

INDEPENDENT AUDIT OF PLANNING APPROVAL REQUIREMENTS FOR THE SYDNEY INTERNATIONAL SPEEDWAY SSI PROJECT



Screening of imported VENM tunnelling material.

Proponent:	Sydney Metro
Project:	Sydney International Speedway
Scope:	SSI 10048 Planning Approvals
Works / Process:	Design and Construction
Auditee(s):	Abergeldie Complex Infrastructure Contractors, and Sydney Metro

Audit Organisation:	QEM Consulting Pty Ltd
Auditor:	Larry Weiss
Registration	Exemplar Global EMS Auditor Accreditation no. 12355
Audit References:	QEM 1803-IEA-024
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1.0 EXECUTIVE SUMMARY

An Independent (Environmental) Audit was conducted to assess Sydney Metro (proponent) compliance with State Significant Infrastructure Approval conditions for the Sydney International Speedway project. As further context, Project Approval SSI 10048 Condition A29 and the associated PAR (Department of Planning, Industry and Environment's Independent Audit Post Approval Requirement) mandates the format, frequency and procedures for conducting this and subsequent audits.

Aside from compliance with consent conditions, the audit scope included a comparison of actual environmental and community impacts with those predicted in the project Environmental Impact Statement (EIS) plus an assessment of environmental management and related performance. The PAR also required consultation with key stakeholders as input into the scope, noting the entirety of design and construction consent conditions informing the assessment in the first instance.

The audit was confined to Proponent and Construction contractor obligations and activities over the first 3 months of construction.

General / overview

In summary, the project was performing to a high standard, facilitated by experienced and committed site environment and site supervisory personnel who were actively and ongoingly involved. Key issues including air quality (dust) and surface water / sediment had been very well-managed despite large surface area exposure (resulting from clearing / earthworks), unseasonal rain, and a significant east coast flooding event. Additionally the audit confirmed there were no complaints, no reportable incidents or any adverse stakeholder feedback for the temporal timeframe of the assessment period. Otherwise, key findings specific to audit scope and objectives follow.

Compliance Management

In general, there was a reasonable degree of compliance with consent conditions including Revised Environmental Mitigation Measures. Compliance included practical on-the-ground implementation of controls and mitigation measures relating to soil and surface water, traffic control, air quality (dust), noise, waste and unexpected asbestos finds. Apart from the non-compliances relating to fauna and flora preservation, other non-compliances mostly related to evidence-based demonstration of performance objective by design in minimising off-site water flows and flooding. Lastly a few administrative non-compliances raised related to untimely submissions of approval requests, notification and/or deliverables to the Planning Secretary.

Environmental impact predictions

With due cognizance of the relatively short period of initial construction, there had been no significant construction impacts, with project and site performance mostly meeting or exceeding intended outcomes. Dust impacts appeared lower than expectations, but data was still be consolidated into a quarterly performance report.

Vegetation clearing, especially of endangered ecological communities, was higher than predicted however, but awaiting formal confirmation including adequacy of retired biodiversity offset credits.

Moving forward, an off-site spoil reuse decision rather than cut-and-cover, or permanent stockpiling would increase the length and duration of movements on the local road network. Traffic modelling appear to indicate that minimal impact though. As positive, there was also potential to reduce the size of the permanent stockpile as a result, the stockpile in so-called Pipeline Park the subject of a stakeholder submission and concern.

Environment Management

Environmental Management, particularly that of the site and construction works was of commendable high standard. Construction Environmental Management Plans / subplans were established and implemented from construction commencement, supported by contractor recordkeeping systems for related management and compliance information. Aside from discrete verification records such as that of discharge water quality, attended noise monitoring and site inspections, Monitoring Programs were weakness though, with a number of improvement opportunities raised. Otherwise, contractor systems utilised to monitor and/or manage dust, noise, waste, off-site movements, and plant / equipment maintenance appeared effective in the achievement of required environmental management performance outcomes.

Final words

In conclusion, construction of the Sydney International Speedway project was generally in accordance with EIS predictions and Infrastructure consent conditions. Some weaknesses were noted in the management of compliance including evidence-based compliance records, especially design. Programs of environmental monitoring plus aspects of fauna impact mitigation also needed to be addressed.

----- **END OF SUMMARY** -----

2.0 AUDIT BACKGROUND & OBJECTIVES

2.1 Purpose & context

The purpose of this Independent Environmental Audit was to assess compliance and implementation of Project Planning Conditions applicable to the Sydney Metro (Sydney International Speedway) State Significant Infrastructure project.

As further context, Project Approval SSI 10048 Condition of A29 requires that Independent Audits of the development be conducted in accordance with the NSW Department of Planning, Industry and Environment's Independent Audit Post Approval Requirements document (May 2020), or PAR in abbreviated terms.

In the absence of audit frequency stated in the conditions of consent, the PAR specifies that independent audits must be undertaken within 3 months of construction commencement and every 26 weeks thereafter.

2.2 Project Background

On 23rd December 2020, the NSW Minister for Planning and Public spaces approved the Sydney International Speedway project comprising a speedway track for cars and bikes plus related infrastructure including a grandstand, open terrace seating and car parking.

The project is located within the Western Sydney Parklands Precinct 5: Eastern Creeks Motor Sports within the Blacktown City Council jurisdiction. The precinct is administered by the Western Sydney Parklands Trust, with additional key stakeholders including adjacent Sydney Dragway (dust impact potential), WaterNSW Prospect Reservoir and Warragamba pipeline (soil and water impact potential).

Although the project site is claimed to be located within a highly modified landscape, some clearing required for construction would affect threatened ecological communities, as would operational noise and lighting impacts relating to nocturnal and/or roosting species.

2.3 Audit Objectives

Consistent with the PAR the key audit objectives were to:

- a) assess compliance with the requirements of Project Approval SSI 10048;
- b) assess the project performance of the SSI against the predictions documented in the Environmental Impact Assessment (EIS), including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development; and
- c) review the effectiveness of Environmental Management of the SSI.

2.4 Audit Scope

The Audit Scope included design and construction obligations required of the following entities:

- 1) SSI Proponent (Sydney Metro) - overall planning condition compliance including design output and performance requirements and by contracted designer, Turnbull Engineering.
- 2) Construction contractor (Abergeldie Complex Infrastructure) - planning conditions including implementation of EIS, site and project mitigation measures during the construction phase of the project.

Operational consent conditions relating to scheduled motorsport events occurring during the construction phase were not assessed in detail. Also, the audit scope did not include obligations required by other entities having precinct, project and planning approval obligations.

The audit also excluded Low Impact Works defined in the SSI 10048 Infrastructure Approval, including site establishment and minor clearing of native vegetation.

2.5 Audit Period

The temporal timeframe subject to assessment during this audit was three (3) months from mid-January to mid-April 2021.

2.6 Terminology & Abbreviations

The following abbreviations and definitions apply throughout this report:

Item	Explanation
BCC	<i>Blacktown City Council</i>
CEMF	<i>Construction Environment Management Framework</i>
DPIE	<i>Department of Planning, infrastructure and Environment</i>
EESG	<i>Environment Energy & Science Group</i>
ER	<i>Environmental Representative</i>
ERSED	<i>Erosion and Sediment</i>
IA or IEA	<i>Independent (Environment) Audit or Auditor</i>
OOH	<i>Out of Hours</i>
PAR	<i>Post Approval Requirements (DPIE document)</i>
REMM	<i>Revised Environmental Management Measure</i>
SSI	<i>State Significant Infrastructure</i>
SIS	<i>Sydney International Speedway</i>
WSPT	<i>Western Sydney Parklands Trust</i>

3.0 AUDIT METHODOLOGY

3.1 Selection and endorsement of Auditor(s)

The Sydney Metro proposed Auditor from QEM Consulting Pty Ltd was accepted and endorsed by the Planning Secretary as evidenced in Annexure 1. The proposed Independent Auditor was the only auditor utilised for this audit, with no technical specialists providing input.

3.2. Audit Scope development

At a high level, the audit scope was developed utilising inputs derived from pre-attendance of Project Environment & Approvals meetings, review of construction status and information posted on project websites plus consultation with DPIE and other stakeholders, the latter evidenced in Annexure 2. In summary, stakeholders consulted reiterated previous feedback captured in post EIS Submissions and the Amendment Report.

WaterNSW, in particular, pointed out conditions including flooding, siltation and additional water flows relating to potential impacts or damage to their land, assets and infrastructure.

3.3. Audit Process and Methodology

The audit including scoping and planning and conduct was undertaken in accordance with the principals of ISO 19011:2018 – Guidelines for Auditing Management Systems.

Audit Framework and Checklist tools were developed (and circulated) based on scoping information (above) and Planning Approvals documentation referenced in section 3.8 further. The audit process comprised an off-site desktop review, preparation of an audit tools (above), a site inspection, onsite desktop audits with the Proponent, Constructor and Environmental Representative, plus MS Teams interviews where necessary and suitable. Further review sessions were needed as a result of information needing to be submitted post audit.

The actual audit took place over more than 3 weeks, comprising a site inspection and several audit interview sessions thereafter. Commencement of the site inspection was necessitated given a partial site shutdown and relinquishing of temporary car parking areas due to a scheduled motorsport event over the upcoming Easter weekend.

The site inspection encompassed the entire project footprint and associated works including the so-called Pipeline Park associated with the (eventual) permanent stockpile, the Environmental Representative attending, with that functions weekly inspection conducted in parallel, at the same time.

The Easter Holiday period and East Coast flood recovery efforts did somewhat delay subsequent audit interviews and compromise audit continuity and crosschecking though. Lastly, no Auditor requests to observe any area of the project/site were denied nor were there any safety-related risks preventing access.

3.4 Documentation audited

The following key documents and approvals were assessed and/or referenced during the audit process:

Document / Approval	Version
Management Plans & Programs	
Abergeldie Construction Environmental Management Plan	12/01/2021
Abergeldie Construction Traffic Management Sub Plan (Updated during the audit period)	05/01/2021 (03/04/2021)
Abergeldie Construction Flora & Fauna Management Sub Plan	12/01/2021
Abergeldie Construction Air Quality Management Sub Plan	12/01/2021
Abergeldie Construction Soil & Surface Water Management Sub Plan	12/01/2021
Abergeldie Community Communication Strategy	27/11/2020
Planning Approval documentation	
Sydney Metro Construction Environmental Management Framework	V4.0 23/1/2020
Environmental impact Statement Volumes 1 and 2	August 2020
Sydney International Speedway Submissions Report	November 2020
Sydney International Speedway Amendment Report	November 2020
EIS Technical Paper 1 - Traffic, Transport and Parking	30/07/20
EIS Technical Paper 4 - Air quality	30/07/20

3.5 Auditees and Participation

Audit Attendance Register of Annexure 4 reflects construction contractor's personnel interviewed on site during the audit, including Kelie Pittaway, Abergeldie SIS Environment Manager

In addition, the following project personnel were also interviewed:

Name	Organisation	Position
Todd Brookes	Sydney Metro	Associate Director Sustainability, Environment & Planning Approvals
Matthew Marrinan	Sydney Metro	Senior Environment Manager
Mirjana Vidovic	Sydney Metro	Senior Communications Manager
Tara Larkin	Sydney Metro	Community Place Manager
Lorraine Chirawu	Sydney Metro	Senior Project Manager
Ayoub Dayoub	Sydney Metro	Project Engineer
Boutros Abd	Sydney Metro	Construction Manager
Jessie Strange	Sydney Metro	Planning Approvals Manager
Joseph Maklouf	Abergeldie	Senior Project Manager
Jo Robertson	HBI	Environmental Representative

3.6 Compliance status descriptors

The compliance status of each condition of approval listed in the Appended Audit Tables was determined utilising descriptors extracted from the DPIE Independent Audit Post Approval Requirements document, these repeated below:

Compliance 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.
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.
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.

During the audit process, the PAR recognises that the Independent Auditor may note and document observations, including opportunities for improvement in relation to compliance requirements, environmental management, or any other aspect of the project.

Note however that such observations or notes are in addition to the above-mentioned PAR compliance status descriptors assigned to each compliance requirement, these described by QEM, not DPIE, below:

Status	Explanation
Observation	Documented requirement and/or implementation issue which may not strictly affect required performance or compliance outcomes. Observations could be an early indication of potential non-compliance and/or an adverse performance outcome.
Improvement Opportunity	A suggestion to implement a good or better practice to improve efficiency, further reduce exposure to risk, improve information management or facilitate the demonstration of compliance and/or performance outcomes.

3.7 Audit disclaimer

Notwithstanding due care, audit methodology and process, this report does not purport to be an absolute or definitive confirmation or otherwise of actual or future or technical compliance. Due to audit evidence observed, requested, provided (or withheld), non-compliances and improvement opportunities may not have been detected or identified. Consequently, intended compliance and performance outcomes cannot be assumed for the entire project timeframe assessed or for future works, activities, and events.

4.0 AUDIT FINDINGS

Audit commentary and findings described in the section are substantiated by objective evidence (or the absence thereof) as detailed in the Appended Audit Finding tables.

4.1. Regulatory notices, penalties or prosecutions

Auditees indicated that there were no notices, orders, penalties or prosecutions related to the project and consent during the temporal audit timeframe described in section 2.5 previously. This audit did not detect any information to the contrary.

4.2. Previous audit recommendations

Given this was the first Independent Environmental Audit, no actions to prior audit findings resulting in recommendations required verification during this audit.

4.3. Compliance performance summary

This table provides a summary of compliance against audit criteria and area of focus, indicating the number of actions required:

Consent Condition	STATUS		
	Total	Not triggered	Non-Compliant
Part A Administrative Conditions	37	21	3
Part B Community Information and Reporting	6	2	1
Part C Construction Environmental Management	13	0	1
Part D Operational Environmental Management	15	15	0
Part E Key Issue Conditions	51	15	3
Revised Environmental Mitigation Measures	29	0	1

Note 1: Compliance and/or non-compliance is limited to demonstrated evidence referenced in Appendices further.

Note 2: Totals applicable to commitments assessed only, not the entire suite of 85 documented REMMs.

Audit Findings are classified (and repeated from 3.6 previously) as follows:

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.
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.
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.

4.4 Non-compliances

Audit Findings classified as non-compliances are summarised below, with additional details found further in Recommendations section 5.1 are relevant Appendices:

- NC1. Approval for the Independent Auditor was not formalised in a timely manner and/or prior to commencement - Condition of Approval A30
- NC2. This Independent Audit report was not completed in a timely manner to enable compliance with the 2-month submission deadline - Condition of Approval A32
- NC3. Independent Audit non-compliances identified during the audit process and/or in the draft Audit Report were not notified to the Planning Secretary within 7-days of awareness - Condition of Approval A35
- NC4. The Construction Noise & Vibration Impact Statement had not been published on the project website as required - Condition of Approval B6 (e).
- NC5. Replacement hollow or nest boxes had not been provided in a timely manner and as prescribed - Condition of Approval C7.
- NC6. A detailed design and supporting data demonstrating required flooding performance objectives would be achieved during operations was not available as compliance evidence - Condition of Approval E15.
- NC7. There was no formal design for the Permanent Stockpile to address stability and potential soil and drainage issues - Condition of Approval E35.
- NC8. There was no formal design and construction assurance plan for the Permanent Stockpile to address surface water run-off to the Warragamba Pipeline during construction and subsequent phases of vegetation establishment and associated maintenance - Condition of Approval E50.
- NC9. Scheduling of additional spoil haulage trucking to minimise peak period impacts had not been addressed, especially given changed arrangements extending along Ferrers Road to the Horsley Road intersection – REMM TTP4.

4.5 Improvement Opportunities

Several Opportunities for improvement (and observations) are detailed in the Recommendation section 5.2 and Appendices further.

In general, these relate to requirements of the CEMP and associated Monitoring Plans and Subplans requiring further detail and/or implementation by the Construction Contractor.

Regarding the Proponent, there was room for improvement in compliance related recordkeeping including evidencing that stated mitigation measures in Consistency Assessments demonstrated that the SSI continued to be in accordance with approvals. It was also noted that some consent approval milestones or deadlines were not always been achieved and/or requiring approved extensions of time. This perhaps resulting from tight delivery scheduling challenges and/or insufficient allowance for planning and execution.

4.6 Project Impacts (actual v predicted)

Project environment and community impacts discussed below are limited to construction activities; the extent of available performance information; and the relatively short 3 months of construction duration.

SSI project predictions found in the various chapters of the Environmental Impact Statement indicated minor impacts for traffic, transport and parking; no daytime noise impacts; low (1dBA NML exceedances) affecting noise catchments NCA 01 and 02 during night works; no unacceptable change in air quality beyond the project footprint generally; no expectations for groundwater interception; and minor adverse impacts relating to visual amenity.

With respect to biodiversity the EIS indicated that threatened ecological communities would be impacted by approximately 630 m² vegetation clearing: with no significant impact on the Southern Myotis threatened fauna species noting however that foraging habitat could be affected by clearing. Additionally, there was potential for light spill during night works which could affect identified nocturnal and roosting bird species. As a result of EIS submissions, the Sydney International Speedway Amendment Report indicated that design changes to reduce flooding potential would reduce vegetation clearing by approximately 40%. During construction however, changes to stormwater batter chutes (Appendix G, Photo 8) leading to culverts beneath Ferrers Road estimated around 532 m² of additional vegetation clearing according to Consistency Assessment undertaken. In total, this represented an approximate 10% increase in clearing of Threatened Ecological Community (TEC) Cumberland Plain Woodland in the Sydney Basin Bioregion. Regarding the Southern Myotis (threatened species) foraging habitat, clearance would increase by 163 m² from 226m² representing more than a 70% increase on Amendment Report predictions. Actual clearance was unknown though, with conduct of a required clearance survey an identified Improvement Opportunity of section 5.2 further. Apart from the original EIS batter chute footprint, the above-mentioned had resulted in a somewhat larger project footprint though.

The EIS predicted construction dust impacts at the nearby Sydney Dragway, specifying focused construction controls and mitigation measures and monitoring programs, with predicted impacts extracted from Chapter 9 as follows:

Table 9-4 Predicted annual PM₁₀ concentrations (µg/m³), construction

Receiver	Predicted project contribution (µg/m ³)		Background (µg/m ³)	Cumulative (µg/m ³)		Criterion (µg/m ³)
	Construction 7am–6 pm	Construction 24 hours		Construction 7am–6 pm	Construction 24 hours	
R1	0.1	0.1	19	19.1	19.1	25
R2	<0.1	0.1		<19.1	19.1	
R3	<0.1	0.1		<19.1	19.1	
R4	<0.1	0.1		<19.1	19.1	
R5	<0.1	0.1		<19.1	19.1	
Sydney Dragway	Up to 2.0	Up to 6.2		21.0	25.2	n/a

Table 9-5 Predicted annual PM_{2.5} concentrations (µg/m³), construction

Receiver	Predicted project contribution (µg/m ³)		Background (µg/m ³)	Cumulative (µg/m ³)		Criterion (µg/m ³)
	Construction 7am-6 pm	Construction 24 hours		Construction 7am-6 pm	Construction 24 hours	
R1	0.01	0.03	7.7	7.71	8	8
R2	<0.01	0.02		<7.71	7.9	
R3	<0.01	0.02		<7.71	7.9	
R4	<0.01	0.02		<7.71	7.9	
R5	<0.01	0.01		<7.71	7.9	
Sydney Dragway	Up to 0.3	Up to 11		8	8.8	n/a

Table 9-6 Predicted annual TSP concentrations (µg/m³), construction

Receiver	Predicted project contribution (µg/m ³)		Background (µg/m ³)	Cumulative (µg/m ³)		Criterion (µg/m ³)
	Construction 7am-6 pm	Construction 24 hours		Construction 7am-6 pm	Construction 24 hours	
R1	0.1	0.1	40	40.1	40.1	90
R2	<0.1	0.1		<40.1	40.1	
R3	<0.1	0.1		<40.1	40.1	
R4	<0.1	<0.1		<40.1	<40.1	
R5	<0.1	<0.1		<40.1	<40.1	
Sydney Dragway	Up to 4.5	Up to 11.7		44.5	51.7	n/a

Table 9-7 Predicted deposited dust (g/m²/month), construction

Receiver	Predicted project contribution (g/m ² /month)		Background (g/m ² /month)	Cumulative (g/m ² /month)		Criterion (g/m ² /month)
	Construction 7 am to 6 pm	Construction 24-hours		Construction 7 am to 6 pm	Construction 24-hours	
R1	0.01	0.01	1.7	1.71	1.71	4
R2	0.01	0.01		1.71	1.71	
R3	0.01	0.01		1.71	1.71	
R4	<0.01	<0.01		<1.71	<1.71	
R5	0.01	0.01		1.71	1.71	
Sydney Dragway	Up to 0.5	Up to 0.9		2.2	2.6	n/a

No dust data was collected and/or available beyond the project boundary given low predicted offsite impacts, but real-time PM_{2.5} and PM₁₀ performance for the Sydney Dragway and related monitoring points appeared to align with predictions in the tables above i.e. PM_{2.5} was trending between 2 and 6µg/m³ and PM₁₀ around 10µg/m³ plus initial dust deposition data was around 0.9g/m²/month. Statistical performance analysis and/or a quarterly Monitoring Program Report required by the Air Quality Monitoring Program of condition C8 had not been completed at the time of the audit, being an Improvement Opportunity of section 5.2 further.

Construction traffic, transport, parking and egress impacts had been minimised to the extent predicted by the EIS design, although upcoming changes to spoil management was going to increase the impact on local road networks given length of public road usage increasing from around 0.5km to an initial 7km (Wallgrove Road / Horsley Drive) followed by another 14km to Erskine Park. One-way movements were predicted in the EIS to be 592 vehicles in total was revised downwards in the SIS Amendment Report to 95 vehicles, but at the time of this audit was predicted by a Consistency Assessment to increase to 300 one-way movements in total.

Regarding spoil generation, the EIS indicated that about 100,000 m³ of excess cut material would either be used for fill or formed into a permanent landscaped mound. An EIS stated opportunity to use excess spoil on nearby projects and reduce the permanent mound was about to be realised, this material required for another Sydney Metro project (precast yard).

Otherwise, noise impacts were low as predicted, based on work activities to date and attended noise monitoring results. There had only been a few off-site surface water discharges, these controlled to be within Water Quality guideline objectives. Also, surface waters leaving site during an extreme rain event had been of relatively low volume.

Further to the above, EIS submissions addressed by the Sydney International Speedway Amendment Report mostly indicated no changes to potential impacts from said amendments, and some improvements as a result of accommodating submissions. The amended project footprint had increased slightly as discussed earlier in the section, predominantly around the stormwater batter chute footprint.

4.7. Environmental Management Performance

4.7.1 Stakeholder feedback, complaints, and incidents

Given the commercial as opposed to residential proximity of the project, there was no Community Consultative Committee per se. Instead, an Eastern Creek Motor Sport Precinct Control Group (PCG) and SIS Site Project Control Group had been established, with minutes of meetings reflecting stakeholder inputs, actions undertaken and no obvious areas of concern.

With respect to Stakeholder Consultation required by the PAR, there were four (4) responses to solicited requests for input into the audit process plus feedback on the development performance since project commencement. WaterNSW reiterated submissions made during the EIS consultation period and informing the subsequent Infrastructure Approval. Sydney Water indicated the short response timeframe was of insufficient time, and DPIE would not comment given that the Independent Auditor had not been endorsed by the Planning Secretary at the time (Condition A30). Both instances were symptomatic examples of compliance deadlines being compromised by tight delivery scheduling and insufficient planning and execution time.

Lastly, WSPT as landowner - in response to a posed question - confirmed as not observing any off-site environment / community impacts differing to those predicted or expected.

And finally, with respect to lagging indicators of project performance, there had been [no reported complaints or significant incidents](#) during the temporal audit timeframe defined in section 2.5 previously, and [this](#) audit did not detect any information to the contrary.

4.7.2 Document adequacy & implementation

Consent condition C1 and C4 defined Management Plans referenced in section 3.4 of this report had been developed and updated, these incorporating a Monitoring Program (condition D9) component where required. All Management Plans were assessed as being implemented as and when required, but also ongoingly such as dust mitigation, plus surface water and ERSED management.

Air Quality, Fauna & Flora and Soil & Water Sub plan required mitigation measures, controls and monitoring requirements around identified environment and community impacts were assessed as mostly implemented. Documented content was appropriate to the SIS project and reflective of required Planning Approvals requirements, however some superfluous information appeared to have been carried over in material used from prior projects which was occasionally confusing. Also new practices implemented since construction commencement and some stakeholder feedback needed inclusion, and a few obligations resulting from consent conditions and stakeholder submissions were simply stated such (or as objectives) without enabling process details. The contractor indicated an upcoming 3-monthly and 6-monthly review of said plans but was awaiting Independent Environmental Audit findings prior to finalising the updates.

The Construction Traffic Management Plan although addressing most consent conditions was subject to initial and ongoing consultation with a large number of stakeholders, which was a positive. Unfortunately, the document had become quite unwieldy and almost impractical to use as a result of requests for inclusions, containing numerous outputs such as Traffic Control Plans and attaching references including the Communication Community Strategy and the entire Infrastructure Approval document. As a result this was somewhat of a distraction from "management" measures content which was occasionally quite minimalistic. Given the decision to move excess spoil to another Sydney Metro West site, the CTMP was updated during the Independent Audit, however revision E exacerbated the navigability and impracticality of the document which expanded from 218 to 391 pages of 21MB size. Important content appeared to have been omitted including the Planning Approval Compliance Matrix - refer to the REMM TTP4 non-compliance in section 5.1 further. Again, somewhat superfluous additions had been attached such as a Bushfire Management Plan plus the Precast CTMP required by a separate Approval.

Lastly, a Communication Community Strategy had been developed by the contractor providing additional information to that covered in the Sydney Metro Overarching CCS of EIS volume 2.

This was commendable given the development of an additional document was not directly a consent requirement with condition B1 only requiring implementation of the Sydney Metro Overarching CCS. The contractor CCS was assessed as practical (very little “padding”) and implemented.

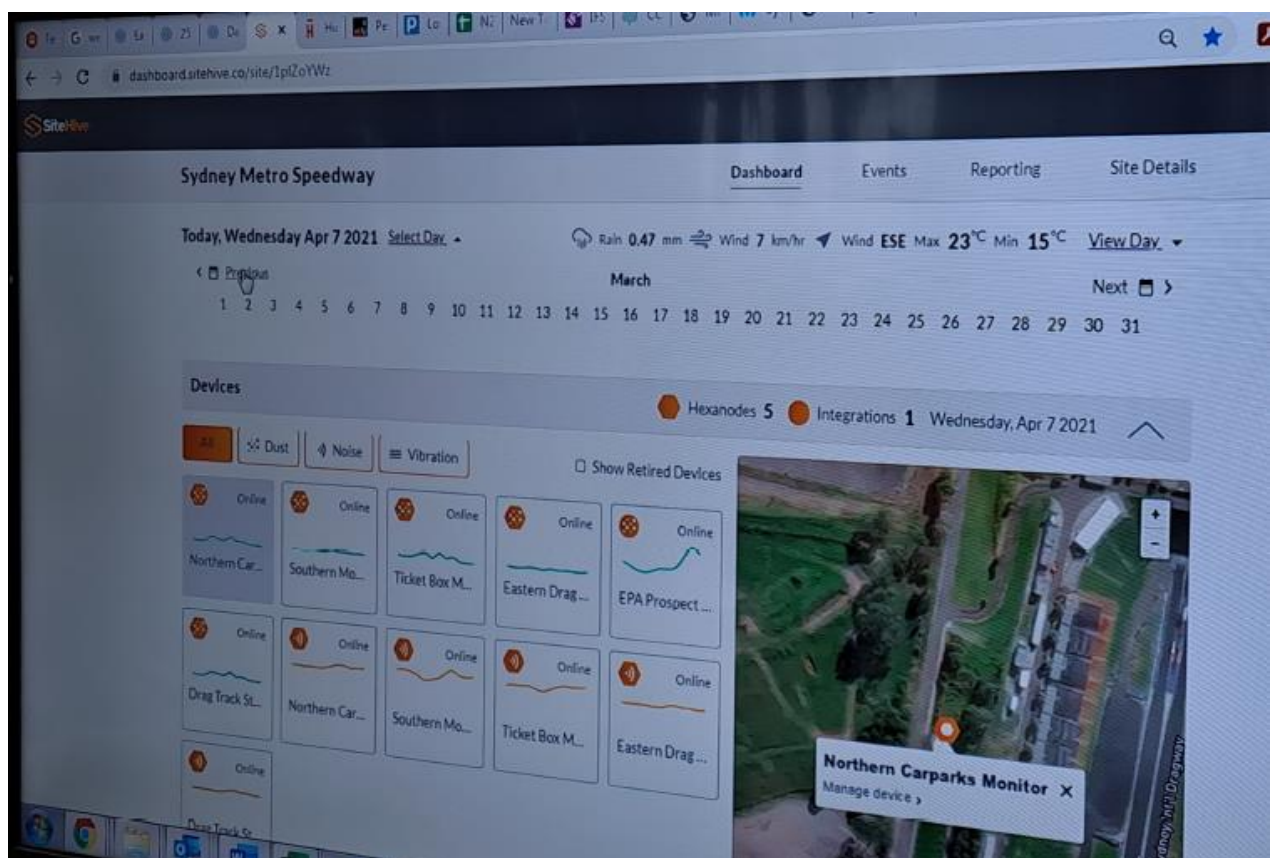
In summary, and CTMP aside, documentation including associated checklists and forms was determined to be adequate, appropriate and providing a good platform for environmental management and required performance outcomes.

4.7.3 Key Strengths

Key project environmental management strengths were undeniably the acumen experience and commitment of the Environmental Representative and Contractor’s Environment Manager, Environmental Coordinator and Site Superintendent. The latter’s hands-on implementation of practical measures especially ERSED and dust mitigation controls certainly contributed to positive performance outcomes as alluded to earlier in this report.

Other environmental and project strengths included but were not limited to:

- The “Site Hive” real-time IT solution monitoring system used to monitor dust levels from various locations around the site including the Dragstrip. Additional performance parameters such as noise were also used, with functionality enabling graphical representation of data, interrogation through CCTV cameras and sound files, alarms set to trigger points, plus graphics and reporting.



Site Hive dashboard showing Northern Carpark Monitor and other locations, including EPA Prospect feed.

4.8 Site inspection

The project works, development footprint and selected perimeter components were physically inspected during an extended walk accompanied by the Environmental Representative as well as the contractor's Environment Manager, Environmental Coordinator and Site Superintendent.

Speedway carparks were at varied stages of material removal / leveling / completion, plus segments of the Speedway precinct retaining wall alongside Ferrers Road (west of site) were being assembled. Other activities including mechanical screening of imported engineering fill front cover of this report), spoil movement, backfilling and minor stormwater works.

In summary, the site presented very well on the day, with Environmental Representative weekly site inspections confirming ongoing compliance and control over the temporal audit timeframe. It was evident that significant time, material, expense and effort was allocated to ERSED control establishment and maintenance. Despite heavy rainfall exceeding 400mm between 16-23 March earlier the month, said controls were evidenced and confirmed as substantially retaining surface waters on site.

Further to the above, controls and mitigation measures evidenced compliance with documented Environmental Management Plans and/or REMMs were observed to include but not be limited to:

- Dust suppression achieved through extensive use of water carts based onsite, REMM AQ1;
- Street sweeping of internal sealed roads and exit to Ferrer Road;
- Permanent dust monitoring stations, REMM AQ4;
- Signage and bunting around tree and vegetation protection zones, REMM LV5;
- Concrete waste sumps, REMM SSW8 and Waste Segregation REMM WM3;
- Collected water treatment utilising permanent Onsite Detention Tank (OSD) shell as storage, REMM SSW4;
- Permanent on-site meteorological station, REMM AW4;
- On-site parking for construction personnel, REMM TTP5;
- Non-tonal reverse quackers used on movable plant and equipment;
- After months of above-average rainfall, weeds were evident on some batters and non-active areas though (**Observation**) but on subsequent site visits over the audit assessment period were observed to be progressively slashed. This included the obscured SSI signage (photograph in Appendix G) near the main site entrance which was pointed out to the contractor at the time.

No major or systemic issues were identified other than minor improvements and suggestions raised by the ER and covered in that report for weekly follow-up.

Further to the above, photographic evidence of observations are found in Appendix G further, and where applicable, added to compliance notes in the Appended Audit Findings tables.

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
NC1.	A30	SUBMISSIONS & APPROVALS: Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Non-compliant: 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 & 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.
NC2.	A32	SUBMISSIONS & APPROVALS: 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.	Non-compliant: <u>This</u> 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.

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation
NC3.	A35	<p>NON-COMPLIANCE NOTIFICATION: 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.</p>	<p>Non-compliant: Non-compliances identified during the Independent Audit Process were not communicated to the Planning Secretary in a timely manner.</p>	<p>Ensure that project stakeholders are aware of non-compliance notification obligations (as is the case for incidents).</p>
NC4.	B6 (e)	<p>INFORMATION: 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>Non-compliant: The Condition E27-required Construction Noise & 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"> • Trigger the need for document updates, and • Report on upload dates and compliance with B6 in its entirety.
NC5.	C7	<p>FAUNA & FLORA: 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>Non-compliant: Construction Flora & 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. <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 & Science Group Agency had made related submissions and recommendations, these reflected in the above-mentioned Management Plan.</i></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>Target timeframe: July 2021</p> <p>(Given habitat tree removal some months prior without any action).</p>

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation
NC6.	E15.	<p>FLOODING ISSUE: Detailed design of the SSI to maintain or improve flood characteristics i.e.</p> <ul style="list-style-type: none"> (a) maximum increase in inundation levels upstream of the SSI of 50 mm in a 1% AEP rainfall event; b) no increase in flood inundation levels in the Warragamba Pipelines corridor; c) a maximum increase in inundation time of one hour in a 1% AEP rainfall event. 	<p>Non-compliant: No detailed project design could be provided to evidence relevant flood mitigation measures and confirm that required flood 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>
	As above	E15, as above	<p>Further to above As context, the SIS Amendment Report noted the revised stormwater and drainage design:</p> <ul style="list-style-type: none"> • Would prevent floodwaters from overtopping Ferrers Road in the area between Carpark C and D during a 1% AEP event. • Reduces the diameter of the inlet pipe which directs water through the culvert underneath Ferrers Road between Carpark C and D <p>Also, 7.1.3 Potential amended flooding & hydrology impacts.</p> <ul style="list-style-type: none"> • 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. • Potential impact during the 1% AEP critical median storm, compared to existing conditions includes: <ul style="list-style-type: none"> ○ Minor increase on flood extent upstream of the culvert. ○ Increase in flood depths by up to 1.1 metres, and a potential minor increase in the duration of inundation by about 12 minutes compared to existing conditions critical median storm event (25-minute duration) 	

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation
NC7.	E35	<p>SOILS ISSUE: 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>Non-compliant: No definitive engineering design was available to specify and provide assurance that the permanent stockpile would be stable and not erode, causing soil or silt to impede existing drainage paths or enter the Warragamba pipeline corridor. This, at any stage, including treatment 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"> • Specific compaction details • Minimal material composition • 3-D profile and footprint to scale • Definitive maximum batter slope, height and volume • Drainage arrangements • Landscaping and vegetation treatment plus ERSED and maintenance arrangements for the establishment phase.
	As above	A35, as above	<p>Further to above. <i>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 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.</i></p>	
NC8.	E50	<p>WATER ISSUE: 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>Non-compliant: In addition to consent condition E35-related Audit Findings regarding permanent stockpile design, there was no <u>construction</u> plan including surface water 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"> • Contractor Inspection & Test Plans (or equivalent) for the construction process to provide quality assurance and technical compliance records.

ID	Consent Condition	Compliance Requirement (abbreviated)	Independent Audit Finding	Independent Audit Recommendation
NC9.	REMM TTP4	ROAD NETWORK PERFORMANCE Construction site traffic to be managed to minimise movements along Ferrers Road and the surrounding road network during peak periods.	Non-compliant: 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 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. <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>	Develop and implement a scheduling protocol to manage Spoil Haulage Truck movement frequency during peak periods. 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.

5.2 Improvement Opportunities & Observations

ID	Reference	Compliance Requirement (abbreviated)	Independent Audit Observation	Improvement Opportunity
IO1.	CoA E12 CoA C4 CoA C7	<p>Native vegetation clearing 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 & Fauna Sub Plan also requires implementation to confirm the abovementioned.</p>	<p>Observation / Improvement: 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>Improvement Required: 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>
IO2.	CoA C1	<p>Environmental Audits 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>Observation / Improvement: Environmental Audits required by CEMP s5.4 had not been conducted by the Contractor, neither was a Project Audit Schedule developed.</p>	<p>Improvement Required: Implement.</p>
IO3.	CoA C9	<p>Monitoring Plan Construction Monitoring Programs must provide:</p> <ul style="list-style-type: none"> a) details of baseline data available; b) details of baseline data to be obtained and when. 	<p>Observation / Improvement: The Monitoring Plan component of the Construction Soil & Surface Water Management Sub Plan did not clearly detail how a representative <u>baseline</u> would be established beyond the single site selection and a single water quality sample undertaken just prior to construction commencement.</p>	<p>Improvement Required: Address and implement.</p>

ID	Reference	Compliance Requirement (abbreviated)	Independent Audit Observation	Improvement Opportunity
IO4.	CoA C9 (g) CoA A1 EIS	AQ Monitoring Plan Reporting The Proponent must carry out the SSI (generally) in accordance with the Sydney International Speedway Environmental Impact Statement.	Observation / Improvement: 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.	Improvement Required: 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.
IO5.	CoA E51	Water issue: 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 least the condition it was in pre-construction.	Observation / Improvement: 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.	Improvement Required: Confirm that accountability obligations for identified WaterNSW infrastructure damage have been contractually formalised with the Contractor, including a liabilities period.
IO6.	REMM SSW5	Onsite surface water monitoring 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.	Observation / Improvement: The Construction Soil & 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.	Improvement Required: Implement and collect records from identified off-site locations during rainfall events.

ID	Reference	Compliance Requirement (abbreviated)	Independent Audit Observation	Improvement Opportunity
IO7.	N/A	Compliance records <i>No specific consent requirement - audit observation related to compliance assurance facilitation and business efficiency.</i>	Observation: 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.	Improvement Required: Implement Speedway Compliance Monitoring & Reporting Program requirements for "Evidence Based Record Keeping".
Obs1.	A1, A2, A3	Consistency Assessments <i>The project to be carried out and be consistent with the terms of the planning approval.</i>	Observation: 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 as intended during construction and beyond, for example: <ul style="list-style-type: none"> • "Vegetation clearance alongside Ferrers road of between 5 – 10 metres wide would have no visual impacts, being consistent with amenity observed from Viewpoint 4". • "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". 	Consider: Collect compliance evidence to demonstrate that impacts were as actually consistent as predicted.
Obs2.	CoA A22 (i)	ER Monthly Reports <i>Environmental Representative Monthly Reports to include information set out in the DPIE Environmental Representative Protocol.</i>	Observation: 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 & Approvals meetings.</i>	No further action required

ID	Reference	Compliance Requirement (abbreviated)	Independent Audit Observation	Improvement Opportunity
Obs3.	REMM GHG 1 EIS Chapter 5 PAR	<p>Greenhouse gas impacts 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 tCO₂e over the life of the project and a GHG reduction of about 63% over 50 years.</p> <p>Further to the above, the SIS Amendment Report required that further efficiency be considered during detailed design, this being a REMM obligations.</p>	<p>Observation: 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.</p>	<p>Consider: 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.</p> <p>This to be reviewed at the next Independent Environmental Audit.</p>

APPENDIX A: Audit Findings (Administrative Conditions)

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
A1	<p>The Proponent must carry out the SSI in accordance with the terms of this approval and generally in accordance with the:</p> <p>a) Sydney International Speedway- Environmental Impact Statement Volume 1 & 2 (the EIS) (dated August 2020)</p> <p>b) Sydney International Speedway - Submissions Report (the Submissions Report, dated November 2020); and</p> <p>c) Sydney International Speedway-Amendment Report (the AR, dated November 2020).</p>	<ul style="list-style-type: none"> Evidence as collected generally throughout this report, plus: <p><u>Consistency Assessments:</u></p> <ul style="list-style-type: none"> SIS 01 Retaining Wall Drainage, approved 20/01/21. SIS 02 Drainage Design Footprint, approved 25/02/21. SIS 03 Spoil Reuse, approved 08/03/21. <p><u>Environmental Reviews:</u></p> <ul style="list-style-type: none"> SIS ER01 Stormwater Road Crossing, endorsed 08/03/21. > SIS ER01 Additional Construction Area, 23/03/21 	<p>Based on information evidenced including statements made by Sydney Metro in a number of Consistency Assessments, the Sydney International Speedway project was generally being conducted in accordance with documentation cited in Condition A1 (alongside). One of the CA's did however assess as consistent, but increase the project footprint, this also including additional native vegetation clearing.</p> <p>Observed Consistency Assessments were mostly reliant on identified status quo mitigation measures however, with no additional process to confirm (as is the case with specific consent conditions and/or REMMS) that impacts assessed as being "consistent" were indeed so either during construction, pre-operation or beyond.</p>	Compliant	Obs1
A2	<p>The SSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in in accordance with the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.</p>	<ul style="list-style-type: none"> Evidence as reflected throughout this report 	<p>Other than above, and non-compliances reported elsewhere in this report, no material differences detected with adherence to procedures, commitments, performance criteria and mitigation measures and documents listed in Condition A1 of this approval.</p>	Compliant	
A3	<p>In the event of an inconsistency between:</p> <p>a) the terms of this approval and any document listed in Condition A1 inclusive, the terms of this approval will prevail to the extent of the inconsistency; and</p> <p>b) any document listed in Condition A1 inclusive, the most recent document will prevail to the extent of the inconsistency.</p> <p>Note: For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.</p>		<p>No material inconsistencies noted.</p>	Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
A4	In the event that there are differing interpretations of the terms of this approval, including in relation to a condition of this approval, the Planning Secretary's interpretation is final.		No material information noted or provided to trigger this condition.	Not triggered	
A5	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to:	<ul style="list-style-type: none"> No correspondence, documentation or information provided or apparent 	Auditees indicated no formal directives from DPIE, with no information to the contrary observed during the Independent Audit.	Not triggered	
	a) the environmental performance of the SSI; b) any document or correspondence in relation to the SSI; c) any notification given to the Planning Secretary under the terms of this approval; d) any audit of the construction or operation of the SSI; e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval); f) the carrying out of any additional monitoring or mitigation measures; and g) in respect of ongoing monitoring and management obligations, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval.		Incorporated in the above.	As above	
A6	Where the terms of this approval require a document or monitoring program to be prepared or a review to be undertaken in consultation with identified parties, evidence of the consultation undertaken must be submitted to the Planning Secretary with the document. The evidence must include:	<ul style="list-style-type: none"> Refer Appendix C 	Evidenced through Condition C3 consultation requirements, given that C9 Monitoring Programs were incorporated in associated Sub Plans.	Compliant	
	a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval; b) a log of the dates of engagement or attempted engagement with the identified party and a summary of the issues raised by them;			As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	<p>c) documentation of the follow-up with the identified party(s) where feedback has not been provided to confirm that they have none or have failed to provide feedback after repeated requests;</p> <p>d) outline of the issues raised by the identified party and how they have been addressed; and</p> <p>e) a description of the outstanding issues raised by the identified party and the reasons why they have not been addressed.</p>				
A7	This approval lapses five (5) years after the date on which it is granted unless work has physically commenced on or before that date.		Project was underway in accordance with Notification of Commencement Condition A27 further.	Not triggered	
A8	References in the terms of this approval 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 approval.		No situations noted or provided to trigger this requirement	Not triggered	
A9	Any document that must be submitted within a timeframe specified in or under the terms of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This condition does not apply to the immediate written notification required in respect of an incident under Condition A34 .		No agreed deviations to submission timeframes noted - refer to Condition A32 further though.	Not triggered	
A10-A14	Staging (staged construction and operation) <i>Non triggered consent Infrastructure Approval requirements are not articulated here (this report) for brevity purposes.</i>	<ul style="list-style-type: none"> No documentation or discrete construction staging evidenced. 	Construction was not planned in discrete stages, with sequential work phases being undertaken in accordance with the relatively short timeline.	Not triggered	
A15-A17	Ancillary Facilities. <i>Non-triggered consent Infrastructure Approval requirements are not articulated here (this report) for brevity purposes.</i>	<ul style="list-style-type: none"> No additional facilities or related evidence sighted and/or observed 	Only one construction compound and site office observed, required under the SSI terms of Condition A1. Auditees indicated this would be this case for the duration of the project.	Not triggered	
A18	Boundary screening must be erected around the construction boundary and all ancillary facilities that are adjacent to sensitive receivers for the duration of construction of the SSI unless otherwise agreed with relevant Council, and affected residents, business operators or landowners.	<ul style="list-style-type: none"> Refer to Appendix G photograph 	Boundary screening was sighted during the site inspection and subsequent audit visits, these at open, visible and/or exits / gateways	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
A19	Work must not commence until an Environmental Representative (ER) has been approved by the Planning Secretary and engaged by the Proponent.	<ul style="list-style-type: none"> DPIE (undated) letter 	Planning Secretary had endorsed an ER from HBI, the individual named in section 3.5 of <u>this</u> report. Quoted submission date of 24 December 2020 by DPIE confirmed this was before construction commenced (as opposed to low impact works), the latter date evidenced in Condition A27 further.	Compliant	
A20	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in Condition A1 and is independent from the design and construction personnel for the SSI and those involved in the delivery of it.	<ul style="list-style-type: none"> JR's Curriculum Vitae 	In addition to JR's CV, abovementioned letter indicates DPIE assessment of skills, experience and qualifications, as well as confirmation by JR that she did not assist in writing the EIS or Response to Submissions and was independent of personnel involved in the delivery of the project.	Compliant	
A21	<p>The Proponent may engage more than one ER for the SSI, 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 SSI.</p> <p>The ER must meet the requirements of the Environmental Representative Protocol (Department of Planning and Environment, October 2018).</p> <p>The appointment of the ER must have regard to the Department's guideline Seeking approval from the Department for the appointment of independent experts (OPIE, 2020).</p>	<ul style="list-style-type: none"> DPIE letter dated 23 March 2021 Lead Auditor Environmental, SAI Global dated 2007 Quarterly DPIE~ER Forum, dated 31/3/2021 	<p>Planning Secretary endorsed alternative ER being Brett M. (Name withheld from <u>this</u> report for privacy reasons)</p> <p>ER Protocol requirements were being met including:</p> <ul style="list-style-type: none"> Auditing experience and training Seeking feedback from the Department regarding ER responsibilities and performance Inspections (refer A22 below) 	Compliant	
A22	For the duration of the work until the commencement of operation, or as agreed with the Planning Secretary, the approved ER must:	<ul style="list-style-type: none"> Refer to evidence below 	ER activities were assessed as undertaken as below	Compliant	
	a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the SSI;	<ul style="list-style-type: none"> Email communication trail with DPIE from 12/1 to 19/3/21 regarding "construction commencement" et al 	Various emails demonstrated communications	As above	
	b) consider and inform the Planning Secretary on matters specified in the terms of this approval;	<ul style="list-style-type: none"> Telecon log of 19/3/2021 	Various communications including targeted telecons around approvals compliance management etc.	As above	
	c) consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community;	<ul style="list-style-type: none"> Environment & Approvals meetings of 11/2 and 25/3/2021 	Sighted ER recommendations when appropriate, documented in Sydney Metro Environment & Approvals meeting minutes	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	d) approve documents and any updates to documents identified in Conditions A10, C1, C3 and C8 and any other documents that are identified by the Planning Secretary, after verifying all relevant matters set out in this approval pertaining to those documents have been met, and make a written statement to the Planning Secretary to this effect;	<ul style="list-style-type: none"> ER email to DPIE re document approvals (below) sent @ 17:05 on 12/01/2021. <p><u>Letters</u> as follows, all dated 12/01/21:</p> <ul style="list-style-type: none"> HBI Cover letter to Planning Secretary HBI Condition specific Approval Letters <ul style="list-style-type: none"> ER email notification to DPIE re (above) ER approvals sent 17:05 on 12/01/2021. ER (HBI) Document Review Compliance Tracking spreadsheet CSWMP dated 12/01/21 	<p>Approval Letters relating to the following Management Plans and related Planning Conditions:</p> <ul style="list-style-type: none"> CEMP - in accordance with Condition C1, C2 and C7. CTMP accordance with Condition C3(a) CFFMP accordance with Condition C3(CAQMP in accordance with Condition C3(d) and C8(a) CSWP in accordance with Condition C3(e) and C8(b) <p>Sighted use of document review comments been tracked to ensure compliance with planning approvals.</p>	As above	
	e) regularly monitor the implementation of the documents listed in Conditions A10, C1, C3 and C8 to ensure implementation is being carried out in accordance with the document and the terms of this approval;	<ul style="list-style-type: none"> Weekly ER inspections including 20/01, 04/02, 31/03, 07/04, 15/04 & 22/04/2021. Monthly ER Reports, below 	Routine weekly inspections covered mitigation measures required by sub plans including soil and water, flora and fauna and air quality (dust), and related monitoring such as discharge water quality. It was noted that CEMP and Traffic-related requirements were not always covered.	As above	
	f) as may be requested by the Secretary, help plan, attend or undertake audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under Condition A29 of this approval; g) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints received directly by the Department; h) consider the impacts of minor ancillary facilities comprising lunch sheds, office sheds and portable toilet facilities as required by Condition A17 of this approval; and		Not applicable and/or triggered at the time	As above	
	i) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports."	<ul style="list-style-type: none"> Monthly ER Reports for January, February and April 2021 	<p>Generally followed the ER Protocol including reporting on:</p> <ul style="list-style-type: none"> Upcoming activities and construction works. ER activities during the period Site inspections undertaken Approved documents <p>A summary of community consultation undertaken / complaints received was not being reported however.</p>	As above	Obs2

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	(i) continued - The Environmental Representative Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the SSI, or as otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> • Reports as above • HBI>DPIE>HBI email dated 06/01/21 	<p>ER reports were submitted within the 7-day period required e.g. 3 May 2021, 5 May 2021.</p> <p>Requests sighted around postponement of December 2020 report, given ER approval being granted on 24/12.</p>	As above	
A23	<p>The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in Condition A22 (including preparation of the ER monthly report), as well as:</p> <p>(a) the complaints register (to be provided on a weekly basis or as requested); and</p> <p>(b) a copy of any assessment carried out by the Proponent of whether proposed work is consistent with the approval (which must be provided to the ER before the commencement of the subject work).</p>	<ul style="list-style-type: none"> • Consultation Manager database • HBI>Sydney Metro email dated 06/04/21 	<p>The ER indicated that Sydney Metro was providing all information necessary, with no information to the contrary observed during this audit.</p> <p>a) There had been no complaints for the preceding period.</p> <p>b) Email communications around Consistency Assessments indicated ER involvement before commencement of work/activities.</p>	Compliant	
A24	<p>The Planning Secretary may at any time commission an audit of an ER's exercise of its functions under Condition A22. The Proponent must:</p> <p>a) facilitate and assist the Planning Secretary in any such audit; and</p> <p>b) make it a term of their engagement of an ER that the ER facilitate and assist the Planning Secretary in any such audit.</p>		Auditees indicated no formal directives from DPIE, with no information to the contrary detected during this Independent Audit.	Not triggered	
A25	Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Post Approval Requirements (2020).		There were no Sydney Metro Compliance Reporting obligations to date. Quarterly and other reporting obligations would trigger post this audit report.	Not triggered	
A26	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.		Operational phase - not applicable to construction.	Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
A27	The Department must be notified in writing of the dates of commencement of construction and operation at least two (2) weeks before those dates.	<ul style="list-style-type: none"> SM > DPIE email entitled "construction commencement" dated 14/12/20. Construction Program (Speedway Project) by Abergeldie dated 13/01/21 	Based on Auditee responses, objective evidence (alongside) and other records sighted during this audit, construction did not commence before 12 January 2021 - refer also to Conditions A22 e) and A27	Compliant	
A28	If the construction or operation of the SSI to be staged, the Department must be notified in writing at least one month before the commencement of each stage, of the date of the commencement of that stage.	<ul style="list-style-type: none"> Construction Program (Speedway Project) by Abergeldie dated 13/01/21 	Whilst the Construction Program and some Management Plans such as the CTMP reflected project "stages", these were contiguous, with no discrete packages stating and/or finishing.	Compliant	
A29	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	<ul style="list-style-type: none"> <u>This</u> Audit Report 	The Independent Audit PAR document dated May 2020 was adhered to in planning, conduct and reporting of <u>this</u> audit. Condition deemed complaint, unless otherwise advised by DPIE.	Compliant	
A30	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	<ul style="list-style-type: none"> DPIE Approval dated 9/4/2021. (Annexure A) 	<p>This Independent Audit was obligated to commence whilst Sydney Metro were still awaiting formal Planning Secretary endorsement of the nominated independent auditor, reasons being:</p> <ul style="list-style-type: none"> A site inspection (triggering audit start date) needed to be undertaken and be representative given partial site shutdown and reduction of potentially impactful works due to Easter Long Weekend and related Motorsport Events. <u>This</u> audit had to commence within 12 weeks of construction commencement to comply with Condition A20 and PAR audit frequency requirements. 	Non-complaint	NC1
A31	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Compliance Reporting Post Approval Requirements (2020) upon giving at least four weeks' notice (or timing as stipulated by the Planning Secretary) to the Proponent of the date upon which the audit must be commenced.	<ul style="list-style-type: none"> 		Not triggered	
A32	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 Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> Refer to start date (inspection date) and audit completion (report date) on front page of <u>this</u> Report 	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.	Non-complaint	NC2

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
A33	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.		Operational phase - not applicable to construction.	Not triggered	
A34	The Planning Secretary must be notified in writing via the Major Projects Website immediately after the Proponent becomes aware of an incident. The notification must identify the SSI (including the application number and the name of the SSI 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 A			Not triggered	
A35	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.		No non-compliances were identified by Sydney Metro or the Construction Contractor for the audit period, however: Non-non-compliances were flagged by the Auditor during the audit process, formalised in a documented tables emailed on 20 May 2021, and further documented in a draft Independent Audit Report dated 31 May 2021 – this Audit report submitted to Sydney Metro in accordance with PAR s4.3.1 to enable to review and provision of any additional information prior to Audit Report finalisation.	Compliant	NC3
A36	A non-compliance notification must identify the SSI and the application number for it, set out the condition of approval 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. Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	•		Not Triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
A37	<p>The SSI name, application number, telephone number, postal address and email address required under Condition B3 of this approval must be available on site boundary fencing / hoarding at each ancillary facility subject to Conditions A15, A16 and A18 before the commencement of construction.</p> <p>This information must also be provided on the website required under Condition B6.</p>	<ul style="list-style-type: none"> Refer Condition B6 and Appendix G 	<p>No ancillary facilities - refer Conditions A15, A16 and A1 above.</p> <p>Noted as displayed on main project site boundaries though – refer Appendix G photograph.</p> <p>Information provided on the website – refer Condition B6 further.</p>	Not triggered	

APPENDIX B: Audit Findings (Community Information & Reporting)

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
B1	The Overarching Community Communications Strategy as provided in the documents listed Condition A1 must be implemented until the project is handed over to the Western Sydney Parklands Trust.	<ul style="list-style-type: none"> Abergeldie Community Communication Strategy dated 27/11/20. Sydney Metro OCCS rev 2.1 dated 28/10/2020 	The Construction Contractor had developed a specific "Communication Community Strategy" providing additional information to that covered in the Sydney Metro Overarching CCS of EIS volume 2. This was commendable given the development of an additional document was not directly a consent requirement with condition B1 only requiring implementation of the Sydney Metro Overarching CCS	Compliant	
As above		<p><u>Consultation Manager</u> database, including specific categories of records such as:</p> <ul style="list-style-type: none"> Community Notifications 22/1, 22/2 & 22/3 Precinct Control Group meeting minutes 4/12, 22/2 Air Quality Monitoring sub plan comments email of 3/2/21 CEMP consultation information CNVIS consultation with BCC Engagements data re-noise and noise treatments Noise Treatment door knock statistics Incoming emails and phone calls, January - March 2021 Stakeholder specific communications e.g. WSPT <p><u>Other CCS required records</u> including:</p> <ul style="list-style-type: none"> Abergeldie Monthly Reports Property Assessment letters, 1/02 17/02 and 3/03/2021 	The Construction Contractor CCS was evidenced as being implemented with a high degree of adherence, sighting specific, discrete and general consultation and engagement records (alongside).	As above	
B2	A Complaints Management System must be prepared and implemented before the commencement of any work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of the SSI.	<ul style="list-style-type: none"> Consultation Manager, as above 	Established Consultation Manager / CMS available to capture complaints when raised.	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
B3	<p>The following information must be available to facilitate community enquiries and manage complaints before the commencement of work and for 12 months following the completion of construction:</p> <ol style="list-style-type: none"> a 24- hour telephone number for the registration of complaints and enquiries about the SSI; a postal address to which written complaints and enquires may be sent; an email address to which electronic complaints and enquiries may be transmitted; and (d) a process for complaints unable to be resolved. <p>This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.</p>	<ul style="list-style-type: none"> Various records stated herein 	<p>Website, notifications, emails and signage sighted furnished contact information required by Condition B3 (alongside).</p>	Compliant	
B4	<p>A Complaints Register must be maintained recording information on all complaints received about the SSI during the carrying out of any work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the:</p> <ol style="list-style-type: none"> number of complaints received; number of people in the household affected in relation to a complaint; any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; and means by which the complaint was addressed and whether resolution was reached, with or without mediation. 	<ul style="list-style-type: none"> Consultation Manager, as above 	<p>Not applicable at this stage.</p> <p>Noted social media text message received 13/4/2021 been a COMPLIMENT from an Easter Long Weekend Raceway enthusiast who also commented on parking availability</p>	Not triggered	
B5	<p>The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request. Personal details of complainants must be provided where this is consistent with the Proponent's privacy statement, notice or policy.</p>		<p>There being no complaints, it did not appear that DPIE had requested information on complaints during the period.</p>	Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Note: Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties.				
B6	<p>A website or webpage providing information in relation to the SSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 12 months following the completion of all stages of construction.</p> <p>Up-to-date information (excluding confidential, private and/or commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the website or dedicated pages including:</p>	<p>Contractor website: https://abergeldie.com.au/projects/bridges-roads/sydney-international-speedway/</p> <p>Sydney Metro websites: https://www.sydneymetro.info/station/sydney-international-speedway and https://www.sydneymetro.info/west/environment-planning</p>	Websites (alongside) were established and maintained; with information (mostly) published before relevant work commencing, as evidenced further below.	Non-compliant	Refer below
As above	a) information on the current implementation status of the SSI;	<p>Construction Updates (Notifications)</p> <ul style="list-style-type: none"> • 30/11/2020, 14/12/2020 and • 22/11, 22/02, 22/03 & 22/04 of 2021 		As above	
As above	b) a copy of the documents listed in Condition A1 and Condition A2 of this approval, and any documentation relating to any modifications made to the SSI or the terms of this approval;	<ul style="list-style-type: none"> • Sydney Metro website 	No Condition A1 document copy per se, however the Construction section indicates the Planning Approval and provides link to relevant section of DPIE Major Projects portal webpage. The Speedway Virtual Information Room also provides links to Condition A1 documentation.	As above	
As above	c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval, or links to the referenced documents where available;	<ul style="list-style-type: none"> • 	As above		
As above	d) a copy of each statutory approval, licence or permit required and obtained in relation to the SSI, or where the issuing agency maintains a website of approvals, licences or permits, a link to that website;	<ul style="list-style-type: none"> • 	As above, but no known licences, with no Environment Protection Licence required as not a scheduled activity	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
As above	e) a current copy of each document required under the terms of this approval, which must be published within one week of its approval or before the commencement of any work to which they relate or before their implementation, as the case may be; and	Contractor website metadata, with screenshots maintained on Independent Auditor file: <ul style="list-style-type: none"> • CCS upload of 20/12/2020 • CEMP, CSWMP, CAQMP & FFMP uploads of 12/01/2021. • CTMP uploads of 11/01/2021 	Planning Approval required Communication Strategy, the Construction Environmental Management Plan and all 4 related sub-Plans (noted in section 4.5 of the body of <u>this</u> report) were uploaded / published within one week of their approval or before work commenced. The Community Communication Strategy dated 10/5/2021 revision 2 was noted as published on the website prior to completion of <u>this</u> audit report.	As above	
B6 (e)	Continued, as above	<ul style="list-style-type: none"> • Contractor website, prior to publishing draft report (documents as above) 	<p>Condition E27 required Construction Noise & Vibration Impact Statement dated December 2020 had not been published on the Sydney International Speedway project website before commencement of work.</p> <p>The Construction Contractor uploaded the above-mentioned document prior to completion of <u>this</u> audit report - however there was no process to identify such non-compliances (especially given the length of time), also noting that Planning Approval required compliance and/or monitoring reports, whilst not triggered at the time of <u>this</u> audit required imminent publishing.</p>	Non-compliant	NC3
	f) a copy of the compliance and audit reports required under Condition A25, and Conditions A29 and A31 of this approval.	<ul style="list-style-type: none"> • 	Essentially, not triggered but there were other Planning-Approval-required Compliance Reports plus an Air Quality Monitoring Report requiring imminent publishing post-audit.	As above	

APPENDIX C: Audit Findings (Construction Environmental Management)

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
C1	A Construction Environmental Management Plan (CEMP) must be prepared in accordance with the Construction Environmental Management Framework (CEMF) included in the documents listed in Condition A1 to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during construction.	<ul style="list-style-type: none"> CEMP dated 11/01/2021. Environment Inspection Folders, weekly from 17/02/21 to 01/04/21 Environment Inspection (checklist) reports dated 10/02/21 and 12/02/21 et al. Environment Control Maps, Carparks: 1A rev6, 1C rev5, D1 rev0, D2 rev3, all dated 19/3/21 and Stockpile Area rev4 dated 12/02/21. Project Induction Register (424 entries at the time) Induction questionnaire and Site Induction PowerPoint rev 01 	<p>Alignment with CEMF addressed through Compliance Matrix, Annexure A, incorporated to the extent applicable in the CEMP or subplans. Similarly, CEMF tables in sub plans - refer Condition C4 further - evidenced compliance.</p> <p><u>Implementation</u> - in general, key components of the CEMP not otherwise covered in Sub Plans below were mostly evidenced as implemented. It was observed that:</p> <ul style="list-style-type: none"> No Non-Conformance/Non-Compliance Reports (NCRs) had been raised per s5.3.4 given no reported issues or systemic problems. There was no Audit Schedule as yet for Internal Environmental Audits as required by s5.4 nor were there any Environmental Audit Reports 	Compliant	IO-2
C2	The CEMP must be prepared and submitted to the ER for approval no later than one (1) month before the commencement of construction, unless otherwise agreed by the ER. Where construction is staged, submission must be no later than one (1) month before the commencement of that stage, unless otherwise agreed by the ER	<ul style="list-style-type: none"> ER email dated 10/12/2020 to Proponent and Contractor 	<p>Given construction reportedly as commencing 12/01/2021 - ER correspondence indicated her requirement for review and approval prior to construction commencing, stating "final versions to be provided no less than 5 days prior".</p> <p>No staged construction, as described earlier in this report.</p>	Compliant	
C3	The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan:	<ul style="list-style-type: none"> Evidence in attachment to Sub plans below: 	<ul style="list-style-type: none"> Workshops held 14/10/2020 with various agencies and precinct stakeholders around dust. Sub plans below evidenced consultation with specified stakeholders and agencies as attachments and response tables within the document. 	Compliant	
	(a) Traffic & Transport - Relevant Road Authorities, WSPT	<ul style="list-style-type: none"> CTMP rev D dated 05/01/21 	Annexure H Stakeholder Correspondence reflected feedback from Blacktown City Council, TfNSW and WSPT, plus return replies by Sydney Metro.		
	(b) Flora & Fauna - EESG, WSPT, and Council	<ul style="list-style-type: none"> CFFMP dated 12/01/21 	Annexure B Stakeholder Consultation Feedback Tables reflected when documents were sent for review, date comments received from WaterNSW, EESG and Blacktown City Council and how these had been addressed in the Sub-plan.		

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	(d) Air Quality (including dust) - WSPT, WaterNSW, and Council	<ul style="list-style-type: none"> CAWMP dated 12/01/21 	s2.0 Annexure B Stakeholder Consultation Feedback tables reflected when documents were sent for review, date comments received from WaterNSW, WSPT and Blacktown City Council and how these had been addressed in the Sub-plan. S2.1 reflected email correspondence.		
	(e) Soil & Surface Water - EESG, WSPT, Sydney Water, WaterNSW and Council	<ul style="list-style-type: none"> CSWMP dated 12/01/21 	Annexure E Consultation Records tables reflected when documents were sent for review, date comments received from WaterNSW, WSPT and Blacktown City Council and how these had been addressed in the Sub-plan.		
C4	The CEMP Sub-plans must be prepared in accordance with the CEMF.	<ul style="list-style-type: none"> Sub plans, above 	Alignment with CEMF addressed through Compliance Matrices, or CEMF tables in sub plans, typically in s4.4 of the following for example. <ul style="list-style-type: none"> Flora & Fauna Sub Plan Soil & Surface Water Management Sub Plan 	Compliant	
C5	Details of all issues raised by an agency relevant to development of a CEMP Sub-plan as a result of consultation, including copies of all correspondence from those agencies, must be provided with the relevant CEMP Sub-Plan.	<ul style="list-style-type: none"> Sub plans, above 	Correspondence attached to the various sub plans, did not appear to identify any issues by relevant the agencies: CTMP - no issues noted by BCC et al. CFFMP - no obvious issues are raised by stakeholders identified in C3 above, only extensive guidance by EESG. CAWMP- no obvious issues but concerns by WaterNSW noted as covered in the Sub plan or the Planning Approval. BCC, like WaterNSW, expressed concerns about dust trigger levels. CSWMP - no obvious issues, but concerns by WaterNSW noted as covered as above'	Compliant	
C6	Any of the CEMP Sub-plans may be submitted to the ER along with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction, unless as otherwise agreed by the ER.		Refer to ER Conditions above	Compliant	
C7	Commencement subject to approval Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the ER.	<ul style="list-style-type: none"> Refer Condition A22 (e) Refer Condition A27 SM > DPIE email entitled "construction commencement" dated 14/12/20 	<ul style="list-style-type: none"> ER approved CEMP and Sub-plans on 12/01/2021. Based on Auditee responses, objective evidence (alongside) and other records sighted during this audit, construction did not commence before 12 January 2021 	Refer below	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
C7 Cont'd	<p>Plan implementation The 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>Flora & Fauna Plan implementation</p> <ul style="list-style-type: none"> Narla Environmental Pre-Clearing Reports dated 13/11/12 (enabling works), 7/12/20, 22/12/20 and 4/2/2021. Contractor emails to Ecologist around 8/12/20 re Weed Removal. Grasshopper Environmental EPL 21442 Bingo Genesis Recycling EPL 20121 Green Waste disposal dockets dated 11/12/20 and 15/12/20 respectively. ITP Clearing & Grubbing Checklist dated 13/01/21. Narla Environmental Post Clearing Report dated 12/02/21. Narla Environmental Weed Mapping Report dated March 2021 	<p>Flora & Fauna Plan implementation Key components of the F&F sub- plan were evidenced as being undertaken as advised by an ecologist, with day-to-day implementation managed and/or assessed through Contractor Environment Team and ER inspections</p> <p>Ecologist involvement also included advice on pre-clearing, plus weed removal, bagging and removal to a licensed green waste facility.</p> <ul style="list-style-type: none"> Compliant, however <u>this</u> Condition assumes a non-complaint status based on Audit Findings further 	Refer below	
C7 Cont'd		<p>Flora & Fauna Plan implementation</p> <ul style="list-style-type: none"> SIS 02 Drainage Design Footprint CA approved 25/02/21. Pacific Survey "Batter Chute Tree Clearings" aerial photograph image, status "for information only" undated, plotted Friday 9 PHOTO 8, Appendix G 	<p>Flora & Fauna Plan implementation Flora & Fauna Management Plan and/or CEMF clause 9.2 b (iii) obligations had not been consistently implemented i.e.</p> <ul style="list-style-type: none"> No Post Clearing ecologist surveys of clearing since 5 February, including but not limited to additional TEC clearing relating to batter chutes constructability as per a Consistency Assessment. Surveyor information plotted and provided after the audit interview showed boundary overlay on GIS aerial imagery of a pre-cleared status, with footprint appearing to be produced from a software application, not derived from a physical post clearance field survey. Given above, it was concluded that no project information was available including required update of Geographical Information System files to validate the type and area of vegetation cleared - refer to Improvement Opportunity raised against E12 further. <p>Note: Timely surveys would also demonstrate compliance with the number of required biodiversity offset credits</p>	Refer below	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
C7 Cont'd		<p>Flora & Fauna Plan implementation</p> <ul style="list-style-type: none"> No specific evidence available <ul style="list-style-type: none"> Narla Environmental Pre-Clearing Report dated 7/12/20, 	<p>Flora & Fauna Plan implementation</p> <p>Flora & Fauna Management Plan s7.1.3 stated that where required, durable nest boxes or artificial hollows would be installed one month prior to any vegetation clearing, in accordance with the recommendations from the qualified Ecologist.</p> <p>A nest box strategy had not been implemented nor was there any formal project record on this matter, noting:</p> <ul style="list-style-type: none"> Ecologist report of December 2020 identified at least 6 Habitat Trees would be cleared in the area surveyed, with 9 hollows of varying sizes. Stakeholder Blacktown City Council required that "hollows removed are to be replaced at a ratio of 3:1 for all hollows removed. Stakeholder Environment, Energy & Science Group Agency recommendation that compensatory tree hollows/nest boxes should be provided prior to removal of existing tree hollows FFMP Annexure B Stakeholder Consultation Feedback Tables reflected the abovementioned requirements were acknowledged and be addressed; 	Non-compliant	NC5
C7 Cont'd	<p>Staging subject to approval</p> <p>Where construction of the SSI is staged, construction of a stage must not commence until the CEMP and sub-plans for that stage have been approved by the ER.</p>		<p>Refer Condition A10</p> <p>Not triggered, but Condition assumes non-complaint status based on Audit Findings above</p>	Refer above	
C8	<p>The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies identified for each to compare actual performance of construction of the SSI against the performance predicted in the documents listed in Condition A1 or in the CEMP:</p> <ol style="list-style-type: none"> Dust – WSPT, WaterNSW, and Council to be consulted. Soil and Water - WSPT, Sydney Water, and Council to be consulted. 	<ul style="list-style-type: none"> Air Quality Management Sub Plan dated 12/01/21. Soil & Surface Water Management Sub Plan dated 12/01/21. 	<p>Construction Monitoring Programs were incorporated (and consultation evidence) in the above-mentioned subplans, as follows:</p> <ol style="list-style-type: none"> CAWMP (dust) – s7.2 Monitoring Requirements. CSWMP (Soil & Water) – s9.3 Monitoring & Inspections 	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
C9	Each Construction Monitoring Program must provide:	<ul style="list-style-type: none"> Sub plans, above 		Compliant	
C9 Cont'd	a) details of baseline data available; b) details of baseline data to be obtained and when;	<ul style="list-style-type: none"> CAWMP (dust), above 	Baseline data, s 7.2.1 reflected EIS Air Quality impact Assessment data, with Table 6 reflecting Adopted Background Air Quality Conditions for the project.	As above	
C9 Cont'd	C9 (b) baseline data, as above	<ul style="list-style-type: none"> CSWMP (Soil & Water), above 	s 5.2.2 discusses Blacktown City Council's "Waterway Health Report" 2018-2019 results and the difficulty in obtaining representative data. s 9.3.1 indicates adoption of physical analytes recommended by the contractors ERSED specialist (SEEC) and Table 6 depicted location and presentation of a small creek leading into Eastern Creek west of Pipeline Park, defining sampling as first week of the month or following a rain event, however: <ul style="list-style-type: none"> Whilst a single sampling exercise was undertaken following rain event on 7 January 2021 there were no further details on how a representative baseline would be established prior to potential construction impacts. 	As above	IO-3
C9 Cont'd	c) details of all monitoring of the project to be undertaken; d) the parameters of the project to be monitored; e) the frequency of monitoring to be undertaken; f) the location of monitoring;	<ul style="list-style-type: none"> Sub Plans, as above 	Both subplans generally cover requirements (alongside)	As above	
C9 Cont'd	g) the reporting of monitoring results;	<ul style="list-style-type: none"> Sub Plans, as above 	Reporting of Monitoring results were described in the above-mentioned subplans, as follows: <ul style="list-style-type: none"> CAWMP (dust) – s 8.4 Compliance & Reporting indicating an "Air Quality Monitoring report will be made publicly available on a quarterly basis on the project website". CSWMP (Soil & Water) – s 9.7 Reporting indicating quarterly reporting. However, <u>Air Quality Management Sub Plan</u> : <ul style="list-style-type: none"> Tables 6 and 7 Air Quality Indicator values differ to that predicted in the EIS tables 9.4 to 9.7.(section 4.6 of <u>this report</u>) Did not clearly address Speedway dust trigger level reporting requirements raised in WSPT submission and Speedway Delivery Agreement attached to the subplan. 	As above	IO-4

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
C9 Cont'd	<p>h) procedures to identify and implement additional mitigation measures where results of monitoring are unsatisfactory;</p> <p>i) any consultation to be undertaken in relation to the monitoring programs; and</p> <p>j) details of all information requested by an agency including copies of all correspondence from those agencies.</p>	<ul style="list-style-type: none"> • Sub Plans, as above 	Both subplans generally cover requirements (alongside)	As above	
C10	The Construction Monitoring Programs must be submitted to the ER for approval at least one (1) month before the commencement of construction, unless otherwise agreed by the ER.	<ul style="list-style-type: none"> • As above 	Refer C8 and C2 above	Compliant	
C11	Construction must not commence until the ER has approved all of the required Construction Monitoring Programs, and all relevant baseline data for the specific construction activity has been collected, unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> • As above 	Refer C2 above	Compliant	
C12	<p>Monitoring Program implementation</p> <p>Construction Monitoring Programs, as approved by the ER must be implemented for the duration of construction and for any longer period set out in the monitoring program or specified by the Planning Secretary, whichever is the greater.</p>	<p>Dust Monitoring Program implementation</p> <ul style="list-style-type: none"> • Environment Inspection (checklist) reports as above. • Dust Level Reports of November & December 2020 and January & February 2021 • Eurofins DDG CoA dated 19/02/21. • "Site Hive" real-time dust monitoring system and Dashboard (section 47.36 of this report) • Site inspection observations, from this audit incl. photographs of Appendix G. • Site Plant and Equipment Register 	<p>Dust Monitoring Program implementation</p> <p>Specified monitoring requirements of s 7.2 were evidenced as undertaken by the Contractor Environment Team, including:</p> <ul style="list-style-type: none"> • Weekly site inspections Item 5 Air Quality assessing dust suppression practices, truckloads being covered and smoke emissions from plant/vehicles (also a REMM AQ2 requirement) • "Site Hive" real-time IT solution monitoring system used to monitor dust levels and trends and alert triggers. • Monthly Reports on PM data from monitoring stations / gauges (REMM AQ3) and comparison to EPA Prospect data • External laboratory analysis of dust deposition • Site Plant and Equipment Register - servicing data 	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
C12 Cont'd	Program implementation, as above	Water Monitoring Program implementation <ul style="list-style-type: none"> • Eurofins WQ CoA Report dd 07/01/21 & 15/03/21. • Eurofins WQ CoA Report 770245 (28/01), 780547 (15/03) & 782841 (25/03) • Eurofins Dewatering Analysis Report 782841 (25/03/2021) • Dewatering Inspection Checklist, report of 01/04/2021 	Water Monitoring Program implementation Specified monitoring requirements of s 9.3 were evidenced as undertaken by the Contractor Environment Team, including: <ul style="list-style-type: none"> • Off-site River Water Quality Laboratory Analysis reports • Contractor Dewatering Water Quality testing checklist / report, noting that off-site discharge was reportedly a rare occurrence given on-site storage and use. Abovementioned discharge water was treated with chemical prior to discharge as required by REMM SW4	As above	
C 13	<p>The results of Construction Monitoring Programs must be submitted to the Planning Secretary, and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program.</p> <p>Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.</p>		Construction Monitoring Program Reporting was stated in the following Sub-plans. <ul style="list-style-type: none"> • CAQMP - section 4.2 Table 1, Conditions of Approval indicates quarterly reporting to DPIE via Sydney Metro • CSWMP (above) section 9.7 Table 11, Reporting, indicates quarterly reporting, but does not mention submission to the Planning Secretary, 	Not triggered	

APPENDIX D: Operational Environmental Management

Placeholder - there were no operational consent conditions applicable and/or assessed at this time.

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APPENDIX E: Audit Findings (Key Issue Conditions)

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Traffic and Transport impacts				
E1	<p>All requests to Council for approval to use local roads, which are not identified for use in the documents listed in Condition A1, must include a traffic and pedestrian impact assessment, and a swept path analysis if requested.</p> <p>The findings of the traffic and pedestrian impact assessment must inform the Traffic and Transport CEMP Sub-plan (Condition C3), and:</p>	<ul style="list-style-type: none"> Construction Traffic Management Plan, Main Works, rev D dated 05/01/21. CTMP Audit dated 1/12/2020 by RSN Network Jacobs Traffic & Transport Memo dated 15/04/21 TTLG Meeting minutes dated 25/03/21 TCG Meeting minutes dated 18/03/21 ROs Email from Turnbull about swept paths. 	<p>A number of studies and assessments were undertaken as opposed to a “traffic and pedestrian impact assessment” these appear to inform the CTMP development, including that of Early Works CTMP, Main Works CTMP and Competitors Road CTMP.</p> <p>Section 12.6 Figure 17 of the Main Works CTMP provided evidence of a Swept Path Analysis for the Chandos / Ferrers Road roundabout.</p> <p>Section 16.1 of the Main Works CTMP addressed RSA findings, referencing inclusion in the CTMP.</p> <p>Consent condition specifics addressed in the Main Works CTMP include but were not limited to</p>	Compliant	
As above	<p>a) demonstrate that the use of local roads will not compromise the safety of the public and have no more than minimal amenity impacts;</p> <p>b) provide details as to the date of completion of the road dilapidation surveys for the subject local roads; and</p> <p>c) describe the measures that will be implemented to avoid where practicable, the use of local roads past schools, aged care facilities and childcare facilities during peak times for operation.</p>		<p>a) Main Works CTMP s12 indicated limited movements to a short section of public Ferrers Road. No impact on pedestrians were noted given that construction work would not take place during events. Non-use of Chandos Road in favour of The Horsley Drive for spoil movement to Pre-cast appeared to be partly influenced by residential safety.</p> <p>b) Addressed by s13.1</p> <p>c) s14.2 indicated no schools, aged care or childcare facilities and been identified within the project footprint of haulage routes:</p>	As above	
E2	<p>Before use of Ferrers Road or any local road by a heavy vehicle for construction of the SSI, a Road Dilapidation Report must be prepared for the relevant road. A copy of the Road Dilapidation Report must be provided to the relevant Council within three weeks of completion of the survey and at least two weeks before the road is used by heavy vehicles associated with the construction of the SSI.</p>	<ul style="list-style-type: none"> Ferrers Road Condition Survey of 27/10/20 by AusDilaps Dragway Carpark to Gate D Condition Survey of 27/10/20 Metro>BCC “Dilapidation Reports” email dated 10/11/2020. Chandos Road Condition Survey of 15/03/2021 AusDilaps 	<p>Sydney Metro had provided the dilapidation reports (completed by the construction contractor) within 2 weeks of completion and some time before use / construction commencement.</p> <p>Use of Chandos Road was decided against, and the construction contractor was intending to propose to council that no additional dilapidation survey would be completed for spoil going to Precast yard, given heavily trafficable main roads such as Horsley Drive being used.</p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E3	Road damage. <i>Requirements for rectification and/or compensation within 3 months after the completion of construction had not been articulated in <u>this</u> report for brevity purposes.</i>			Not triggered	
E4	During construction, all reasonably practicable measures must be implemented to maintain pedestrian and vehicular access to, and parking in the vicinity of, businesses and affected properties within the Eastern Creek Motor Sports Precinct 5 as identified in the Western Sydney Parklands Plan of Management 2030. Disruptions must be avoided, and where avoidance is not possible, minimised. Where disruption cannot be minimised, alternative pedestrian and vehicular access, and parking arrangements must be developed in consultation with affected businesses and implemented before the disruption. Adequate signage and directions to businesses must be provided before, and for the duration of, any disruption.		Refer to Community Information Condition B1, there was limited impact potential for identified businesses and non-existent pedestrians. Construction worker parking was provided onsite (REMM TTP5) and offset parking for Dragway events during construction was also provided.	Compliant	
E5	The SSI (including new or modified local roads, parking, pedestrian and cycle infrastructure) must be designed to meet relevant design, engineering and safety guidelines, including the Austroads Guide to Traffic Management.	<ul style="list-style-type: none"> Design Memo Ferrers Rd (Competitor exit) Intersection dated 25/5/20 by Turnbull Engineering 	Relevant guidelines such as AS1742.3, Austroads GRD and RMS supplements was claimed by Turnbull Engineering as being considered in the design of Southern Competitor exit into Ferrers Road.	Compliant	
E6	An independent Road Safety Audit of detailed design plans of new or modified local road, parking, pedestrian and cycle infrastructure provided as part of the SSI must be undertaken by an appropriately qualified and experienced person before construction to ensure that they meet the requirements of relevant design, engineering and safety guidelines, including Austroads Guide to Traffic Management. Audit findings and recommendations must be actioned before construction of the relevant infrastructure and must be made available to the Planning Secretary on request.	<ul style="list-style-type: none"> Turnbull Detailed Design Stage 3 RSA Audit Report rev B dated 13/08/20 	Turnbull Engineering RS audit of 6/7/2020 utilised two Level 3 Road Safety Auditors RSA-0200165 and 0200469). Section 2.2 Scope of the Report indicated 100% Detailed Design submission of the project works. Section 2.3 RSA Referenced Materials cited Austroads Guides to Road Safety and Road Design plus AS1742.1 Manual for uniform traffic control devices. The Austroads Guide to Traffic Management was not mentioned per se. Designer Response of August 2020 was incorporated into Table 4.1 of the Audit Findings section of the report, reflecting coverage and/or incorporation into the design and IFC drawings.	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Event Management				
E7	Scheduling of events (both minor, major and concurrent) must be managed to reduce noise, traffic and dust impacts.			Not triggered	
E8	No concurrent events at the Sydney International Speedway and the Western Sydney International Dragway are permitted to occur until a Major Events Operations Plan (as identified in the documents listed in Condition A1) has been prepared to address traffic management, parking, noise and dust management. The plan must be implemented for all concurrent events.			Not triggered	
	Air Quality impacts				
E9	In addition to the commitments to develop performance outcomes and mitigation measures for air quality specified in the documents listed in Condition A1, all reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during the construction and operation of the SSI.	<ul style="list-style-type: none"> Varied evidence already cited in other Appendices to <u>this</u> report 	Additional construction related measures included extensive use of dust suppression polymer on exposed and/or trafficable areas, sighted during the site inspection and reflected in weekly ER inspection reports	Compliant	
E10	The commitments to develop performance outcomes and mitigation measures for air quality specified in the documents listed in Condition A1 must be implemented during construction and operation of the SSI to ensure the operational safety of the Western Sydney International Dragway.	<ul style="list-style-type: none"> CAQMP implementation records previously cited. 	Construction Contractor was engaging with Dragway Operator pre-events with partial site shut down being a focused mitigation measures for the Easter long weekend event	Compliant	
E11	Operational air quality mitigation measures as identified in the documents listed in Condition A1 that will not be physically affected by work, must be established as soon as practicable during construction.	<ul style="list-style-type: none"> Dust Shield Fence Structure specification and design by Central Industries, dated 26/3/2021. SIS Operational AQ Management Plan by Ramboll, dated 24/2/21 Sydney Speedway Dust Screen Design Review by Ramboll, dated 23/12/20 	Sydney Metro had completed a Dust Screen design (as part of air quality management) and construction was about to commence. A Speedway Deed Delivery of Agreement was established between WSPT and Sydney Metro to nominate the future Speedway Operator's obligations to implement air quality management i.e. dust monitoring, management plan and mitigation measures in the operational phase. The Speedway design includes a stormwater detention tank (drawings referenced elsewhere in <u>this</u> report) with a pump to allow the Speedway operator to continually water the track and mitigate the risk of dust generation.	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Biodiversity impacts				
E12	The clearing of native vegetation must be minimised with the objective of reducing impacts to threatened ecological communities and threatened species habitat.	<ul style="list-style-type: none"> • Carpark C photograph date stamped 2/3/2021 • Ecologist Post-Clearing Survey (previously referenced) • Consistency Assessment (previously referenced) 	<p>Whilst efforts had been undertaken to minimise clearing e.g. specific drainage work for carparks (evidencing work-around for specific tress), construction safety concerns around batter chutes had resulted in more EEC clearing than predicted - refer section 4.6 in the body of this report. Noted that although possible attempts at minimisation might have been undertaken, a Consistency Assessment deemed this to be generally in accordance with consent conditions.</p> <p>Flora and Fauna Management Plan and/or CEMF clause 9.2 b (iii) obligations to produce post clearing surveys and validate the type and area of vegetation cleared had not been undertaken some months later – this Improvement Opportunity should be read in conjunction with C4 and C9 previous.</p>	Compliant	IO1
E13	Before any vegetation clearing or tree removal that must be offset, the Proponent must purchase and retire Biodiversity credits specified in Table 1 below. The retirement of credits must be carried out in accordance with the offset rules of the Biodiversity Conservation Act 2016 (BC Act). This can be achieved by: (a) Biodiversity Stewardship Agreement under the BC Act; or (b) making payments into an offset fund that has been established by the NSW Government; or (c) providing suitable supplementary measures. [Note: Refer to Instrument of Approval for Table 7]	<ul style="list-style-type: none"> • Biodiversity Conservation Trust Certificate BCF170 dated 28-1-2021 	Biodiversity Conservation Act 2016 section 6.33 confirmation of \$158.6k payment for 6 credits, 1 more than Table 7	Compliant	
E14	The Proponent must submit evidence of the retirement of credits required by Condition E13 to the Planning Secretary for information within one month of receiving the evidence of the retirement of credits and/or a certificate confirming payment under section 63 of the BC Act 2016 before any vegetation clearing or tree removal that must be offset.	<ul style="list-style-type: none"> • Metro>DPIE email entitled “biodiversity offsets” of 28-1-2021. • DPIE>Metro email of 2-2-2021 • Narla Post Clearing Report issued 12-2-2021 (survey undertaken 3-5 February 2021) 	<ul style="list-style-type: none"> • Sydney Metro email sent the same day as Trust Certificate (E13 above) was received. • DPIE email indicated “the Department acknowledges your submission of evidence of the retirement of credits required by Condition E13(b) and A1 (through the Amendment and Submissions Report for the project) and also acknowledges the NSW Biodiversity Trust’s statement confirming payment into the Biodiversity Conservation Fund for the required credits and that this payment satisfies the Biodiversity credit retirement obligations under Conditions of Approval for SSI 10048. 	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Flooding impacts				
E15	Measures identified in the documents listed in Condition A1 to maintain or improve flood characteristics must be incorporated into the detailed design of the SSI. For the purposes of this condition, "maintain" means:	<ul style="list-style-type: none"> General Arrangement Plan drawings 0013/11814 Sheets 3- 7 Issue 6 dated 5/2/2021. Planning Approval Evidence Memo TEJ-MEM-0101 dated 22/06/21 	<p>The design incorporated IES and SIS Amendment Report stormwater management measures such as batter chutes and vegetated swales (mitigating run-off from Carparks A, C and D). Two (2) onsite detention tank(s) or OSD's were located in the Speedway itself and adjoining competitor Carpark B, these noted in the GA drawings as being of 1,200 m³ and 1,500 m³ capacities.</p> <p>However, no specific current design information could be provided to unequivocally demonstrate that flooding performance objectives (refer subclauses below) during the Speedway operation would be achieved.</p> <p><u>Further information supplied post audit:</u> GA drawings and Turnbull Memo (alongside) did not address the identified and compliance, with no material update to the original information in the subclauses below.</p> <p>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.</p>	Non-compliant	NC6
	a) a maximum increase in inundation levels upstream of the SSI of 50 mm in a 1% AEP rainfall event;	<ul style="list-style-type: none"> No formal project evidence provided 	Sydney Metro solicited response from their designer indicated "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)"	Non-compliant	
	b) no increase in flood inundation levels in the Warragamba Pipelines corridor	<ul style="list-style-type: none"> No formal design performance evidence No drainage designs provided for southern site exit and permanent stockpile area 	<p>There was no compliance evidence such as models, calculations, drainage designs or compliance certification to determine Planning Approval compliance.</p> <p>Additionally, the following statements were noted:</p> <ul style="list-style-type: none"> Speedway Amendment Report: " Appropriate drainage would be provided in the southern area of the project site, so that safe access to the Warragamba Pipelines corridor for WaterNSW is maintained". 	Non-compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
			<ul style="list-style-type: none"> Designer words: "Catchment area draining to Warragamba Pipelines Corridor is unchanged. Therefore, there is to be no increase in flood inundation levels in the Warragamba Pipelines Corridor" <p>NOTE: Above response provided to <u>this</u> audit is unacceptable compliance evidence.</p>		
	c) a maximum increase in inundation time of one hour in a 1% AEP rainfall event;	<ul style="list-style-type: none"> As above 	No evidence to assess compliance	Non-compliant	
	d) no impact on emergency management; and e) no impact on essential services and infrastructure.	<ul style="list-style-type: none"> No definitive evidence provided 	Information sighted through other Planning Approval verifications <u>herein</u> appeared to address subclauses d) and e)	As above	
E16	Condition E15(a) does not apply in relation to detention of water between Carpark C and Carpark D as identified in the documents listed in Condition A1 as a result of drainage changes to prevent overtopping of Ferrers Road in the 1% AEP event.	<ul style="list-style-type: none"> General Arrangement Plan Sheets SM-0103, 0302 3- 7 Issue 6 dated 5/2/21 	SM-0103 specified a 2m x 2.6m x 2.6m (W x L x D) detention pit. The stormwater detention provided in this location was indicated as addressing Blacktown City Councils requirements for permissible site discharge (PSD). The PSD is achieved for the 1% AEP without Ferrers Road overtopping.	Compliant	
E17	Flood information developed during detailed design , such as flood reports, models and geographic information system outputs, and work as executed information from a registered surveyor certifying finished ground levels, the dimensions and finished levels of all structures constructed as part of the SSI within flood prone land, must be provided to the council, EESG and the SES in order to assist in preparing relevant documents and to reflect changes in flood behaviour as a result of the SSI. The Council, EESG and the SES must be notified in writing that the information is available no later than one (1) month following the completion of construction. Information requested by the Council, EESG or the SES must be provided no later than six (6) months following the completion of construction or within another timeframe agreed with the council, EESG and the SES.		<p>Sydney Metro confirmed their intention to submit all stormwater drainage work as executed drawings as soon as completed and provide required notification of completion as per condition E17.</p> <p>Also Sydney Metro indicated that as the subject lot is not subject to local flooding or mainstream flooding per Blacktown Council's online portal for flood information (below), a flood assessment was not required as part of the Detailed Design. http://maps.blacktown.nsw.gov.au/</p>	Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Heritage				
E18	An Unexpected Heritage Finds and Human Remains Procedure must be prepared to manage unexpected heritage finds in accordance with any guidelines and standards prepared by the Heritage Council of NSW or Heritage NSW.	<ul style="list-style-type: none"> Sydney Metro Unexpected Heritage Finds Procedure v3.3v dated June 2020 	The adopted Unexpected Heritage Finds Procedure had been previously prepared for the City & South-west Sydney Metro project in accordance with required heritage guidelines and standards.	Compliant	
E19	The Unexpected Heritage Finds and Human Remains Procedure must be prepared by a suitably qualified and experienced heritage specialist and submitted to the Planning Secretary for information no later than two weeks before the commencement of construction	<ul style="list-style-type: none"> As above Metro>DPIE email entitled "Construction Commencement date and Heritage Finds Procedure" of 14-12-2020. 	<p>The Procedure had been prepared by the Senior Heritage Advisor employed by Sydney Metro for the City & South-west Sydney Metro project, deemed compliant for that project.</p> <p>Notification to DPIE was by email which intimated intention to commence construction on 18 December 2020 (i.e. not within the 2 weeks), however this was prior to the Planning Approval, and construction commenced later around 12 January 2021.</p>	Compliant	
E20	The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of construction.			Not triggered	
E21	If any unexpected heritage finds are identified during the work described in the documents listed in Condition A1, details of any archival recording, further historical research either undertaken, or to be carried out and archaeological excavations (with artefact analysis and identification of a final repository for finds), must be documented in accordance with any guidelines and standards required by the Heritage Council of NSW and Heritage NSW. These details must be provided to the Planning Secretary and relevant Government agencies for information no later than 12 months after the completion of the work.	<ul style="list-style-type: none"> 		Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Note: Human remains that are found unexpectedly during the carrying out of work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.				
	Noise and Vibration impacts				
E22	A detailed land use survey must be undertaken to confirm sensitive land uses (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration, construction ground-borne noise and operational noise. The results of the survey must be included in the Noise and Vibration Impact Statement required by Condition E27	<ul style="list-style-type: none"> • CNVIS (E27 below) 	CNVIS s2.1 Table 2: Noise Catchment Areas & Surrounding Land Uses identified 7 Noise Catchment Areas or NCAs including residential, commercial and industrial uses. Given usage and that most receivers were more than 700 m distant, no receivers were identified as sensitive, nor were any operating theatres or laboratories identified.	Compliant	
E23	Work must only be undertaken during the following construction hours: <ol style="list-style-type: none"> 7:00am to 6:00pm Mondays to Fridays, inclusive; 8:00am to 6:00pm Saturdays; and at no time on Sundays or public holidays. 	<ul style="list-style-type: none"> • Construction Program, Speedway Project dated 13/01/21 • Daily Shift Diaries, 8/3/21 & 17/3/21 <u>Subcontractor docketts:</u> <ul style="list-style-type: none"> • BHCivil dated 4/3, 16/3, 25/3 & 27/3 • Flomar Civil, 2/3, 18/3, 27/3 • R&J and Sitex Plant Hire, 11/3 	Other than low impact works of (E24) below, most work during the IEA assessment were within standard construction hours. Sighted subcontractor documentation indicating start times between 06:45 and 18:00	Compliant	
E24	Notwithstanding Conditions E23 work may be undertaken outside the hours specified in the following circumstances:		Refer E24 (b) further	Compliant	
As above	<p>(a) Emergencies, including:</p> <ol style="list-style-type: none"> for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm. <p>On becoming aware of the need for emergency work in accordance with (a) the Proponent must notify the ER, the Planning Secretary and the EPA of the reasons for such work. The Proponent must use best endeavours to notify all noise and/or vibration affected sensitive receivers of the likely impact and duration of those work.</p>	<ul style="list-style-type: none"> • 	No emergencies were reported during the IEA period.	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
As above	<p>(b) Low impact, including:</p> <p>(i) construction that causes LAeq (15 minute) noise levels:</p> <ul style="list-style-type: none"> no more than 5 dB(A) above the rating background level at any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009), or no more than the 'Noise affected' noise management levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses; or <p>(ii) construction that causes LAFmax (1s minute) noise levels no more than 15 dB(A) above the rating background level at any residence; or</p> <p>(iii) construction that causes:</p> <ul style="list-style-type: none"> continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006); 	<ul style="list-style-type: none"> Noise & Vibration Monitoring Record, dated 23/2/21 	<p>Some low-impact works including deliveries and earthworks had taken place Out of Hours (OOHs), the CNVIS of E27 predicting there would be no shoulder or night-time exceedances of Noise Management Levels (NMLs) for typical works at this time.</p> <p>There had been no complaints during the IEA period – refer Condition B4</p>	As above	
As above	<p>(c) By Agreement, including:</p> <p>(i) negotiated agreements with directly affected residents and sensitive land uses.</p>		No negotiated agreements were reported during the IEA period.	As above	
E25	<p>Where a negotiated agreement is proposed in order to undertake out-of-hours work, the Proponent must identify appropriate respite periods for the out-of-hours work in consultation with the community at each affected location on a regular basis. This consultation must include providing the community with:</p> <ol style="list-style-type: none"> a schedule of likely out-of-hours work for a period no less than three (3) months; the potential work, location and duration; the noise characteristics and likely noise levels of the work; and likely mitigation and management measures. <p>The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the Planning Secretary upon request.</p>	<ul style="list-style-type: none"> 		Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E26	Highly noise intensive work that result in an exceedance of the applicable NML at the same receiver must only be undertaken: a) between the hours of 8:00 am to 6:00 pm Monday to Friday; b) between the hours of 8:00 am to 6:00 pm Saturday; and c) if continuously, then not exceeding three (3) hours, with a minimum cessation of work of not less than one (1) hour. For the purposes of this condition, 'continuously' includes any period during which there is less than one (1) hour between ceasing and recommencing any of the work that is subject of this condition.	•		Not triggered	
E27	A detailed Noise and Vibration Impact Statement must be prepared based on realistic construction scenarios, plant and equipment, and site layout and include:	• CNVIS v2.0 dated 23/12/2020.	Construction Noise and Vibration Impact Statement prepared by SLR Consulting was available.	Compliant	
As above	a) rating background levels identified from background noise monitoring; b) noise management levels for each sensitive receiver; c) mitigation measures incorporated, including shielding effects of ancillary infrastructure or topography, and justification for selection where multiple options are available; d) comparison of impacts against the NMLs identified in (c); e) the extent of exceedances; f) the likelihood of sleep disturbance or impact to ecological processes (such as foraging or other activities of nocturnal species known to be present in Prospect Nature Reserve); g) the duration of work outside of standard construction hours; h) noise mitigation to be adopted and implemented.	• As above • Desktop Ecological Noise Impact Assessment by Narla dated 8/02/2021	a) Ss2.1 Table 4 b) Table 9 NMLs for the 7 NCAs c) Tables 20 & 21 (Standard and Additional Mitigation Measures) d) Tables 16 & 17, worst case predicted NMLs at Residential and Commercial Receivers respectively e) Table 19, Predicted Number of NML Exceedances, indicated as being 9 in total, these < 10dBA above and "typically marginal to minor" f) CNVIS Table 1 states this to be addressed by Construction Contractors Ecologist ** g) s4.1.1.2 covers work outside of standard construction hours for the duration of project h) s7 Mitigation and above-mentioned Tables 20, 21 et al. ** Ecologist report determined that "it is deemed unlikely that the proposed works would result in a significant disruption to the ecological processes of the nocturnal fauna present within the Prospect Nature Reserve."	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
As above	The detailed Noise and Vibration Impact Statement must be prepared in consultation with the relevant council and submitted to the ER one month prior to the commencement of construction, unless otherwise agreed by ER.	<ul style="list-style-type: none"> BCC>Metro>WSPT email entitled "SIS CNVIS" of 24-12-2020. 	BCC confirmation of having "no concerns with the CNVIS"	As above	
E28	<p>Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria:</p> <p>a) construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009);</p> <p>b) vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); and</p> <p>c) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions".</p>	<ul style="list-style-type: none"> 	Vibration was not triggered, otherwise, relevant noise mitigation measures were evidenced as implemented as described in varying sections of <u>this</u> report.	Not triggered	
As above	<p>Any work identified as exceeding the noise management levels and/or vibration criteria must be managed in accordance with the Noise and Vibration Impact Statement.</p> <p>Note: The Interim Construction Noise Guideline identifies 'particularly annoying' activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction Noise Management Level.</p>	<ul style="list-style-type: none"> 		As above	
E29	At-property treatment must be provided to the properties identified in Table 38 of the Noise and Vibration Technical Paper (dated July 2020), unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> Assessment Offer Letters dated 1/02/2021. Assessment Offer Reminder Letter dated 17/02/2021. Assessment Offer Reminder Letter dated 3/03/2021 	<p>The Project Communications team project had commenced formal engagement with the few identified at-property treatment residences during the IEA period.</p> <p>Prior to <u>this</u> report completion (subsequent to associated audit reviews) it was noted that face-to-face engagements, offer acceptances, and assessment by the specialist noise management consultant had commenced - this to be followed up during the next IEA.</p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E30	Operational noise mitigation measures as identified in the documents listed in Condition A1 that will not be physically affected by work, must be implemented within three (3) months of the commencement of construction in the vicinity of the impacted receiver to minimise construction noise impacts, and detailed in the Noise and Vibration Impact Statement for the SSI.		The 3-month deadline did not fall within the IEA period of section 2.5 of <u>this</u> report, and was therefore deemed to be technically compliant. Notwithstanding the above, it was evidenced that potentially affected residences had not complained of noise, and were not overly eager to embrace treatment, plus the CNVIS had predicted low impacts in the first instance – refer E24 (b) above.	Compliant	
E31	Where implementation of operational noise mitigation measures is not proposed in accordance with Condition E30, the Proponent must submit to the Planning Secretary a report providing justification as to why they will not be implemented, along with details of temporary measures that would be implemented to reduce construction noise impacts, until such time that the operational noise mitigation measures identified in the documents listed in Condition A1 are implemented. The report must be submitted to the Planning Secretary before the commencement of construction that would affect the identified sensitive receivers.		Refer E30 and E31 above, noting the intent of the Proponent to implement measures in the next IEA temporal period. Also, and given low noise impacts previously mentioned, a deadline for submission of a report did not appear to be triggered given construction was not impacting / affecting the identified sensitive receivers.	Compliant	
E32	Operational Noise Compliance Report <i>Requirements not articulated in <u>this</u> report for brevity purposes.</i>			Not triggered	
Socio-Economic, Land use and Property					
E33	The Proponent must identify the utilities and services (hereafter "services") potentially affected by Construction to determine requirements for adjustment, relocation, diversion, protection and/or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. The Proponent in consultation with service providers must ensure that disruption to services resulting from the construction of the SSI are avoided and advised to customers.	<ul style="list-style-type: none"> • IFC Utility Drawings UT-0011 and 0101 – 0108 dated 20/11/2020. • Turnbull Detailed Design MEMO 0037 dated 04/09/2020. 	Utility drawings pack showed existing and proposed utilities. The Combined Utilities Pothole Plan, Appendix C to the Detailed Design Project scope of works reflected Endeavour Energy, NBN and Jemena (Dial Before You Dig) DBYD searches, as per REMM HR1 Survey drawings were also available for Sydney Water as-built assets, plus consultation with the Sydney Water coordinator for protection of asset scope of works had been undertaken.	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Soil				
E34	All reasonably practicable erosion and sediment controls must be installed and appropriately maintained to minimise water pollution. When implementing such controls, any relevant guidance in the Managing Urban Stormwater series must be considered.	<ul style="list-style-type: none"> Various evidence cited throughout this report 	The construction contractor had engaged the services of a specialist soil conservation list (SEEC), who together with experienced team were ongoingly implementing, improving and maintaining ERSED controls. These appeared to be in accordance with the "Blue Book" for the audit period	Compliant	
E35	The permanent stockpile to be located on Lot 1 DP 1077822 must be designed and treated to ensure a stable landform and that existing drainage paths from the Warragamba pipeline corridor are not impeded.	<ul style="list-style-type: none"> Stockpile Volume survey, dated 30/03/2021 1 page scan of Transport for NSW specification R44 clause 7.4 compaction 	<p>Current stockpile material was noted as being 4,688 m³.</p> <p>No engineering design or construction plan could be evidenced to demonstrate that the permanent stockpile would be stable, not erode and cause soil or silt to impede existing drainage paths or enter the Warragamba pipeline corridor. This, at any stage, including treatment and establishment of turf, plus associated initial irrigation and rainfall risks.</p> <p>Note: Sydney Metro provided an informal response around potential use of Transport for NSW specification R44 clause 7.4 compaction (highlighting Earth mound compaction of 90%), however profile / batter slopes / volume was not specified, and neither was an Inspection & Test Plan construction assurance process</p>	Non-compliant	NC7
As above		<ul style="list-style-type: none"> Planning Approval Evidence Memo TEJ-MEM-0101 dated 22/06/21. General Arrangement sheet 0013/11814 dated 16/6/2021 attached above-mentioned. 	<p><u>Further information supplied post audit:</u></p> <p>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.</p> <p>Additionally, a Technical Memo dated 22 June 2021 was also provided, this depicting overland drainage flow paths. Apart from nominating a batter slope and 2 conflicting stockpile heights (3.0m v 2.5m), the GA document essentially only depicted a 2-dimensional footprint.</p> <p>Finally, neither of the new documents provided a specification on how to achieve stability from a slump and erosion perspective.</p>	As above	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Contaminated sites				
E36	An Unexpected Contaminated Land and Asbestos Finds Procedure must be prepared before the commencement of construction and must be followed should unexpected, contaminated land or asbestos (or suspected contaminated land or asbestos) be excavated or otherwise discovered during construction.	<ul style="list-style-type: none"> Unexpected Finds Soil Contamination and Asbestos Procedure dated December 2020 	<p>Unexpected Finds Soil Contamination and Asbestos Procedure was available as Annexure D of the Construction Soil & Surface Water Management Sub Plan.</p> <p>Procedure followed during finds of asbestos per E37 below</p>	Compliant	
E37	The Unexpected Contaminated Land and Asbestos Finds Procedure must be implemented throughout construction.	<ul style="list-style-type: none"> Asbestos Management Plan by Hibbs, v5 dated 23/2/2021. Clearsafe Environmental Solutions Certificate of Analysis dated 17/12/2020 	As required by the Unexpected Finds Soil Contamination & Asbestos Procedure (and REMM C3), the Contractor engaged specialist Hibbs & Associates early in the piece to develop an Asbestos Management Plan. Apart from asbestos management procedures during earthworks the AMP also proposed an on-site burial location.	Compliant	
As above		<ul style="list-style-type: none"> ER Inspection Report #3 dated 4/2/2021 	<p>Various ER reports confirmed ongoing management of asbestos finds e.g. "Car Park D, exclusion zones for asbestos material removal works installed, covered stockpiles containing asbestos containing material (ACM) were observed".</p> <p>IEA site inspection on 31/3/21 observed boxed excavation site of a small, unexpected asbestos find on Car Park D Mound, awaiting clearance certification by hygienist.</p>	As above	
E38	The Proponent must engage an NSW EPA accredited Site Auditor to ensure that any work required in relation to soil, groundwater, or ground gas contamination is appropriately managed		Construction Contractor was in the process of developing a scope of work for the Site auditor at the time of audit.	Not triggered	
E39	The Proponent must obtain a Section A1 Site Audit Statement - or a Section A2 Site Audit Statement accompanied by an Environment Management Plan - from the Site Auditor and submit it to the Environmental Representative and to the Planning Secretary before the commencement of operation. The Site Audit Statement must certify the site is suitable for the proposed use.			Not triggered	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
	Utilities Management				
E40	Nothing in this approval permits the carrying out of any utility work that is not described in the documents listed in Condition A			Not triggered	
	Urban Design, Visual Amenity and Sustainability	•			
E41	The SSI must be designed and built, in consultation with the Western Sydney Parklands Trust and Council, having regards to the: <ol style="list-style-type: none"> Western Sydney Parklands SEPP; Western Sydney Park/ands Urban Design Manual (2020), including sustainability considerations; Good design outcomes in Better Placed (NSW Government Architect, 2017); and principles of green infrastructure and outcomes in draft Greener Places (NSW Government Architect, 2020). 	<ul style="list-style-type: none"> Metro>WSPT email entitled "Landscaping plant species" of 21-07-2020. Designers Memo for Landscape Design 	<p>Correspondence with WSPT evidenced consultation with WSPT regarding landscaping plant species, and lengthy leads times for orders.</p> <p>Design memo is 3.9 Landscape Design showed adherence to WSPT Master Plan including selection from WSPT endemic species list etc.</p>	Compliant	
E42	<p>The Proponent must construct and operate the SSI with the objective of minimising light spill to surrounding properties and effects on foraging behaviour or flight paths of nocturnal bird and bats known to utilise Prospect Nature Reserve All lighting associated with the construction and operation of the SSI must be consistent with the requirements of AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting ,relevant Australian Standards in the series AS/NZ 1158 - Lighting for Roads and Public Spaces and give consideration to the National Light Pollution Guidelines for Wildlife including Marine Turtles, Seabirds and Migratory Shorebirds (Commonwealth of Australia 2020).</p> <p>Additionally, the Proponent must mitigate residual night lighting impacts to protect existing or approved (as at the date of this approval) properties adjacent to the SSI and must consult with affected landowners.</p>		<p>The contractor was developing a lighting design at the time of audit, planning to undertake an ecologist assessment to assess light spillage impacts on fauna species.</p> <p>Sydney Metro indicated that a Consistency Assessment could be undertaken for the above scope of works.</p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E43	Operational maintenance and transfer of assets. <i>Requirements not articulated in <u>this</u> report for brevity purposes</i>			Not Triggered	
E44	The Proponent must ensure that the SSI design minimises impacts to visual amenity, the increase in impervious surfaces and maximises shade to avoid heat island effects.	<ul style="list-style-type: none"> Turf Landscape Documentation set, IFC dated 6/11/2020 	Landscaping drawings showed proposed landscaping and turfing areas, schedules indicating 337 Canopy trees and 205 Understory trees to address shading, visual amenity and heat island effects. Turf was also specified including that beneath concrete seating. Rubberised soft fall paving would slightly reduce heating effects, although car parks and some footpath areas were concrete and/or bitumen, a hard surface still required in the car parks for some motorsport activities. Visual amenity from an external perspective appeared to be addressed by numerous tree plantings indicated on project perimeters.	Compliant	
	Waste				
E45	Waste generated during construction and operation must be dealt with in accordance with the following priorities: <ol style="list-style-type: none"> waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of. 	<ul style="list-style-type: none"> Waste Diversion Report, by Grasshopper - (November 2020 - February 2021) 	<p>Comprehensive Waste Diversion Report was provided by the waste contractor. For the first 4 months, from the 64 tonnes generated, the project diverted 96% from landfill w/w basis including concrete, timber and steel, with some 20% diverted to energy.</p> <p>Around 90,000 m³ of excavated material was expected to be reused for the Speedway Precast Facility.</p> <p>The IEA site inspection sighted waste segregation, as did ER reports both evidenced elsewhere in this report.</p>	Compliant	
E46	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, or to any other place that can lawfully accept such waste.	<ul style="list-style-type: none"> N235 ENV005-F01 Waste and Material Tracking Log rev1 Suez Report of 30/03/21 movement Suez Delivery Docket receipts, scans 	<p>ACM waste was tracked, including docket number, disposal location being SUEZ Elizabeth Drive Waste Management Centre.</p> <p>9 delivery dockets sighted for 154.04 tonnes.</p> <p>Suez Recycling & Recovery Environment Protection Licence EPL 4068 maintained on file by the contractor.</p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E47	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	<ul style="list-style-type: none"> Contamination Report by Alliance Environmental Solutions, dated 17/3/2021 	ACM waste classification (of above waste) had been undertaken by Alliance, claiming that Laboratory data was assessed against NSW EPA (2014) Waste Classification Guidelines.	Compliant	
Water Quality impacts					
E48	The SSI must be designed, constructed and operated so as to maintain the <i>NSW Water Quality Objectives</i> where they are being achieved as at the date of this approval, and contribute towards achievement of the <i>NSW Water Quality Objectives</i> over time where they are not being achieved as at the date of this approval, unless an EPL in force in respect of the SSI contains different requirements in relation to the <i>NSW Water Quality Objectives</i> , in which case those requirements must be complied with.	<ul style="list-style-type: none"> Turnbull Stormwater Water Quality & Drainage design MEMO 0111 dated 15/01/2021. Stormwater Management General Arrangement Plan drawings 0013/11814 Issue 6 dated 5/2/21 	<p>Refer to Condition C3 (e) and C9, the Soil & Water Management Plan s9.3.1 addressing NSW WQOs and use of more appropriate parameters.</p> <p>The design focused on Blacktown City Council's WSUD (also required by REMM SSW6) indicating use of BCC's MUSIC models, leading to the specification of OceanGuard systems (filtration bags remove gross pollutants and suspended solids) followed by StormFilters (media-filled cartridges to absorb pollutants). The Memo concluded the design and integration of these products would improve the networks water quality and meet BCC's WSUD Developer Handbook water quality targets for TSS, TP and TN.</p> <p>IA note - no information of Total Hydrocarbon post development reduction performance of 90% of average annual loads though.</p> <p>GA drawings evidenced Stormwater Inlet Pits and StormFilter Chambers</p>	Compliant	
E49	All new or modified drainage systems associated with the construction and operation of the SSI (including but not limited to, watercourse crossings, stream diversions, drainage swales and depressions) must be designed and carried out in accordance with Sydney Water standards and any relevant guidelines, to meet capacity constraints of council and Sydney Water's drainage systems, minimise impacts on the receiving environment and be designed by a suitably qualified and experienced person.	<ul style="list-style-type: none"> Stormwater Management General Arrangement Plan drawings 0013/11814 Issue 6 dated 5/2/21 Mark Cameron's CV Metro>BCC email entitled "Stormwater Drainage Design" of 15-02-2021. 	<p>The stormwater drainage design had been completed by Turnbull Engineering, a suitably qualified and experienced person evidenced by CV of their specialist Principal Flooding and Drainage Engineer.</p> <p>With most stormwater impacting BCC lands, Sydney Metro had provided stormwater drainage designs for information. Interfacing with existing Sydney Water stormwater systems appeared to be minimal.</p> <p>GA drawings evidenced Batter Chutes and Scours</p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
E50	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.	<ul style="list-style-type: none"> Turf Design Studio Landscape GA Drawing L-209 Sheet 9, rev 1 Issue for Construction dated 6/11/2020 	<p>No engineering design or construction plan could be evidenced to demonstrate that the permanent stockpile would not cause surface water run-off to enter the Warragamba pipeline corridor.</p> <p>Landscape GA drawings provided only showed indicative stockpile footprint and turf treatment, not indicating:</p> <ul style="list-style-type: none"> water run-off and drainage arrangements landscaping profile and contours batter slope <p>It was acknowledged that changed and changing spoil removal and disposal deliberations were underway at the time of the audit. Sydney Metro intimated (but did not evidence) that the mound was anticipated to be around 2.5 m in height with 2:1 batters. Furthermore, there was no engineering specification for fill characteristics and compaction performance, nor any Inspection & Test Plans to assure the process or provide technical compliance records.</p>	Non-compliant	NC8
As above		<ul style="list-style-type: none"> Planning Approval Evidence Memo TEJ-MEM-0101 dated 22/06/21 	<p><u>Further information supplied post audit:</u></p> <p>Further to condition E35-related Audit Findings regarding permanent stockpile design, there was no materially new information supplied. A <u>construction</u> plan including surface water containment and drainage specification to (demonstrate and) ensure that surface water run-off would not enter the Warragamba pipeline corridor was not forthcoming.</p>		
E51	<p>If damage to the Warragamba pipeline corridor or associated bulk water supply infrastructure occurs as a result of the construction of the SSI, the Proponent must either (at the landowner's discretion):</p> <p>(a) compensate the landowner for the damage so caused. The amount of compensation may be agreed with the landowner, but compensation must be paid even if no agreement is reached;</p> <p>or</p> <p>(b) rectify the damage to restore the road to at least the condition it was in pre-construction.</p>	<ul style="list-style-type: none"> SSI 10048 Planning Approval Allocation spreadsheet dated 23/12/20. General correspondence SMWSPC-SMD-SPC-SMD-GEN-000056 dated request for Allocation confirmation dated 15/01/21. Final GC21 Execution version of Schedule 20 Baseline Planning Approval Conditions B3 (27/07/20) 	<p>There was no objective evidence to demonstrate formal accountability, assessment and provisioning for inadvertent Warragamba Pipeline or corridor damage during construction, including formal acceptance of Planning Approval obligations by the contractor i.e.</p> <ul style="list-style-type: none"> Contract Schedule 20 omits Condition E51. No formal contractor acknowledgement to SM "General Correspondence" Teambinder request to confirm allocation of Planning Approval The executed contract did not demonstrate definitive acceptance of Condition E51 No Dilapidation/Asset Condition Survey of said corridor road had been undertaken. 	Compliant	IO5

APPENDIX F: Audit Findings (Revised Environmental Mitigation Measures)

Further to REMM's already verified through implementation assessment of Management Plans and other consent conditions, the remainder below were identified by exception, based on perceived risk, uniqueness, applicability at the time, and not implicit in consent conditions.

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
TTP1	In the event of a traffic related incident, coordination would be carried out with Transport Coordination and/or the Transport Management Centre's Operations Manager.	<ul style="list-style-type: none"> CTMP, as indicated previously 	Construction Traffic Management Plan section 23 requires notification to the TMC and Appendix 1, Emergency Response Plan.	Not triggered	
TTP2	Access to other properties within Western Sydney Parklands' Precinct 5: Eastern Creek Motor Sports would be provided at all times, including for emergency vehicles.	<ul style="list-style-type: none"> Various rec evidenced herein. Site inspection in general precinct observations during this audit 	No practical instances observed where there would be access issues.	Compliant	
TTP3	All trucks would enter and exit construction sites in a forward direction, where feasible and reasonable.	<ul style="list-style-type: none"> Site inspection during this audit Vehicle Management Plans 09-03, 17-03 and 07-04 	Forward direction during exit and entry to site observed, there being no practical instances where this would otherwise occur. VMPs indicated required movements and the case of Pipeline Park (permanent stockpile) entry via Gate 5 and exit through Gate 6 prevented the need for reversing.	Compliant	
TTP4	Construction site traffic would be managed to minimise movements along Ferrers Road and the surrounding road network during peak periods.	<ul style="list-style-type: none"> Construction Traffic Management Plan (No evidence of implementation though) 	Not addressed in CTMP or implemented, noting new Spoil Haulage truck movements additionally including the Horsley Road roundabout.	Non-compliant	NC9
TTP5	Parking for construction personnel would be provided on-site and not on surrounding local streets.	<ul style="list-style-type: none"> Site inspection during this audit 	Ample onsite parking available and observed	Compliant	
TTP6	During major events at Sydney Dragway, impacts to the transport and traffic network would be reduced by (as necessary): <ul style="list-style-type: none"> Avoiding the use of the spectator access road by construction traffic during Sydney Dragway major events Minimising the level and nature of construction activity pre, during and post events Maintaining appropriate access to all areas within the Western Sydney Parklands Precinct 5: Eastern Creek Motor Sports Scheduling deliveries to the project site outside of event periods, when possible. 	<ul style="list-style-type: none"> Principal Contractor handovers of 11/12/2020 and 7/01/2021 & 12/03/2021 Abergeldie Superintendent reminder email dated 8/4/21 	<p>Formal handover information with Sydney Dragway evidenced reduction of construction activities.</p> <p>Deliveries to site appeared to be minimised with emails sent to project team to advise suppliers accordingly.</p>	Compliant	

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
TTP7	<p>Temporary offset parking for Sydney Dragway would be established prior to commencement of construction. This would include a total of around 2400 dedicated parking spaces for Sydney Dragway comprising of:</p> <ul style="list-style-type: none"> Retention of about 800 existing spaces in the existing P2 Dragway car park outside of the project footprint A minimum of 1600 spaces within the project site for use by visitors to Sydney Dragway during events. For larger events at Sydney Dragway, additional parking spaces within the Sydney Motorsports Park (operated by the Australian Racing Drivers Club) would also be made available. During these events, a shuttle bus service would be provided between this parking and the Sydney Dragway. 	<ul style="list-style-type: none"> Car Slots Car Park D2, Surveyor plot, undated Line marking design for Temporary Carpark 2, undated Principal Contractor handover of 12/03/2021 Timelapse photographic footage during events, dated 8/1/2021 (Carpark D), 9/1/2021 (A & D) and 9/4/2021 (D) 	<p>Surveyor plots of potential car spaces indicated some 870 spots in Carpark C and D, with Carpark A been able to be temporarily prepared if required.</p> <p>Principal Contractor handover records at item 18 indicated event parking checks.</p> <p>Timelapse camera footage during events appeared to indicate adequacy of parking provided.</p>	Compliant	
WM1	Waste would be assessed, classified, managed, transported and disposed of in accordance with the Waste Classification Guidelines and Protection of the Environment Operations (Waste) Regulation 2014.	<ul style="list-style-type: none"> Appendix E herein 	To the extent applicable, evidence demonstrated compliance	Compliant	
WM4	A material tracking system would be implemented for material transferred to offsite locations such as licensed waste management facilities.	<ul style="list-style-type: none"> N235 ENV005-F01 Waste and Material Tracking Log rev1 	Refer Appendix E, condition E46	Compliant	
SSW5	<p>An onsite surface water monitoring program would be implemented to observe any changes in the quality of runoff from the project site prior to discharge.</p> <p>The program would be developed in consultation with the EPA and Blacktown City Council, where required. Monitoring would occur at all points of discharge within the project site and would include sampling for key indicators of concern.</p>	<p>Information and records per Appendix C above:</p> <ul style="list-style-type: none"> Environment Inspection (checklist) reports Dewatering Inspection Checklist records 	<p>CSWMP s 7 Environment Mitigation & Management Measures in particular Table 9 required that:</p> <p><i>“During rain events when water is discharging from the site (and if safe to do so), daily visual assessments will be made of water quality in the unnamed drainage line between Carpark C and Carpark D (if any flows occur), Eastern Creek and Prospect Reservoir (if accessible)) and along site boundaries to check for any potential impacts of discharges from the site, including comparing upstream and downstream locations. Locations for potential visual monitoring are shown in Figure 5.</i></p>	Compliant	IO6

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
			Acknowledging that there had been very little off-site water run-off, and discharges were controlled through dewatering inspections, there was no photographic evidence or otherwise to demonstrate that visual observations of surface water run-off quality had been undertaken during rain events at off-site locations identified in figure 5:		
B1	Opportunities to minimise the amount of vegetation clearance within the project site would be considered as part of further design development where feasible and reasonable.	<ul style="list-style-type: none"> Consistency Assessment, SIS 02 Drainage Design Footprint, approved 25-2-21. Abergeldie photo of retained tree. 	<p>EIS Submissions and resulting Amendment Report indicated that design changes to reduce flooding potential would also reduce vegetation clearing.</p> <p>Whilst the CA indicated consistency and minimised clearing area required, reduction was not achieved due to safety related constructability issues though – refer 4.6 of the body of this report. Some retained trees were observed though</p>	Compliant	
B2	Biodiversity offsets (ecosystem credits) would be acquired in accordance with the Biodiversity Assessment Method due to impacts on native vegetation.	<ul style="list-style-type: none"> CA above and (Attached) BAM Credit Summary Report dated 16-2-2021 	Jacobs utilised the BAM Calculator in the confirmation of credits needed/available with respect to a Consistency Assessment. Otherwise, refer to prior Appendix, E13.	Compliant	
GW2	A geotechnical assessment, contamination assessment and earthworks design would ensure that long-term leaching of excavated materials (such as acid rock drainage from Bringelly Shale and saline soil and rock) does not pose a risk to groundwater.	<ul style="list-style-type: none"> Factual Contamination Assessment Report, Golder-Douglas Partners dated 14/5/2020. Geotechnical Interpretive Report, Golder-Douglas Partners dated 25/5/2020 	<p>Geotechnical and contamination assessments were undertaken, with the Interpretive Report seemingly indicating low risk to groundwater, the paragraph at 10.4 stating:</p> <p><i>“Although groundwater is relatively deep at this site (<10m) there may be seasonally elevated perched water tables in full materials. These perched water systems could impact retaining walls and excavation for slopes and obligations”</i></p>	Compliant	
GHG1	Energy efficiency would be considered further during detailed design development, with energy efficient systems installed where feasible and reasonable. This would include consideration to the use of motion sensor activated and/or independent solar powered CCTV systems and LED lighting technology.	<ul style="list-style-type: none"> Lighting Layout drawing E010 dated 13/11/20. Pits Roof plan A-21-32 dated 13/11/20 	<p>Drawings / plans indicated solar lighting in Carpark A, plus solar panels to be installed, however:</p> <p>Whilst lighting design was still in progress and ecologist advice on light spill minimisation from a nocturnal fauna perspective was awaited, only one (1) carpark (above) would be solar powered, with the remaining carparks indicated as likely to be mains supply for reliability reasons.</p>	Compliant	Obs3

Consent Condition	Requirement	Evidence collected	Audit Findings & Recommendations	Status	ID
GHG2	<p>Opportunities to optimise the project design to minimise greenhouse gas emissions during operation would be considered during design development, including considerations relating to:</p> <ul style="list-style-type: none"> Track design to minimise ongoing plant maintenance. Waste management strategy and design to minimise waste to landfill during operation. 	<ul style="list-style-type: none"> Pavement Profile detail drawing PV 0201 dated 2/12/2020 	<p>Pavement drawings showed cross section of the track pavement, with 500mm of clay for the topping designed to minimise the need for significant rework by plant.</p> <p>Operational waste minimisation did not appear to be reasonable or practical and did not appear to be covered.</p>	Compliant	
CC1	Climate change risk treatments would be confirmed and incorporated into the detailed design.	<ul style="list-style-type: none"> Safety in Design report dated 3/6/2020. Retaining Wall drawing set ST-551 dated 24/02/2021. EPS Foam Block Wall drawing, superseded 	<p>SID report also assessed infrastructure risks, potentially impacted by weather. As a result the original foam block wall had been replaced with a Reinforced Soil wall, including the risk of fire impacting the foam blocks. Also, use of (limited) solar lights and PV panels would somewhat reliance on the energy grid.</p>	Compliant	

APPENDIX G: Audit Findings (Site Inspection Photographs)

The following is a snapshot of observational photographs taken during the site inspection (and subsequent site attendance)

<p>Photo 1 – one of many water carts in constant use (dust suppression)</p>  <p>Wednesday, 31 March 2021, 8:37:15 AM</p>	<p>Photo 2 – Protection sign and bunting (designated grey box - forest red gum EEC)</p>  <p>Wednesday, 31 March 2021, 9:08:17 AM</p>
<p>Photo 3 – one of many waste receptacles in use (waste segregation / recycling)</p>  <p>Wednesday, 31 March 2021, 9:44:57 AM</p>	<p>Photo 4 – form of Onsite Detention Basin (used as detention basin, water testing being conducted)</p>  <p>Wednesday, 31 March 2021, 10:32:38 AM</p>
<p>Photo 5 - Site entrance signage (weeds evident with signage obscured)</p>  <p>Thursday, 8 April 2021, 2:13:34 PM</p>	<p>Photo 6 – Site entrance signage (post suggested weed slashing)</p>  <p>Tuesday, 13 April 2021, 8:43:36 AM</p>

Photo 7 – ERSED controls at the north of Carpark C

Silt capture on geofabric post heavy rainfall event. dewatering was taking place off photo.



Wednesday, 31 March 2021, 9:18:53 AM

Photo 8 – Batter Chute construction

Preparatory works behind the retaining wall were underway, noting cleared vegetation leading towards Ferrers Road.



Wednesday, 31 March 2021, 10:42:51 AM

Annexure 1: Planning Secretary Auditor Agreement



Planning,
Industry &
Environment

Mr Todd Brookes
ADirector Sustainability, Environment & Planning Approvals, Metro West

Sydney Metro
PO Box K669
Haymarket NSW 1240

09/04/2021

Dear Mr Brookes

**Sydney International Speedway (SSI-10048)
Independent Environmental Auditor**

I refer to your submission (SSI-10048-PA-7; superseded by SSI-10048-PA-8) nominating Mr Larry Weiss of Quality & Environment Management Professionals (QEM Consulting Pty Ltd) as the suitably qualified, experienced and independent person to undertake the Independent Environmental Audit in accordance with Condition A30, Part A, Schedule 2 of SSI 10048 (Approval) for the Sydney International Speedway (Project).

The NSW Department of Planning, Industry and Environment (Department) has reviewed the nomination and information you have provided and is satisfied that Mr Larry Weiss is suitably qualified, experienced and independent.

Therefore, in accordance with Condition A30, Part A, Schedule 2 of the Approval, the Secretary endorses the appointment of the following auditor:

• Mr Larry Weiss, Quality & Environment Management Professionals (QEM Consulting Pty Ltd).

Please ensure this correspondence is appended to the Independent Environmental Audit Report.

The Independent Environmental Audit must be prepared, undertaken and finalised in accordance with Conditions A29 and A32, Part A, Schedule 2 of the Approval.

The Department reserves the right to request an alternate auditor or audit team for any future audits.

Notwithstanding the endorsement for the above listed auditor for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you wish to discuss the matter further, please contact Mr Alex McGuirk, Senior Compliance Officer, on 8289 6865 or email compliance@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Sherry', with a large, stylized flourish at the end.

Rob Sherry
Team Leader Compliance - Government Projects
Compliance

As nominee of the Planning Secretary

Annexure 2: Stakeholder Consultation

From: "Justine Clarke" <Justine.Clarke@waterNSW.com.au>
To: "IEAuditor@bigpond.com" <ieauditor@bigpond.com>
Sent: Tuesday, 30 Mar, 2021 At 12:19 PM
Subject: WaterNSW response - Audit Scope stakeholder input - Sydney Metro Speedway Project

Dear Larry

Thank you for making contact with WaterNSW and requesting input into the scope for the Speedway project (SSI-10048) independent audit.

WaterNSW provides our initial advice (attached) regarding the project scope, as I believe they provide a good base for the items WaterNSW consider important.

With regards to the development approval, WaterNSW focus is on the following conditions, as they relate directly to impacts to WaterNSW lands, assets and infrastructure.

A1 - in line with EIS/ SR/ AR

C3 (d) (e) - CEMP consultation

C8 (a) (b) - Monitoring consultation

C9 (a) - Monitoring operation

E9 - Dust suppression

E15 (b) - flood mitigations

E34 - Erosion and sediment controls

E35 - Permanent stockpile mitigation's

E50 - Stockpile not to add water to pipelines corridor

E51 (a) (b) - damage remediation to pipelines corridor if required

WaterNSW appreciates you taking our specific focus items into consideration for the audit.

If you have any questions please do not hesitate to contact me.

Kind Regards

Justine Clarke
Catchment and Asset Protection Adviser

Please note: I am currently working from home. I can be reached via email or 0457 535 955



Level 14, 169 Macquarie Street

PO Box 398
Parramatta NSW 2150

M: 0457 535 955

justine.clarke@waterNSW.com.au
www.waterNSW.com.au

----- Original Message -----

From: "Peter Marshall" <petermarshall@optusnet.com.au>

To: "IEAuditor@bigpond.com" <ieauditor@bigpond.com>

Sent: Sunday, 28 Mar, 2021 At 3:13 PM

Subject: RE: Audit Scope stakeholder input - Sydney Metro Speedway Project

Larry

With regards to your specific questions regarding the Sydney Metro Speedway Project Compliance Audit Scope, I provide the following response on behalf of the Western Sydney Parklands Trust (WSPT)

1. Are there any specific focus areas you would like to include within the scope, from a Planning Approval perspective?

You might wish to consider how you propose to audit the Speedway Project Approval CSSI 10048 consent condition given that:

- a) some conditions relate to construction and/or operations; and
 - b) the allocation of responsibilities between
 - the constructing entity (Sydney Metro),
 - the land owner (WSPT); and
 - the speedway operator/lessee (to be advised subject to WSPT RFP 2021/03).
2. Do you have any feedback on the management of complaints?

No.

3. Have there been any observations of off-site environment / community impacts differing to those predicted or expected?

No.

Can WSPT be provided with a copy of the Project Compliance Audit Scope?

Regards

Peter Marshall

Marshall Project Management

Tel: 9909 2418

From: IEAuditor@bigpond.com [mailto:ieauditor@bigpond.com]
Sent: Friday, 26 March 2021 11:07 AM
To: larry@qemconsult.com
Subject: Audit Scope stakeholder input - Sydney Metro Speedway Project

Dear Stakeholder

Your organisation has been identified as a key stakeholder in potentially providing input into the scope of an upcoming Independent Environmental Audit of the Sydney Metro Speedway Project.

Stakeholder consultation regarding audit scope is required by the Independent Audit Post Approval Requirements (Department of Planning May 2020) document aligned with Speedway Project Approval CSSI 10048, in particular Condition of Approval A29 et al. The latter requires the first independent audit within 12 weeks of construction commencement and every 26 weeks thereafter.

By way of introduction and background, QEM Consulting Pty and specifically Larry Weiss has been engaged by Sydney Metro to undertake Independent Environmental Audits of their projects. This first audit is schedule to commence early April 2021 i.e. around the Easter period.

Your input into audit scope

As required by the above-mentioned PAR document, the compliance audit scope as minimum will include every Condition of Approval applicable at the time. The Auditor will assess deliverables and implementation and objective evidence hereof. From a key stakeholder perspective:

4. Are there any specific focus areas you would like to include within the scope, from a Planning Approval perspective?
5. Do you have any feedback on the management of complaints?
6. Have there been any observations of off-site environment / community impacts differing to those predicted or expected?

Please be aware that records of consultation will be reflected in the independent Environmental Audit report, which might become a publicly accessible document. With this in mind, please advise of any privacy requirements.

Acknowledging the upcoming long weekend and/or potential holiday period, any input before Good Friday 2nd April would be most appreciated. Please don't hesitate to call me if easier prior to a written response later. And as mentioned before, there will be another opportunity leading up to the 2nd audit in 6 months' time. And, if you feel there is another stakeholder who should be contacted, please feel free to forward this email, copy myself.

I look forward to hearing from you either way.

Your sincerely

Larry Weiss | Independent Environmental Auditor |

QEM Consulting Pty Ltd | 3 Erwar Close, Westleigh, NSW 2120 |
Mobile: 0409 411 811

Email: IEAuditor@bigpond.com

From: ANDRONOPOULOS, ARTHUR
<ARTHUR.ANDRONOPOULOS@sydneywater.com.au>
Sent: Tuesday, 6 April 2021 3:01 PM
To: 'IEAuditor@bigpond.com'; Larry Weiss
Subject: RE: [External] Audit Scope stakeholder input - Sydney Metro Speedway Project

Hi Larry,

I have not found sufficient time to collate some internal feedback for you. As per your email below, Sydney Water are willing to provide feedback in the second round of the audit schedule.

Some feedback I can give you, is that during the original Sydney Metro Speedway Project environmental review, Sydney Water were pleased with the process and had been given sufficient time to review and respond accordingly.

Please let me know if you would anything further, prior to the next round of audits.

Arthur Andronopoulos

Account Manager, Infrastructure Development

Business Development

Sydney Water, Level 13, 1 Smith Street, Parramatta NSW 2150

Sydney
WATER

Mobile 0447 677 946

arthur.andronopoulos@sydneywater.com.au

Level 1 water restrictions have eased, but stay water wise

[Find out more](#)

Sydney Water acknowledges the traditional custodians of the waters and land on which we work, live and learn.

This email and any attachments to it are confidential. Any unauthorised use or distribution of it is strictly prohibited. If you receive this email in error, please delete it and any attachments.



Annexure 3: Independent Audit Declaration

Independent Audit Report Declaration Form

Project Name: Sydney International Speedway

Consent Number: SSI 10048

Description of Project: Construction of the Sydney International Speedway

Project Address: Ferrers Road, Eastern Creek

Proponent: Sydney Metro

Title of Audit: Infrastructure Planning Approval compliance

Date: 30 June 2021

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: Larry John Weiss

Signature: LJWeiss

Qualification: Bachelor of Science, Chemical Engineering

Company: QEM Consulting Pty Ltd

Company Address: 3 Erawar Close, Westleigh NSW 2120

Annexure 4: Audit Attendance Register

QEM AUDIT ATTENDANCE REGISTER

AUDITEE: Abergeldie AUDIT: Sydney Speedway - Independent Environmental Audit REFERENCE: SSI-10048 (QEM 1803-024-SMW-IEA)			Site inspection: 30 th March 2021 Project audit: as below	
SITE(s): SIS Works, Eastern Creek			OPENING	EXIT
NAME (print)	POSITION & ORGANIZATION		7 th April	8 th April
Larry Weiss	Independent Environment Auditor	QEM		
Dmitri Khomoutel	Project Director	Abergeldie	—	—
Joseph Maklout	Construction Manager	Abergeldie	"	"
DACP Herson	Superintendent	Abergeldie		
Kelie Pittoway	Environment mgr	Abergeldie	"	
Brandon Johnston	Environmental Coordinator	Abergeldie	"	
Sean Reilly	Engineer	Abergeldie		
Devek Naidu	Project Engineer	Abergeldie	"	
Peter Ryan	Project Engineer	Abergeldie		