processes – GRN1 (RIIRIS301D), August 2015.
- Glencore: Investigation Training (Root Cause Analysis), August 2014.
- Kepner Tragoe: Project Management, Sydney, April, 2009.
- Jim Knowles Group: Carry out the Risk Management Process, GRN2 (RIIS402D), June 2008.

Anna is an environmental, safety and systems compliance specialist and manager with almost 30 years' experience across a wide range of contaminated sites, industrial facilities, water treatment (desalination), infrastructure and waste management matters for major project, operational and green/brownfield facilities. Anna's experience includes fulfilling senior environmental manager / specialist roles within state and federal government, commercial, industrial, and consulting organisations.

Anna has particular interest in supporting operational HSEQ compliance and performance within complex regulatory, contractual and asset management frameworks. Anna has developed, implemented, and managed Integrated Management Systems (IMS) suitable for contractual compliance and certification against multiple ISO management system standards, including AS/NZS ISO 9001 (Quality), AS/NZS ISO 14001 (Environmental), AS/NZS ISO 45001 (OHS) & AS/NZS 55001 (Asset) Management Systems standards and alignment with ISO 22000 Food Safety and ISO 31000 Risk Management Standards. Managing the IMS for the Victorian Desalination Project (VDP) in Wonthaggi highlights Anna's skills in this regard, including facilitating the certification of the VDP's IMS against ISO 55001 Asset Management Systems, at the time only the second Australian facility to achieve this certification.

Anna is an Exemplar Global Certified Lead Auditor and has been accepted by NSW DPHI (formerly DPE) as Environmental Auditor for conduct of Independent Environmental Audits of major project approvals in NSW. Anna was awarded runner-up in Suez Australia 2021 Innovation Awards, for development and implementation of innovative waste reduction and recycling initiatives. Anna received an SLR Australia Pacific peer nominated Make a Difference Award in 2022 for contributions to her project teams.

Education & Training

- Master of Occupational Health Safety and Environmental Management (50%, Current)
- Graduate Diploma in Soil Science (1997)
- Bachelor of Science - Geology Double Major (1995)
- Certificate IV (Workplace Assessment and Training) (2001)
- Exemplar Global Lead Auditor – Environmental (C-427136, expires 17 March 2026)
- Internal Auditor:
 - Quality Management Systems (ISO 9001:2015)
 - OH&S Management Systems (ISO 45001:2018)
 - Environmental Management Systems (ISO 14001)
 - Asset Management Systems (ISO 55001)
 - Food Safety Management Systems (HACCP / ISO 22001)
 - Certified Environmental Auditor (Victorian Desalination Project)
- Australian Inter-Service Incident Management System – Level 1 Incident Controller (2019)
- Lead Incident Investigator (ICAM – Incident Cause Analysis Method Methodology) (2009)
- Standard Mental Health First Aider (2018, 2021)



Awards

- Suez Australia Innovation Awards, runner up (2021)
- SLR Australia Pacific Make a Difference Award (2022)

SLR Project Experience

NSW Department of Planning, Housing & Infrastructure (DPHI) Independent Environmental Audits:

- Oakburn Integrated Poultry Processing Facility, Baiada Pty Ltd (2024); Construction and operations phases; Lead Auditor approved by NSW DPHI.
- Hanwood Integrated Poultry Processing Facility, Baiada Pty Ltd (2024); Construction and operations phases; Lead Auditor approved by NSW DPHI.
- Rouse Hill Anglican College Redevelopment, Phase 3: Senior School (CC3 – Senior School Redevelopment) (2023-2025); 3 x construction phase audits; Lead Auditor approved by NSW DPHI.
- Invincible Coal Mine, Castlereagh Coal, Lithgow NSW (2024); Operations and rehabilitation activities; Lead Auditor approved by NSW DPHI.
- Richmond Vale Ammonium Nitrate Emulsion Plant, Orica Australia Pty Ltd (2022); Operations phase; Lead Auditor approved by NSW DPHI.
- Aurizon Hexham Train Servicing Facility, Aurizon Operations Ltd (2022); Construction phase; QA/QC / Technical Reviewer.

QLD Department of Environment, Tourism, Science & Innovation (DETSI) Third-Party Environmental Compliance Audits:

- Mount Carlton Operations, Navarre Minerals Queensland Pty Ltd (2023-2024); Operations and caretaker mode; Lead Auditor.
- New Acland Coal Mine, New Hope Group Ltd (2023); Construction and operations activities; Lead Auditor.

Coordinator General's Report Environmental Compliance Audits:

- New Acland Coal Mine, New Hope Group Ltd (2025); Construction and operations activities; Lead Auditor.
- New Acland Coal Mine, New Hope Group Ltd (2023); Construction and operations activities; Lead Auditor.

NSW Department of Planning, Housing & Infrastructure (DPHI) Compliance Reports:

- Elevation at Greystanes Development, ISPT Pty Ltd (2025); Lead Reviewer.
- Black Hill Liquid Waste Facility, Enviroking Pty Ltd (2025); QA/QC & Assistant Reviewer.
- The Yards Development, Frasers Industrial Property Group (2025); QA/QC & Assistant Reviewer.
- Yiribana Logistics Estate, GPT Pty Ltd (2025); QA/QC & Assistant Reviewer.
- Rushes Creek Poultry Production Unit (PPU), ProTen Pty Ltd (2025); Lead Reviewer.
- Elevation at Greystanes Development, Aliro Pty Ltd, NSW (2024); Lead Reviewer.
- Black Hill Liquid Waste Facility, Enviroking Pty Ltd (2024); Lead Reviewer.
- Rushes Creek Poultry Production Unit (PPU), ProTen Pty Ltd (2024); Lead Reviewer.

Occupational Work, Health and Safety Compliance Audits and Technical Support:

- EHS Compliance & Machinery Guarding Assessment; Precision Parts manufacturing facility, Wagga Wagga NSW for Dayco Products Global EHS Review Program, Michigan, United States (2024); Lead Auditor.
- WHS Compliance Audits of demolition, waste management & recovery facilities, Project Robin Sites (RCG Cardiff & Kurri Kurri & Drumderg Services), NSW for Igneo Infrastructure Partners (2024); Lead Auditor.

- Environmental and Social Management System (ESMS) & Health and Safety Management Plan (HSMP) - Project Genesis, Far North Solar Farm & Aquila Group, New Zealand (2023); Prepared HSMP and assisted preparation of an overarching ESMS for development of a renewable energy project Portfolio comprising four solar farms located in New Zealand.
- Work, Health and Safety (WHS) Audit, Royalla Solar Farm, ACT for RES Ltd, (2023); Lead Auditor.
- EHS Compliance Assessment of Precision Parts manufacturing facility, Wagga Wagga NSW for Dayco Products Global EHS Review Program, Michigan, United States (2022); Lead Auditor.
- EHS Compliance Assessment of warehousing and logistics facility, Hallam, Vic for Dayco Products Global EHS Review Program, Michigan, United States (2022); Lead Auditor.
- Work, Health and Safety Self Insurance Audit, Inghams Enterprises Pty Ltd (2022); QA/QC & Technical Reviewer.
- Work, Health and Safety Self Insurance Audit, Arnott's Biscuits Limited (2022); QA/QC & Technical Reviewer
- Work, Health and Safety Self Insurance Audit, Townsville City Council (2022); QA/QC & Technical Reviewer.
- HSE Legal Register Validation, Review & HSE Compliance Review – Brisbane Laboratory, for IDEXX Laboratories Inc, Marine, United States (2022).

Global Industry Standard on Tailings Management Conformance Audit

- Dugald River Mine, GSTM Gap Assessment Audit, for Mt Isa Minerals Group, (2025); Environmental & management systems reviewer.

Other Projects:

- Compliance support: Noise Risk Assessment and Management Plan, Alpine MDF, Wangaratta, VIC Australia (2025); Project Manager & Environmental Lead.
- Operational Management Plan Reviews, Black Hill Liquid Waste Facility, NSW for Enviroking Pty Ltd (2024); Review support.
- Operational Management Plan Reviews, Rushes Creek Poultry Production Unit (PPU), NSW, for ProTen Pty Ltd (2023); Review support.
- Wollert Resource Park – Waste to Energy Project Development Licence Application, Vic, for Hanson Australia (2024); Environmental technical advice & project support.
- Risk-Based Clean Up Plan – Wood Fibre Debris, Alpine MDF, Wangaratta, VIC Australia (2023); Project manager and compliance lead including EPA liaison.
- Compliance support: Stage 1 EPA Site Audit Review and Action Plan, Alpine MDF, Wangaratta, VIC Australia (2022 - 2024); Compliance lead including EPA and EPA-Appointed industrial Facilities Auditor liaison.
- Senior Environmental Specialist, Enabling Works Program, North East Link Project – Early Work Package, Melbourne VIC Australia (2022 - 2024); Client-side environmental technical and compliance support (3 days per week).
- Environmental Management System, Perth Airport Limited (2022 – 2023); Development of ISO14001 aligned EMS and guidance documents.
- Rehabilitation Management Plan (RMP), Newstan Colliery Complex NSW, Centennial Fassifern Pty Ltd (2022); Prepared RMP for Newstan Colliery complex, comprising Newstan and Awaba Collieries and Northern Coal Services processing facility.
- ESG Journey – Environmental, Health & Safety Support, ConvaTec Group, Reading United States (2022); Scoping and project support including WHS benchmarking and

WHS Strategy review as part of wider sustainability project for global manufacturer and supplier of medical technologies and devices.

- Rehabilitation Planning, Former Rum Jungle Uranium Mine NT, Australia; Environmental support and advice to inform the rehabilitation design, strategy and approvals.
- Environmental Impact Assessment: Stakeholder Engagement Strategy, Hawson Iron Project Broken Hill, NSW, Australia (2022); Strategy development support.

Employment Experience

- Principal Consultant Environmental Assessment & Management, SLR Consulting Pty Ltd, Townville QLD, Australia (2022 – Current)
- Environmental and Systems Specialist (Environment Manager) / Health Safety, Environmental and Quality Systems Manager, Watersure, Victorian Desalination Project Wonthaggi, VIC Australia (2016 – 2022)
- Occupational Health, Safety and Environmental Specialist Director, Australasian Environmental Services Pty Ltd, Aspendale VIC Australia (2013 – 2016)
- Environmental Specialist, Airservices Australia, Canberra, ACT and Tullamarine VIC Australia (2014 – 2015)
- Principal Environmental Scientist, CDM Smith Pty Ltd Brighton VIC Australia (2014)
- Environmental Co-ordinator – Integrated Management System Development, Aggreko Generator Rentals Pty Ltd Braeside VIC Australia (2013 – 2014)
- Environmental Specialist – Vic, Tas & SA; and Acting Environment and Technical Manager, Victorian Landfills; Transpacific Industries Group Ltd (Cleanaway), Australia (2009-2012)
- Senior Environmental Scientist and Auditor Representative, Chadwick Tonkin and Taylor Pty Ltd, Keysborough VIC & Fremantle WA, Australia (2007 – 2008)
- Senior Environmental Scientist and Auditor Representative, Coffey Geoscience / Coffey Environmental Pty Ltd Hawthorn & Abbotsford, VIC, Australia (2002 – 2007)
- Environment Protection Officer / Authorised Officer, Environment Protection Authority Melbourne & Dandenong, VIC, Australia.
- Environmental Geologist, Site Remediation Services Pty Ltd, Werribee, VIC Australia.
- Field Soil Scientist, Van de Graaff and Associates Pty Ltd, Park Orchards, VIC, Australia.

Memberships and Associations

- Women in Sustainable Energy & Resources (WISER).
- Women on Boards
- Compass Visionary Women's Leadership Program – Dattner Grant Group, Melbourne.