



Integrated  
Management  
System

# Sydney International Speedway SSI 10048 - Sydney Metro response to Independent Audit

iCentral Reference No. SM-21-00377814

Sydney Metro Integrated Management System (IMS)

<b>Applicable to:</b>	Sydney Metro Speedway
<b>Author:</b>	Sydney Metro
<b>System owner:</b>	Sydney Metro
<b>Status:</b>	Final
<b>Version:</b>	1.0
<b>Date of issue:</b>	July 5 <sup>th</sup> 2021
<b>Security classification:</b>	Open Access
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## 5.0 RECOMMENDATIONS

As required by the PAR, Audit Findings and/or Recommendations to identified Non-compliances and Improvement Opportunities (below) must be addressed through a separate Proponent (Sydney Metro) Audit Action Plan tabled with the Planning Secretary.

Implementation of these actions will be verified at the next Independent Environmental Audit.

### 5.1 Non-compliances

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation	Response
NC1	A30	<b>SUBMISSIONS &amp; APPROVALS:</b> Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	<b>Non-compliant:</b> To meet PAR audit frequency requirements, <u>this</u> Independent Audit was obligated to commence whilst Sydney Metro were still awaiting formal Planning Secretary endorsement of the nominated independent auditor.  <i>It should be noted that the Independent Auditor was endorsed by DPIE for the Sydney Metro City &amp; South West SSI project however.</i>	It is recommended that Sydney Metro adopt at least a three-month timeframe for onboarding future Independent Auditors.  To facilitate closure of <u>this</u> Audit Finding it is suggested that Sydney Metro provides the Planning Secretary with an assurance that the SIS learning would be applied to future Sydney Metro projects.	Sydney Metro lodged an application for the IEA on 19/03/2021 and the auditor was approved by DPIE on 09/04/2021. Additional information was required to be provided by the IEA during the approval process which contributed to a delayed approval.  The Post Approval Requirements guideline for independent auditing required that the first audit commence on 7 April 2021 given the start of construction was 13 January 2021 (12 weeks).  A professional services contract was signed on 19 March 2021 with QEM to deliver Independent Environmental Auditing services under SSI 10048.  While Sydney Metro agree that completing the procurement of the IEA earlier than 19 March 2021 would have better enabled compliance with A30, in this instance that was not achievable.

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					It is Sydney Metro's current, and future, objective to have the IEA appointed at the time construction commences.
NC2	A32	<b>SUBMISSIONS &amp; APPROVALS:</b> Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit PAR (2020), unless otherwise agreed by the Planning Secretary.	<b>Non-compliant:</b> This Independent Audit Report was not submitted within the consent condition timeframe, and whilst Sydney Metro notified the Planning Secretary, there was no prior agreement around extended time frame.  <i>The Independent Auditor acknowledges that a Timeline and/or Milestone Plan covering the entire audit process including completion targets for planning, interviews, information provision, evaluation, clarifications, report completion and compilation of an Audit Action Plan might have facilitated the timely completion of the Audit Report and Proponent Action Plan.</i>	It is recommended that Sydney Metro implements and/or facilitates the achievement of an Audit Timeline / Milestone Plan developed by the Independent Auditor.	Sydney Metro agree to facilitate improvements to the independent auditing process as identified by the IEA, and commit to continuing to work collaboratively with the IEA on improving the efficiency of the auditing process defined by the Independent Audit Post Approval Requirements (PAR).
NC3	A35	<b>NON-COMPLIANCE NOTIFICATION:</b> The Planning Secretary must be notified in writing via the Major Projects Website within seven days after the Proponent becomes aware of any non-compliance.	<b>Non-compliant:</b> Non-compliances identified during the Independent Audit Process were not communicated to the Planning Secretary in a timely manner.	Ensure that project stakeholders are aware of non-compliance notification obligations (as is the case for incidents).	The IEA provided the first draft of the report to Sydney Metro on 31 May 2021. Section 4.3.1 of the Independent Auditing Post Approval Requirements allows the proponent an opportunity to review and provide additional information before finalising the report. In collaboration with the IEA the proponent established that factual errors and misunderstandings had taken place over a series of subsequent engagements with the IEA.  Sydney Metro concluded this engagement with the IEA on their audit report on 21 June 2021.

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					<p>A final table of Non-compliances was provided to Sydney Metro on 28 June 2021.</p> <p>Sydney Metro has taken a position that the notification period is triggered upon receipt of the final audit report which occurred on 28 June 2021.</p>
NC4.	B6 (e)	<p><b>INFORMATION:</b> A current copy of each document required under the terms of this approval to be published on the SSI project website within one week of its approval, or before commencement of any work to which they relate or before their implementation.</p>	<p><b>Non-compliant:</b> The Condition E27-required Construction Noise &amp; Vibration Impact Statement dated December 2020 had not been published on the Sydney International Speedway project website before commencement of work. <i>Whilst a single omission, this was undetected and non-compliant for some months, noting also that there were other Planning Approval required Compliance Reports and the Air Quality Monitoring Report requiring imminent publishing post-audit.</i></p>	<p><i>The Construction Contractor uploaded the CNVIS document prior to completion of <u>this</u> audit report, nonetheless it is recommended that:</i></p> <p>Sydney Metro and the Construction Contractor implement a practical and visible process to:</p> <ul style="list-style-type: none"> <li>• Trigger the need for document updates, and</li> <li>• Report on upload dates and compliance with B6 in its entirety.</li> </ul>	<p>Abergeldie have committed to sending confirmation to the ER of upload of approved documents onto the website, prior to the start of works to which the update applies.</p> <p>This has already occurred and will continue to.</p>
NC5.	C7	<p><b>FAUNA &amp; FLORA:</b> CEMP and CEMP Sub-plans, as approved by the ER, including any amendments approved by the ER must be implemented for the duration of construction.</p>	<p><b>Non-compliant:</b> Construction Flora &amp; Fauna Management Plan s7.1.3 requirements for development of a nest box strategy and/or provide durable nest boxes (or artificial hollows) one month prior to native vegetation clearing had not been implemented.</p>	<p>The Construction Contractor to arrange for provision of either durable nest boxes or artificial hollows in accordance with Blacktown City Council requirements for a replacement ratio of 3:1 for all hollows removed.</p>	<p>Abergeldie agree to the auditors recommendation of installation of nest boxes by end August 2021.</p> <p>The target timeframe suggested is likely to be difficult at this stage as lead time for delivery for nest boxes is experiencing a delay due to Covid shutdown.</p>

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			<p><i>Whilst pre-clearance surveys by an Ecologist had been conducted as required, the contractor intimated that no nesting replacement strategies had been recommended, despite several hollow bearing habitat trees needing removal. It should be noted that both Blacktown City Council and the Environment, Energy &amp; Science Group Agency had made related submissions and recommendations, these reflected in the above-mentioned Management Plan.</i></p>	<p><b>Target timeframe:</b> July 2021</p> <p>(Given habitat tree removal some months prior without any action).</p>	
NC6.	E15.	<p><b>FLOODING ISSUE:</b> Detailed design of the SSI to maintain or improve flood characteristics i.e.</p> <ul style="list-style-type: none"> <li>(a) maximum increase in inundation levels upstream of the SSI of 50 mm in a 1% AEP rainfall event;</li> <li>b) no increase in flood inundation levels in the Warragamba Pipelines corridor;</li> <li>c) a maximum increase in inundation time of one hour in a 1% AEP rainfall event.</li> </ul>	<p><b>Non-compliant:</b> No <b>detailed project design</b> could be provided to evidence relevant flood mitigation measures and confirm that required <b>flooding</b> performance objectives and outcomes during the operation of the Speedway would be achieved.</p> <p><i>It was noted that "Accepted" for Construction general arrangement drawings did not specify culvert details, requiring the contractor to size on-site detention basins, and was predominantly SIS precinct focused. No TUFLOW or equivalent flood modelling had been conducted as was the case with the Amended EIS concept design, nor were any flood level - dissipation time computations undertaken.</i></p>	<p>Sydney Metro to provide a detailed and verifiable project design that specifies "off-site" stormwater arrangements to be constructed to mitigate flooding impacts, including that of Ferrers Road and the Warragamba Pipelines corridor.</p> <p>Modelling, computations or equivalent to unequivocally demonstrate consent condition performance requirements should also be undertaken and retained as project compliance records.</p>	<p>The Blacktown City Council online portal was used to determine that the subject Lot for this SSI is not subject to Local Flooding or Mainstream Flooding. Therefore a flood assessment was not undertaken as part of the Detailed Design. In addition;</p> <p>E15 a): The SSI is located at the upper extremity of the minor overland catchment draining to Eastern Creek. Therefore, there is no change to levels upstream of the SSI of 50 mm in a 1% AEP rainfall event (or otherwise).</p> <p>E15 b): Catchment area draining to Warragamba Pipelines Corridor is unchanged by this SSI. Therefore, there is to be no increase in flood inundation levels in the Warragamba Pipelines Corridor. As shown in Figure 1 and Figure 2 below of Appendix A.</p> <p>E15 c): The statement around the drawing not specifying culvert and on-site detention parameters is inaccurate; The inlet and tank</p>

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					<p>sizing were determined through calculation to meet Blacktown Council's Permissible Site discharge criteria, and done in consultation with Blacktown Council. The output parameter, being the tank volumes, have then been provided to the contractor's tank builder, from which a detailed design was prepared. This detailed design has been provided to the IEA.</p> <p>Flows from the site are less than or match existing conditions and so no assessment of the impacts outside of the boundary were conducted or required.</p>
	As above	E15, as above	<p><b>Further to above</b></p> <p>As context, the SIS Amendment Report noted the revised stormwater and drainage design:</p> <ul style="list-style-type: none"> <li>• <i>Would prevent floodwaters from overtopping Ferrers Road in the area between Carpark C and D during a 1% AEP event.</i></li> <li>• <i>Reduces the diameter of the inlet pipe which directs water through the culvert underneath Ferrers Road between Carpark C and D</i></li> </ul> <p>Also,</p> <p><b>7.1.3 Potential amended flooding &amp; hydrology impacts.</b></p> <ul style="list-style-type: none"> <li>• <i>As a result of the proposed amendments, there would be a potential increase in flood levels for short periods upstream of the culvert underneath Ferrers Road between Carpark C and D during the 1% AEP flood event.</i></li> <li>• <i>Potential impact during the 1% AEP critical median storm, compared to existing conditions includes:</i> <ul style="list-style-type: none"> <li>○ <i>Minor increase on flood extent upstream of the culvert.</i></li> </ul> </li> </ul>		<p>Sydney Metro notes the additional context provided for NC6. Upstream of the culvert underneath Ferrers Road between Carpark C and D is within the SSI site boundary; any increase is a localised increase within the site boundary with the flows being slowed through the stormwater management system (drains, OSD) as they leave the site meaning there will be no increase to flooding levels outside of the site boundary.</p>

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			<ul style="list-style-type: none"> <li>○ Increase in flood depths by up to 1.1 metres, and a potential minor <b>increase</b> in the duration of inundation by about 12 minutes compared to <b>existing</b> conditions critical median storm event (25-minute duration)</li> </ul>		
NC7	E35	<p><b>SOILS ISSUE:</b> The permanent stockpile to be located on Lot 1 DP 1077822 must be designed and treated to ensure a stable landform and not impede existing drainage paths from the Warragamba pipeline corridor.</p>	<p><b>Non-compliant:</b> No definitive engineering <b>design</b> was available to specify and provide assurance that the permanent stockpile would be stable and not erode, causing <b>soil</b> or silt to impede existing drainage paths or enter the Warragamba pipeline corridor. This, at any stage, including <b>treatment</b> and establishment of turf, with potential risk of associated erosion due to irrigation or rain around this initial period.</p>	<p>Provide a formal final design specification for the permanent stockpile and surrounding lot. It is suggested that the standard of detail include but not be limited to:</p> <ul style="list-style-type: none"> <li>• Specific compaction details</li> <li>• Minimal material composition</li> <li>• 3-D profile and footprint to scale</li> <li>• Definitive maximum batter slope, height and volume</li> <li>• Drainage arrangements</li> <li>• Landscaping and vegetation treatment plus ERSED and maintenance arrangements for the establishment phase.</li> </ul>	<p>A formal design for the stockpile is contained within the relevant design packages which includes;</p> <ul style="list-style-type: none"> <li>• TfNSW Specification R44 which governs all earthworks within the SSI;</li> <li>• Landscaping design package</li> <li>• Construction Staging design package</li> <li>• 12D earthworks model</li> </ul> <p>R44 specifies compaction details, landscaping and vegetation treatment. This is also specified within the Turf landscaping drawing set Construction Staging drawings and earthworks model detail height, volumes and batters. The 12D earthworks model captures overall earthworks information not captured within the landscaping design package, including set out strings</p> <p>For clarity, material details will be added to the Construction Staging drawing notes before the end of July 2021.</p>
	As above	A35, as above	<p><b>Further to above.</b> An informal audit response around potential use of Transport for NSW specification R44 clause 7.4 compaction was provided, however this was not formally specified. Additionally, and as a result of the above-mentioned audit finding, a General Arrangement sheet dated 16 June 2021 was provided to supplement the November 2020 General Arrangement Landscaping drawing set. Additionally, a Technical Memo dated 22 June 2021 was also provided, this depicting overland drainage flow paths. Apart from nominating a batter slope and</p>		<p>Sydney Metro notes the additional context provided for NC7. The stockpile height has been updated to be 3.0m following a Consistency Assessment to address excess spoil on site. Drawing notes still refer to it as 2.5m and this will be updated before the end of July 2021.</p>

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			<p>2 conflicting stockpile heights (3.0m v 2.5m), the GA document essentially only depicted a 2-dimensional footprint. Finally, neither of the new documents provided a specification on how to achieve stability from a slump and erosion perspective.</p>		<p>Settlement has not been considered past the compaction criteria listed in the R44 spec as this is a non-trafficked area but rather a permanent stockpile, so localised settlements will have no impacts.</p> <p>Erosion will be prevented by the landscaping treatment shown in drawing L-209 (turfed).</p>
NC8.	E50	<p><b>WATER ISSUE:</b> The stockpile on Lot 1 DP 1077822 must be designed and constructed to ensure that no additional surface run off enters the Warragamba pipeline corridor.</p>	<p><b>Non-compliant:</b> In addition to consent condition E35-related Audit Findings regarding permanent stockpile design, there was no <u>construction</u> plan including surface <b>water</b> containment and drainage specification to (demonstrate and) ensure that surface water run-off would not enter the Warragamba pipeline corridor.</p>	<p>Recommendation as above, but additionally including:</p> <ul style="list-style-type: none"> <li>Contractor Inspection &amp; Test Plans (or equivalent) for the construction process to provide quality assurance and technical compliance records.</li> </ul>	<p>The SSI does not increase the catchment area around the Warragamba pipeline corridor, and as such does not increase surface run-off volumes that may currently enter the corridor. There is therefore no additional construction plan required separate to those detailed under E35.</p> <p>Abergeldie agree to undertake inspection and test plans for the construction process associated with completion of the stockpile on Lot 1 DP 1077822. This is the required Abergeldie process for works and will occur on the completion of the works scheduled for December 2021.</p> <p>The ITP will confirm that the stockpile has been constructed in line with the design including any requirements for grades, surface area and levels required.</p>
NC9.	REMM TTP4	<p><b>ROAD NETWORK PERFORMANCE</b> Construction site traffic to be managed to minimise movements along Ferrers Road and the</p>	<p><b>Non-compliant:</b> The Construction Traffic Management Plan did not address how Spoil Haulage truck movements would be scheduled to minimise impacts on Ferrers Road during peak periods, with the latest updated CTMP</p>	<p>Develop and implement a scheduling protocol to manage Spoil Haulage Truck movement frequency during peak periods.</p>	<p>Abergeldie will send a formal memo correspondence to all team members responsible for arranging deliveries to ensure planning for deliveries outside of peak traffic periods is implemented where possible. This will occur</p>



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		surrounding road network during peak periods.	<p>revision covering additional use of Ferrers Road including the Horsley Road roundabout. Said revision to the CTMP was also noted as missing the prior Compliance Matrix which indicated how and/or where planning obligations would be addressed.</p> <p><i>Note: Whilst Traffic Modelling indicated minor reductions in Loss of Service at Ferrers Road / Chandos Road and Ferrers Road / Horsley Road intersections during peak hours, this did not obviate compliance obligations with this REMM.</i></p>	Reinstate the Compliance Matrix missing from the updated Construction Traffic Management Plan revision E, ensure compliance specification for other planning obligations are still addressed, and describe REMM TTP4 arrangements accordingly.	<p>before 9 July 2021. This will occur before 9 July 2021.</p> <p>Correspondence will also go to Suppliers and subcontractors with this direction. This will also occur before 9 July 2021.</p> <p>Spoil haulage is a short-term exercise with a tight timeframe that has been assessed for the required truck movements.</p> <p>No traffic management is to be installed on Ferrers Rd that will impact traffic or change usual traffic conditions.</p>

## 5.2 Improvement Opportunities & Observations

ID	Reference	Compliance Requirement (abbreviated)	Independent Audit Observation	Improvement Opportunity	Response
IO1.	CoA E12 CoA C4 CoA C7	<p><b>Native vegetation clearing</b> Clearing of native vegetation must be minimised with the objective of reducing impacts to threatened ecological communities and threatened species habitat.</p> <p>The Flora &amp; Fauna Sub Plan also requires implementation to confirm the abovementioned.</p>	<p><b>Observation / Improvement:</b> Flora and Fauna Management Plan and/or CEMF clause 9.2 b (iii) obligations to produce post clearing surveys, update Geographical Information System files and validate the type and area of vegetation cleared had not been completed as yet for the Consistency-Assessment-approved native vegetation clearing beyond the EIS project footprint.</p>	<p><b>Improvement Required:</b> A post-clearing survey by the Ecologist and Surveyor should be commissioned sooner rather than later to provide compliance evidence, including but not limited to adequacy of retired biodiversity offset credits (E14).</p>	<p>Abergeldie commits to doing compliance checks immediately following the removal of trees, as well as the existing survey check following completion of works.</p>
IO2.	CoA C1	<p><b>Environmental Audits</b> The Construction Environmental Management Plan (CEMP) to ensure that performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 are implemented and achieved during construction.</p>	<p><b>Observation / Improvement:</b> Environmental Audits required by CEMP s5.4 had not been conducted by the Contractor, neither was a Project Audit Schedule developed.</p>	<p><b>Improvement Required:</b> Implement.</p>	<p>A project audit schedule will be developed by the project and audits as required under CEMP s5.4 incorporated for implementation moving forward. Completion end July 21.</p>
IO3.	CoA C9	<p><b>Monitoring Plan</b> Construction Monitoring Programs must provide:</p>	<p><b>Observation / Improvement:</b> The Monitoring Plan component of the Construction Soil &amp; Surface Water Management Sub Plan did not clearly detail how a representative <u>baseline</u> would be</p>	<p><b>Improvement Required:</b> Address and implement.</p>	<p>Abergeldie commit re reviewing and implementing changes to the SSWMP by the end of July 21.</p>

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		a) details of baseline data available; b) details of baseline data to be obtained and when.	established beyond the single site selection and a single water quality sample undertaken just prior to construction commencement.		
IO4.	CoA C9 (g) CoA A1 EIS	<b>AQ Monitoring Plan Reporting</b> The Proponent must carry out the SSI (generally) in accordance with the Sydney International Speedway Environmental Impact Statement.	<b>Observation / Improvement:</b> Construction Air Quality Management Sub Plan Tables 6 and 7 Air Quality Indicator values differ to that predicted in the EIS tables 9.4 to 9.7.	<b>Improvement Required:</b> It is suggested that AQ indicators and predicted outcomes are more clearly defined in the CAQMP Sub plan and/or comparisons between elected and predicted values evidenced in Quarterly Air Quality Monitoring Reports stated to be publishable on the project website.	Abergeldie commit to reviewing the difference between elected and predicted values evidenced in Quarterly Air Quality Monitoring Reports. To be completed on the next quarterly monitoring report scheduled to be completed by 16 July 2021.
IO5.	CoA E51	<b>Water issue:</b> Should damage to the Warragamba pipeline corridor or associated bulk water supply infrastructure occur as a result of the construction of the SSI, the Proponent must either (at the landowner's discretion): (a) compensate the landowner for damage so caused; or (b) rectify the damage to restore the road to at	<b>Observation / Improvement:</b> Whilst the Construction Contractor was aware of Condition E51, and this responsibility was identified in a Compliance Obligations Spreadsheet, the executed version of Schedule 20 to the Sydney Metro contract appeared to have missed this obligation.	<b>Improvement Required:</b> Confirm that accountability obligations for identified WaterNSW infrastructure damage have been contractually formalised with the Contractor, including a liabilities period.	Sydney Metro notes that acceptance of the revised Planning Approval allocations was not formalised through Teambinder, but through email. This was an oversight which has now been rectified by formalising this through Teambinder. To note, the contract document itself does not get amended as a result of this; the GC21 contract document is read in conjunction with the suite of contractual notices and

		least the condition it was in pre-construction.			documentation issued through the Teambinder portal.
IO6.	REMM SSW5	<p><b>Onsite surface water monitoring</b> An onsite surface water monitoring program to be implemented to observe any changes in the quality of runoff from the project site prior to discharge.</p>	<p><b>Observation / Improvement:</b> The Construction Soil &amp; Surface Water Management Sub Plan did not provide detail of an onsite surface water monitoring program in the Monitoring Plan component of the CSSWMP, only a commitment that visual observations would be conducted during rain events at off-site locations identified in figure 5.</p>	<p><b>Improvement Required:</b> Implement and collect records from identified off-site locations during rainfall events.</p>	Abergeldie will review the onsite surface water monitoring program with it's ERSED specialist and update the program to deliver the auditor recommendations by the end of July 2021.
IO7.	N/A	<p><b>Compliance records</b> <i>No specific consent requirement -audit observation related to compliance assurance facilitation and business efficiency.</i></p>	<p><b>Observation:</b> Compliance record retrievability and/or Sydney Metro awareness of evidenced-based compliance record keeping was observed to be a project weakness. Also, stakeholder communications and/or consultation evidence was often dependent on individual emails, rather than a formal project filing system.</p>	<p><b>Improvement Required:</b> Implement Speedway Compliance Monitoring &amp; Reporting Program requirements for "Evidence Based Record Keeping".</p>	Sydney Metro uses Teambinder software and Consultation Manager software for formal project communications and record keeping. Some evidence shown to the IEA was email evidence. Sydney Metro will assess whether these systems were underutilised at the time the audit was undertaken by 15 August 2021.
Obs1	A1, A2, A3	<p><b>Consistency Assessments</b> The project to be carried out and be consistent with the terms of the planning approval.</p>	<p><b>Observation:</b> Observed Consistency Assessments were mostly reliant on identified status quo mitigation measures, with no additional process to confirm (as is the case with specific consent conditions and/or REMMS) that impacts assessed as "consistent" actually manifested</p>	<p><b>Consider:</b> Collect compliance evidence to demonstrate that impacts were as actually consistent as predicted.</p>	Consistency Assessments are utilised by proponents to demonstrate the planning approval does not need to be modified in accordance with Section 5.25 of the EP&A Act- 'modification of an approval means changing the

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			<p>as intended during construction and beyond, for example:</p> <ul style="list-style-type: none"> <li>• <i>“Vegetation clearance alongside Ferrers road of between 5 – 10 metres wide would have no visual impacts, being consistent with amenity observed from Viewpoint 4”.</i></li> <li>• <i>“There is spare capacity at the Ferrers Road / The Horsley Drive intersection to accommodate additional construction traffic during the weekday morning and evening peak hours”.</i></li> </ul>		<p>terms of the approval, including revoking or varying a condition of the approval or imposing an additional condition on the approval’. The Consistency Assessments undertaken identified no conditions of the original approval would be required to be modified or any additional conditions of approval would be required, however additional mitigation measures can be included within the Consistency Assessment to ensure any additional impacts are adequately managed.</p> <p>No additional compliance is deemed necessary to ensure compliance with the planning approval as the impacts may vary (as outlined within Consistency Assessments) however the management of the impacts remains the same or have additional mitigation measures applied to them.</p> <p>Due to the complex nature of State Significant Infrastructure Projects (under Division 5.2 of the EP&amp;A Act), the aim of a Consistency</p>

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					Assessments is not to demonstrate impacts are consistent with the original assessment, but to ensure no modification of the planning approval is required.
Obs2	CoA A22 (i)	<b>ER Monthly Reports</b> Environmental Representative Monthly Reports to include information set out in the DPIE Environmental Representative Protocol.	<b>Observation:</b> The ER Monthly Report did not evidence a summary of Community Consultation undertaken by the proponent and complaints received as required by ER Protocol s2.7.  <u>Prior to finalisation of this Audit Report:</u> <i>The ER evidenced implementation missing Protocol information in the ER April 2021 Report to DPIE, plus requested Sydney Metro to add this as an item in fortnightly Environment &amp; Approvals meetings.</i>	No further action required	No response required
Obs3	REMM GHG 1  EIS Chapter 5  PAR	<b>Greenhouse gas impacts</b> The EIS predicted that inclusion of solar power infrastructure (with battery storage/backup) for lighting of external areas including carparks would result in major emissions savings, avoiding potential emissions of about 60,000 tCO <sub>2</sub> e over the <b>life</b> of the project and a GHG reduction of about 63% over 50 years.	<b>Observation:</b> Whilst lighting design was still in progress and ecologist advice on light spill minimisation from a nocturnal fauna perspective was awaited, it was noted that only one (1) carpark i.e. Carpark C would be solar powered, with the remaining likely to be mains supply for reliability reasons.	<b>Consider:</b> With a view to EIS consistency, assessing and reporting on predicted impacts documented in the EIS (a PAR requirement) and providing REMM compliance evidence, it is suggested that Sydney Metro accurately confirm or update final GHG performance prediction as a project compliance record.  This to be reviewed at the next Independent Environmental Audit.	A Consistency Assessment has now been prepared and approved which demonstrated a revised GHG operational assessment. The Conditions of Approval and REMMs have been reviewed and additional measure has been proposed within the Consistency Assessment to ensure impacts are adequately managed.

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		Further to the above, the SIS Amendment Report required that <b>further</b> efficiency be considered during detailed design, this being a REMM obligations.			