

Pre-Construction Minor Works Approval Form

Minor Works are defined as any low impact activities that are undertaken prior to the commencement of ‘construction’ as defined in the project’s applicable planning approval. However if Minor Works affect or potentially affect heritage items, threatened species, populations or endangered ecological communities, these works are defined as ‘construction’ unless otherwise determined by the applicable planning authority.

Minor Works approvals do not remove any obligation to comply with the project’s applicable planning approval conditions (including requirements prior to ‘any works’ commencing) or obtain any other applicable permits, licenses or approvals as necessary.

This application and all supporting information must be submitted to Sydney Metro/the Environmental Representative as one (1) PDF file at least 10 business days prior to the commencement of the proposed Minor Works.

Part 1: Application	
Contractor:	Connect Sydney
Project:	Southwest Metro Interim Cycle Link (ICL)
Application Title: (e.g. Smith St trenching works)	ICL Marrickville to Sydenham
Application Number:	MWA-001 Rev 1
Application Date:	28 August 2024
Planning Approval:	<ul style="list-style-type: none"> Sydney Metro City and Southwest – Sydenham to Bankstown – Environmental Impact Statement (EIS) Sydney Metro City and Southwest – Sydenham to Bankstown – Submissions Report dated September 2018 Sydney Metro City and Southwest Infrastructure Approval SSI-8256 dated December 2018. Sydney Metro City and Southwest Infrastructure Approval SSI-8256 (Mod 1) dated October 2020. Sydney Metro Planning Approval Consistency Assessment - Temporary Active Transport Corridor between Sydenham and Marrickville dated May 2024
Minor Works Categories: <ul style="list-style-type: none"> Highlight as applicable. If Items 4, 8 or 11 are applicable, this form must be endorsed by an Environmental Representative. 	<ol style="list-style-type: none"> Survey, survey facilitation and investigations works (including road and building dilapidation survey works, drilling and excavation). Treatment of contaminated sites. Establishment of ancillary facilities (excluding demolition), including construction of ancillary facility access roads and providing facility utilities. Operation of ancillary facilities that have minimal impact on the environment and community. Minor clearing and relocation of vegetation (including native). Installation of mitigation measures, including erosion and sediment controls, temporary exclusion fencing for sensitive areas and acoustic treatments. Property acquisition adjustment works, including installation of property fencing and utility relocation and adjustments to properties. Utility relocation and connections. Maintenance of existing buildings and structures. Archaeological testing under the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010) or archaeological monitoring undertaken in association with other Minor Works to ensure there is no impact on heritage items.

	<p>11. Any other activities that have minimal environmental impact, including construction of minor access roads, temporary relocation of pedestrian and cycle paths and the provision of property access.</p>
<p>Planning Authority Determination: Will the proposed works affect or have the potential to affect heritage items, threatened species, populations or endangered ecological communities?</p>	<p>No. there will be no impacts associated with the minor works that will affect State or Local Heritage listed items, areas of known or expected archaeological potential, threatened species, populations or endangered ecological communities.</p>

Part 2: Details

Describe the proposed Minor Works:

Including work methodologies, site location(s) and site description(s) (e.g. landscape type, waterways, etc.).

Background

Condition E53 of Sydney Metro’s Southwest Line Infrastructure Approval SSI 8256 requires Sydney Metro prepare a *Walking and Cycling Strategy* to identify opportunities to connect stations with surrounding communities, by connecting to or enhancing existing pedestrian and cyclist paths. Sydney Metro is currently designing a, ‘*East West Pedestrian and Cycling Link*’ which forms part of this strategy.

The final conversion of the T3 Bankstown Line (Sydney Metro’s Southwest Line) commences late September this year, where busses will replace trains between Sydenham and Bankstown Station for approximately 12 months. Rail replacement busses, changes in rail services, and active transport improvements are managed under the Sydney Metro ‘*Temporary Transport Plan*’ (TTP).

Earlier this year Transport Minister Jo Haylen requested that by the commencement of the TTP, Sydney Metro implements an active transport link between Marrickville and Sydenham stations. The Interim Cycle Link (ICL) Sydenham to Marrickville was designed in response to this request.

Overview

The ICL between Sydenham and Marrickville stations is needed to provide the local community with an additional travel option to connect directly to services at Sydenham Station, either by bicycle or other means of active transport. This initiative seeks to alleviate the demand on rail replacement buses and mitigate congestion in and around Sydenham Station during the final conversion of the T3 Bankstown Line to Sydney Metro.

The ICL between Sydenham and Marrickville has synergies with the east west pedestrian and cyclist facilities to be delivered by Sydney Metro in line with SSI 8256 Condition E53. Certain segments of the ICL Sydenham to Marrickville will be retained on a permanent basis, where-as others will be replaced with alternative routes implemented as future works.



Figure 1: Proposed Interim Cycleway Route

Note: Works will not be undertaken from Station St (Marrickville Station) to Riverdale Ave (works previously undertaken by previous station contractor, refer to Figure 2).

Location of Works

The project location falls within the Inner West Council LGA along the following roads and footpaths and is divided into five different sections (Figure 1):

- Existing footpath adjacent to the rail corridor between Victoria Road and Riverdale Ave (Section 1)
- Victoria Road (Section 2)
- Meeks Road (Section 3)
- Marrickville Road (Section 4)
- Lower Railway Parade (Section 5)



Figure 2. Location of proposed works from Riverdale Ave, Marrickville to Sydenham Station

Scope of Works

The scope of the proposed works at each location:

Section 1 - Upgrading and re-opening the existing pedestrian path which runs parallel to the rail corridor.

- Construction of new asphalt pedestrian footpath with timber edges.
- Colourbond fencing.
- New signage.
- Temporary solar lighting.

Section 2 - Implementation of a pedestrian refuge crossing on Victoria Rd and other on-road traffic calming features.

- New kerb and gutter.
- Median pedestrian/cyclist refuge island with cyclist holding rails.
- New kerb ramps.
- New speed bumps.
- New signage and pavement markings to reflect changed traffic conditions.

Section 3 - New separated cycleway and on-road traffic calming features.

- Creating new bi-directional cycleway with green cycleway warning paint and bike lane separators.
- New line and pavement markings to reflect changed traffic conditions.
- New signage.

Section 4 - Existing footpath to be rehabilitated and converted into an appropriate shared pedestrian/cyclist path, along with on-road traffic calming features.

- Replace sections of concrete footpath to create a safe and appropriate pedestrian/cyclist shared path.
- Concrete road pavement repair
- Restore concrete crossings/driveways for businesses.
- Install pinned concrete kerb and concrete infill blister island.
- New bicycle holding rail.
- New kerb ramps.
- New line and pavement markings.
- New signage.

Section 5 – Existing footpath to be repaired and converted into a shared path for pedestrians and cyclists.

- Replace sections of concrete footpath.
- Restore concrete crossings/driveways for businesses.

- New line and pavement markings.
- Minor landscaping and tree trimming with new plants to be installed in existing garden beds.
- Installation of two temporary solar lights.

Noise and Vibration

The full noise results can be viewed in the report attached as Appendix 5.

Measures to reduce noise generated by the project include:

- The intensity of the concrete saw would be reduced to intervals of 5 minutes per 15 minutes
- Concrete cutting and any noisy works would cease at 11pm to reduce noise impacts to surrounding receivers. This is opposed to ceasing at 10pm due to constraints on the Project imposed by ROL commencing at 9pm. This allows a duration of 2 hours for essential noisy works to occur.
- Noise blankets (attached to ATF fencing) would be implemented to screen surrounding receivers and therefore, reduce noise exposure by 5 dBA
- Any equipment not in use for extended periods shall be switched off and not be left idling
- Attended noise monitoring would be undertaken by Connect Sydney Environmental Advisors when noisy works are scheduled as per Table 2 of Appendix 5 to verify that noise levels resulting from works are in accordance with the levels predicted in the noise assessment report in Appendix 5.
- Pre commencement induction will be undertaken by site personnel to identify the Construction Noise and Vibration Strategy and relevant project specific and standard noise and vibration mitigation measures.
- Prestart meetings/ commencement meetings will be undertaken on-site prior to the commencement of work.
- Workers are not to shout, slam doors, drop objects or make any other unnecessary noise.
- Handheld and vehicle mounted radios will be at a suitable level to maintain safety but minimise audible impacts to surrounding areas.
- No vehicles are to be left idling when construction personnel arrive at the worksite.
- Workers are to be mindful of local residents when leaving and entering the site.
- No deliveries to site will be required for this Project.

Plant and Equipment

Plant and equipment that will be used as part of this Project include:

- Generator
- Lighting towers
- Noise barriers
- Temporary fencing and water filled barriers.
- Asphalt paver
- 2m wide rotary mill (profiler)
- 5T excavator with hammer attachment
- 8T Steel drum roller
- Multi Roller
- Concrete saw
- Concrete truck
- Skid steer with mill attachment
- Work trucks, dump trucks and material delivery trucks
- Traffic control equipment
- Line marking equipment
- Core drill
- Service location equipment
- Hand tools

Traffic and Parking

This project includes temporary relocation of pedestrian paths and road shoulder closures for the duration of the works. Traffic and pedestrian routes will be generally managed and maintained through the following:

- All pedestrian path relocations and temporary road shoulder closures will be managed in accordance with TGS (Refer to Appendix 2)'.
- Road shoulder closure: If road shoulder closures are necessary, traffic will be diverted using clearly marked detour routes and temporary signage to guide drivers
- Pedestrian safety: If footpaths are required to be closed during works, temporary pedestrian detours will be put in place to safely navigate pedestrians around works areas. This will include using temporary signage and instructions for pedestrians as per TGS.
- Temporary Parking Restrictions: Car parking may be temporarily restricted during works at each location. Affected residents and businesses will be notified in advance of temporary parking closures. Permanent changes to car parking arrangements are not proposed.
- Public Transport Routes: Public transport routes will not be impacted by these works. Bus routes and stops adjacent to Sydenham Station and on Marrickville Road will not be impacted by these works.
- Work Scheduling: Works would be scheduled to cause the least impacts to traffic and pedestrians, including at night. Businesses and residents would be notified of the times of works and potential noise disruptions. Out of hours works will reduce impacts on pedestrians and traffic and will reduce access impacts for businesses that are operating throughout the day.

Ancillary Facilities and Laydown Areas

No ancillary facilities or laydown areas are required for this project. Plant and equipment required for each shift would be loaded on to trucks at the Connect Sydney depot and driven to site. Stockpiling is not proposed as part of this project. All plant and equipment will then be returned to Connect Sydney depot at the end of each shift.

Erosion and Sediment Controls

In locations where patching or repairing of sections of concrete paths or road pavement would occur, sediment controls will be implemented in accordance with the Environmental Control Map in Appendix 1. Stormwater drains downflow of any works will be appropriately protected from potential sediment run off. Dust will be managed by implementing controls, such as wetting concrete or halting work on particularly windy conditions.

Utilities

Utility investigations have been conducted and depths and locations have been physically marked in the work area and confirmed. There will be no impact to utilities during the proposed works. No utilities conflict with the proposed ICL design, therefore conditions E69 through E72 have not been triggered for this Project.

Tree Trimming

Further investigations are to be carried out regarding any required locations for the project footprint in which the pruning of branches may need to be carried out. Tree trimming may be included as part of this minor works application. Any trees to be trimmed as part of this application must be done so in accordance with E4 and E5 of SSI 8256. A tree report will be prepared and submitted to the ER for review and Sydney Metro for submission to the Department of Planning (for information only).

Hours of Works

The Project will be carried out of a period of 4 weeks with an anticipated commencement date of 2 September 2024. Due to community impacts and access issues, road shoulder and pedestrian pavement closures and safety, works will be undertaken out of hours. Work may take place during standard construction hours where feasible and if parking changes allow and adjacent business impacts are considered.

All work undertaken outside of standard working hours would be managed under an endorsed Out of Hours Works Application and in accordance with the Sydney Metro City & Southwest Out of Hours Work Protocol with appropriate noise mitigation measures implemented.

<p>Planned Commencement Date:</p>	<p>The works will commence on Monday 2 September 2024.</p>
<p>Local Sensitivities: Describe the presence (if any) of local sensitive environmental areas and community receptors</p>	<p>The site consists of approximately 1.4km of rail corridor, public roads and footpaths between Riverdale Ave, Marrickville and Sydenham Station and is in close proximity to residential, commercial and light industrial properties. There are no waterways near the proposed works. The nearest waterway is the Cooks River over 850 metres away.</p> <p>Section 1: Riverdale Ave to Victoria Road Works will be undertaken within the rail corridor (zoned SP2 Rail Infrastructure) to develop a new active transport path (asphalt pedestrian footpath with timber edges) approximately 70m in length. The T3 Bankstown line is located immediately to the north of the site. The site abuts No. 21 Riverdale Ave to the south. The western extent of the site is approximately 65m east of Marrickville State Heritage Register curtilage. There are no local environmentally sensitive areas in this section.</p> <p>Section 2: Victoria Road Works will be undertaken on Victoria Road (to Meeks Rd). This section of the site is approximately 180m in length and is entirely located within SP2 Rail Infrastructure zoned land. The closest residential receivers are located 10m to the south and 30m to the north from the site. A local heritage item (Stone House on 1 Myrtle St I1270) is located adjacent to the site to the south. Works are outside of the curtilage of this heritage item. There are no other local environmentally sensitive area in this section.</p> <p>Section 3: Meeks Road This section of the site is approximately 417m in length and stretches from the intersections of Victoria Road and Meeks Road to the south and Marrickville and Meeks Road to the north. This section largely consists of single-story dwellings, the rail corridor and a small reserve to the south and light industrial buildings facing Marrickville Road to the north. There are no heritage items or environmentally sensitive areas in this section.</p> <p>Section 4: Marrickville Road The section of the site is approximately 405m in length and extends from Meeks Road to the west to Lower Railway Parade to the east. This section is made up of commercial and light industrial buildings. The site is adjacent to a local heritage item, Brick retaining wall on Marrickville Road (eastern end) I1261 and are within the item's curtilage. However, these works are limited to path marking, signage and minor pavement repairs that are separated from the retaining wall by approximately 13m. The works crew would be toolboxed on the heritage structure to ensure no impacts to it. There are no other environmentally sensitive areas in this section.</p> <p>Section 5: Lower Railway Parade The section of the site is approximately 306m in length and extends from Marrickville Road to the south to Sydenham Metro Station to the north. This section is made up of various commercial and light industrial buildings. The site is adjacent to a local heritage item, Brick retaining wall on Lower Railway Parade I1261 and are within the item's curtilage. The heritage structure itself is 16 metres from the proposed works. These works are limited to path marking, signage and minor pavement repairs. The works crew will be toolboxed on this heritage item to ensure there are no impacts. The site is located adjacent to a State Heritage Listed Item being Sydenham Station. Works are not proposed within this curtilage. There are no other environmentally sensitive areas in this section.</p>

Part 3: Environmental Risk Assessment and Management

Prepare an Environmental Risk Assessment (in accordance with the [Sydney Metro Risk Management Standard](#)) and an Environmental Control Map for the proposed Minor Works and attach as Appendix 1.

If an Environmental Risk Assessment and/or an Environmental Control Map for the proposed Minor Works is/are already contained in existing documentation, attach the relevant section(s) as Appendix 1.

<p>Documentation: List any existing documents (including those referenced above) that the proposed Minor Works will be undertaken in</p>	<p>Maps showing the local sensitivities discussed in Part 2, and mitigation measures developed as part of the environmental risk assessment will be provided to all works contractors to ensure impacts are avoided.</p> <p>Works will also be undertaken in accordance with the:</p> <ul style="list-style-type: none"> • Sydney Metro Unexpected Heritage Finds Procedure
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accordance with and attach as Appendix 2 (e.g. plans, procedures, procedures, etc.).	<ul style="list-style-type: none"> • Sydney Metro Overarching Community Communications Strategy • Sydney Metro Construction Complaints Management System • Sydney Metro Incident and Non-compliance Procedure • Sydney Metro Out of Hours Works Strategy/Protocol • Sydney Metro Community notifications provided in Appendix 3 and any future notifications as required
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Part 4: Workforce Notification

How will the environmental and community risks and associated mitigation measures of the proposed Minor Works be communicated to the contractor's workforce?	Environment and community risk will be mitigated via toolbox talks, site inductions, and environmental alerts. All works will be undertaken in accordance with the relevant safe work method process applicable to the project.
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Part 5: Community Consultation

What community consultation has been undertaken already?	Initial community notification was undertaken in May 2024.
What community consultation is planned to be undertaken?	Community notification took place on the 21 st of August via letterbox drops. Additional flyers will be going out requesting vehicles and other personal materials/items within the project scope be removed at least 48 hours prior to works commencing, as required by the Sydney Metro Overarching Community Communications Strategy (OCCS). In accordance with the Sydney Metro OCCS, 7 days notification has been given to the community prior to works starting.
If drafted already, attach applicable Community Notification as Appendix 3.	

Part 6: Contact Details

Nominate contractor's project manager, environmental and communications contact(s).					
Name:	Brad Dentice	Position:	Project Manager	Phone:	0460 966 741
	Linda Abdelgader		Communications Manager		0405 037 137
	Keegan Flowerday		Environment Advisor		0411 367 597

Part 7: Signature

This signature acknowledges that the proposed Minor Works will be undertaken in accordance with this application, have minimal environmental impact and are not defined as 'construction' in accordance with the applicable planning approval.			
Name:	Keegan Flowerday		
Signature:		Date:	14/08/2024

Determination Page

(Sydney Metro/Environmental Representative Use Only)

12. Endorsement/Approval

These signatures represent formal endorsement/approval for the proposed Minor Works to commence in accordance with this application and the applicable planning approval requirements (subject to any determination from the applicable planning authority as may be required by the planning approval conditions).

	Director Project Communications – Endorsement (required for all applications)	Director Environment, Sustainability & Planning – Approval (required for all applications)	Environmental Representative – Endorsement (required as necessary in accordance with the applicable planning approval, optional for all other circumstances)
Signature:			
Name:	Neil Dix	Fil Cerone	Maulik Bapodara
Date:	29/8/2024	29/8/24	29/08/2024
Comments:		<p>Updated on 5/9/24 with ER agreement. Amendment to MWA to extend work hours to include standard construction hours where feasible and if parking changes allow and adjacent business impacts are considered.</p> <p>Conditions:</p> <p>Connect Sydney to send through site set up photos to Sydney Metro and ER on the first shift for works at Lower Railway Parade (Section 5) and the first shift works at Meeks Road and Victoria Road to ensure sites are set up in accordance with relevant ECMs at commencement of these works.</p>	<p>Conditions:</p> <ul style="list-style-type: none"> - Prior to pruning of vegetation/trees, Connect Sydney to prepare a tree report and submit to ER for review followed by submission to DPHI via SM. - Connect Sydney to undertake noise monitoring at the affected sensitive residential receivers and submit monitoring results to the ER and SM. - Please note that ER site inspection(s) will be undertaken during these works to check compliance with this MWA, date and time to be advised.
Conditions:			Supporting letter attached as Appendix 4 if necessary.
<input checked="" type="checkbox"/>	Approved (by Sydney Metro)		
<input checked="" type="checkbox"/>	Endorsed (by Environmental Representative)		
<input type="checkbox"/>	Rejected		



Appendix 1: Cover Page

Environmental Risk Assessment and Environmental Control Map.



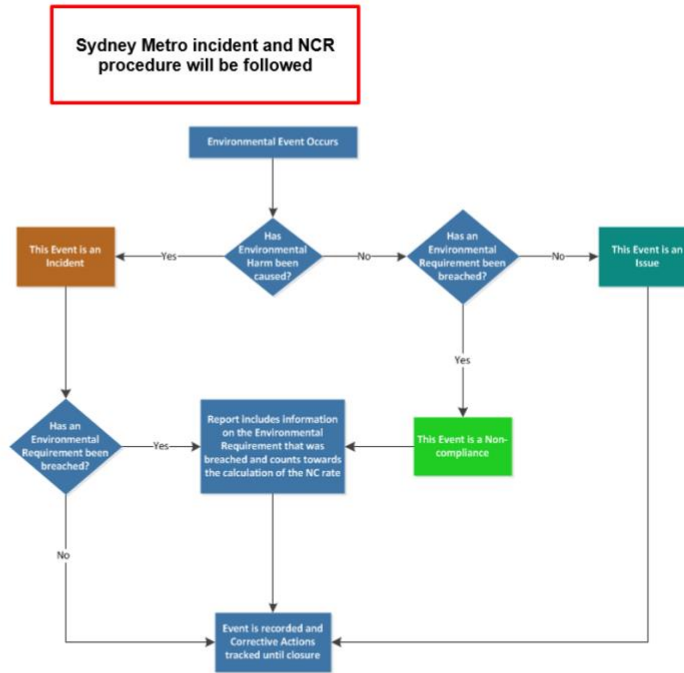
Environmental Control Map

Project Contacts		
Project Title	Name	Contact Number
Project Manager	Brad Dentice	0460 966 741
Communications Manager	Linda Abdelqader	0405 037 137
Environmental Advisor	Keegan Flowerday	0411 367 597
Environmental Manager	Larry Melnick	0474 371 640

Heritage Management	
Controls and Management	Responsibility
Location of known heritage items and areas will be communicated to all site workers prior to work commencement.	Project Manager Site Engineer Environmental Manager
In the event potential heritage items are encountered STOP WORK and implement the Sydney Metro Unexpected Heritage Finds Procedure. SM to be notified as soon as possible	
Noise and Vibration Management	
Controls and Management	Responsibility
Implementation of noise management mitigation measures: <ul style="list-style-type: none"> Noise blankets to be set up between work activity and nearest sensitive receivers No shouting No speakers or radios Plant to be switched off when unused Use of noisy equipment to adhere to agreed respite periods where applicable. Implement required mitigation measures as per the approved OOHWA 	Project Manager Site Engineer Environmental Manager
All noisy works to cease by 11pm	

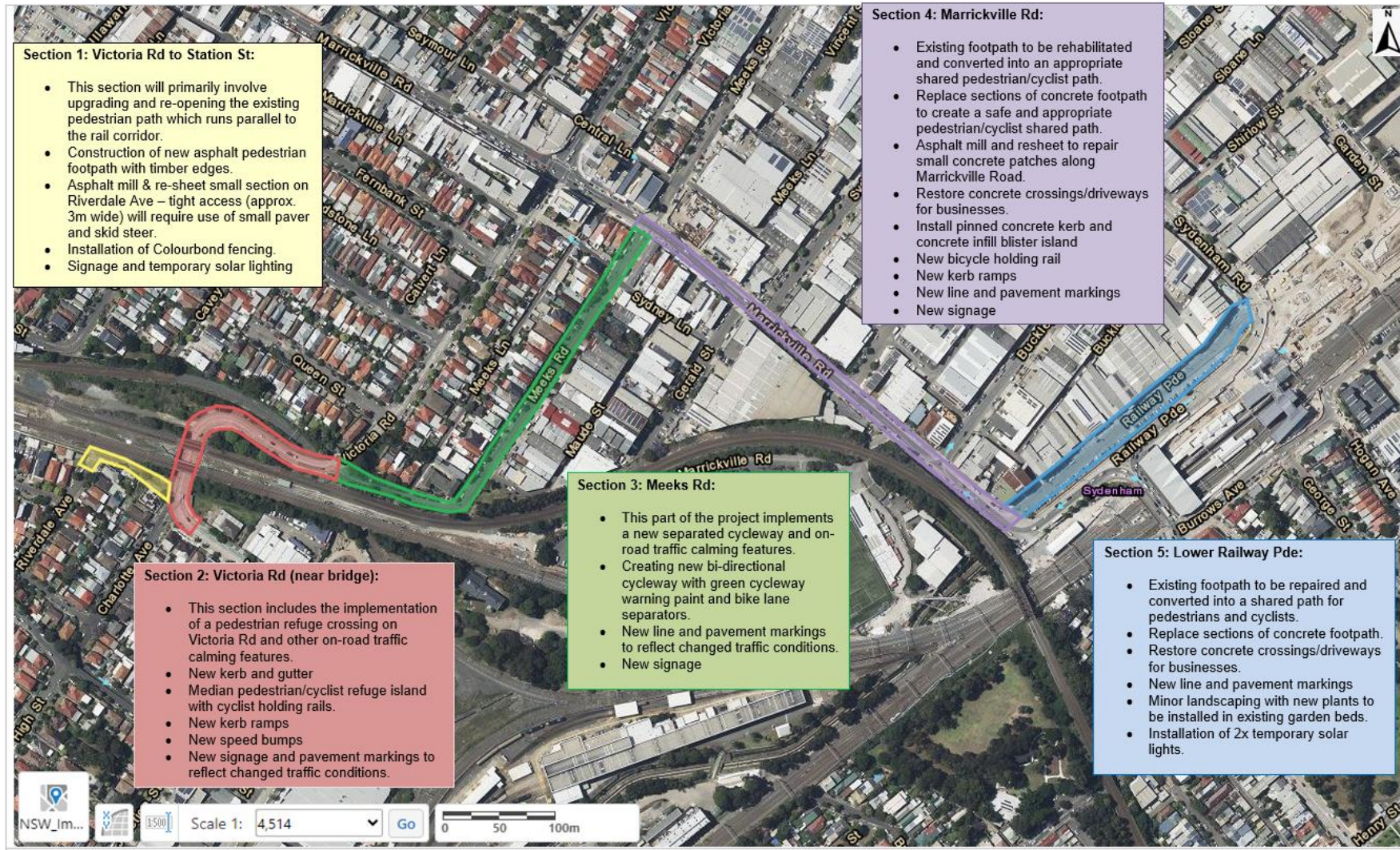
Air Quality Management	
Controls and Management	Responsibility
Visual observation of dust emissions will trigger dust suppression mitigation strategies, including wetting of the excavation area	Site Supervisor
Dust producing works to cease in particularly windy conditions	Site Supervisor
Soil and Water Management	
Controls and Management	Responsibility
Stormwater drains must be protected with coir logs or geofabric as per the specific ECM	Site Supervisor Environmental Manager Project Manager
Roads and footpaths would be kept clean (via sweeping or other methods that do not generate a run-off risk) with any tracked mud or dirt removed throughout the works, and prior to ceasing works	Site Supervisor
All slurry to be removed immediately and not washed off onto the pavement or road.	Site Supervisor
All loose material to be swept up, and not washed into the environment.	Site Supervisor
Implement erosion and sediment controls as per Erosion and Sediment Control Measures at drains identified in ECMs	Site Supervisor
No stockpiling of any excavated material on site.	Project Engineer Environmental Manager
All loose material to be placed directly onto trailers/ute to be disposed at the end of each working shift.	Project Engineer Environmental Manager
Storage of Liquids	
Controls / Actions	Responsibility
Spill kits and absorbent material to be located in plant and vehicles.	Site Supervisor Project Manager
Biodiversity	
Controls and Management	Responsibility
If encountered leave Fauna alone and contact Supervisor, Environmental Manager and Project Leader.	All Personnel
No Vegetation to be trimmed or removed without appropriate approval.	Site Supervisor
There will be no clearing of vegetation unless approved.	Site Supervisor Project Manager

Environmental Incident Management Process

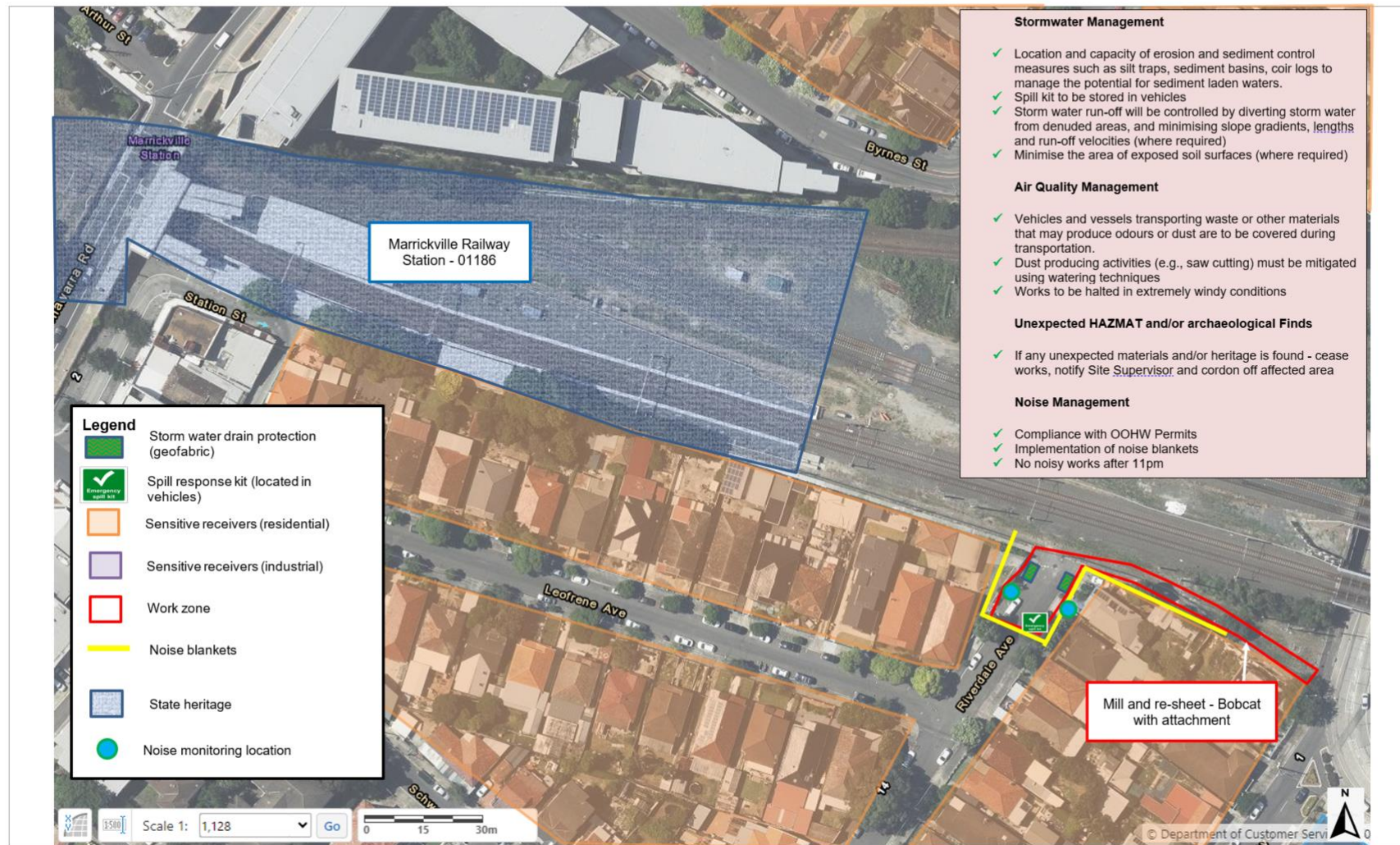


Waste and Resource Management	
Controls and Management	Responsibility
No stockpiling of material on site. No waste to be left on site	Site Supervisor
All waste removed from site and disposed of at licensed facilities at the end of each shift	Site Supervisor Project Manager
No contaminated waste expected.	Project Manager Site Engineer Environmental Manager
Waste from excavation is stockpiled for testing and disposal in accordance with the Waste Classification Guidelines.	Site Supervisor
Spill containment/control kits are available and stocked.	Site Supervisor Project Manager
All waste generated to be disposed according to their waste classification (recyclables, general waste etc)	Site Supervisor Project Manager

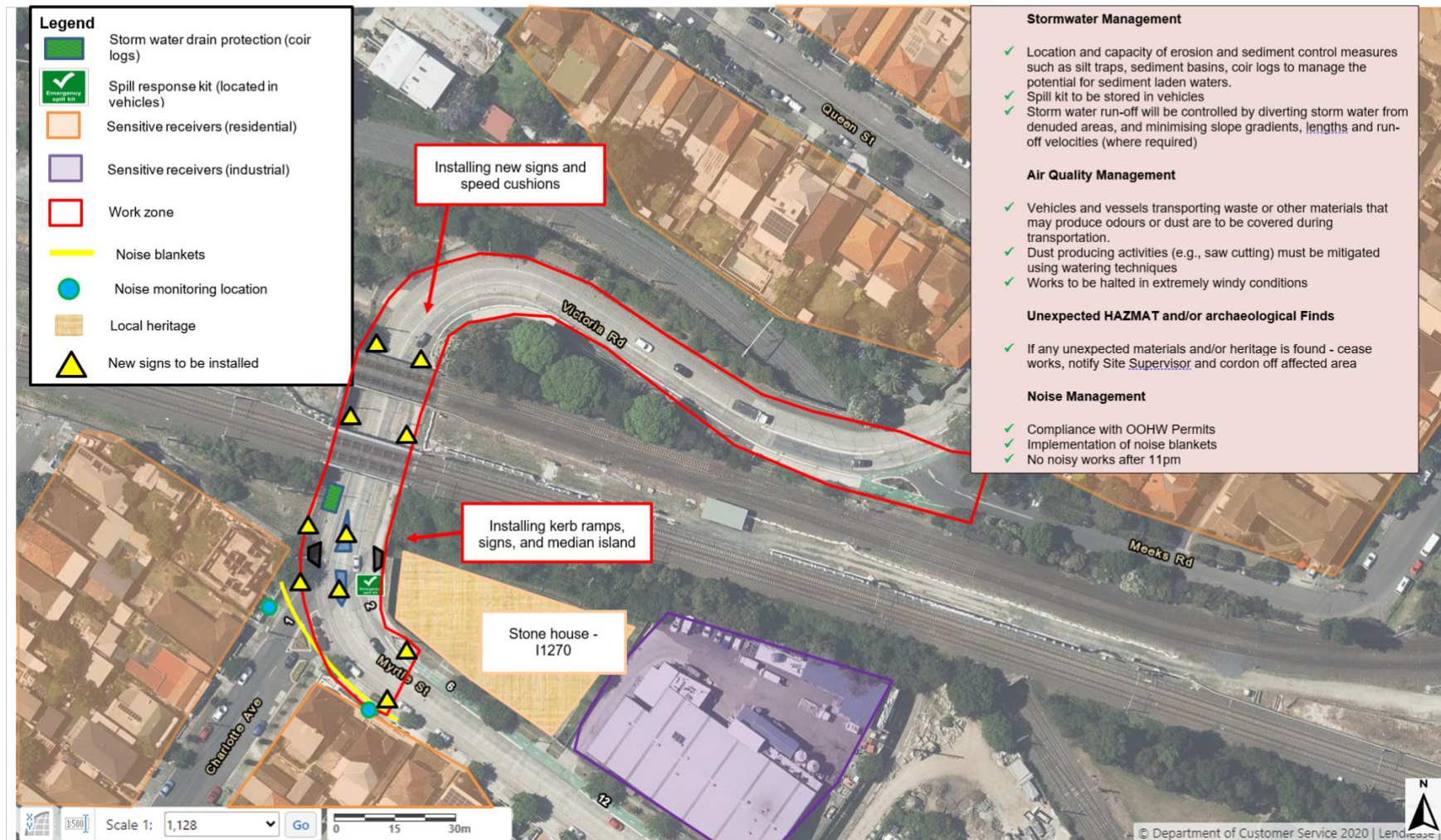
ENVIRONMENTAL CONTROL MAP – INTERIM CYCLE LINK (WORKS OVERVIEW)



ENVIRONMENTAL CONTROL MAP – SECTION 1



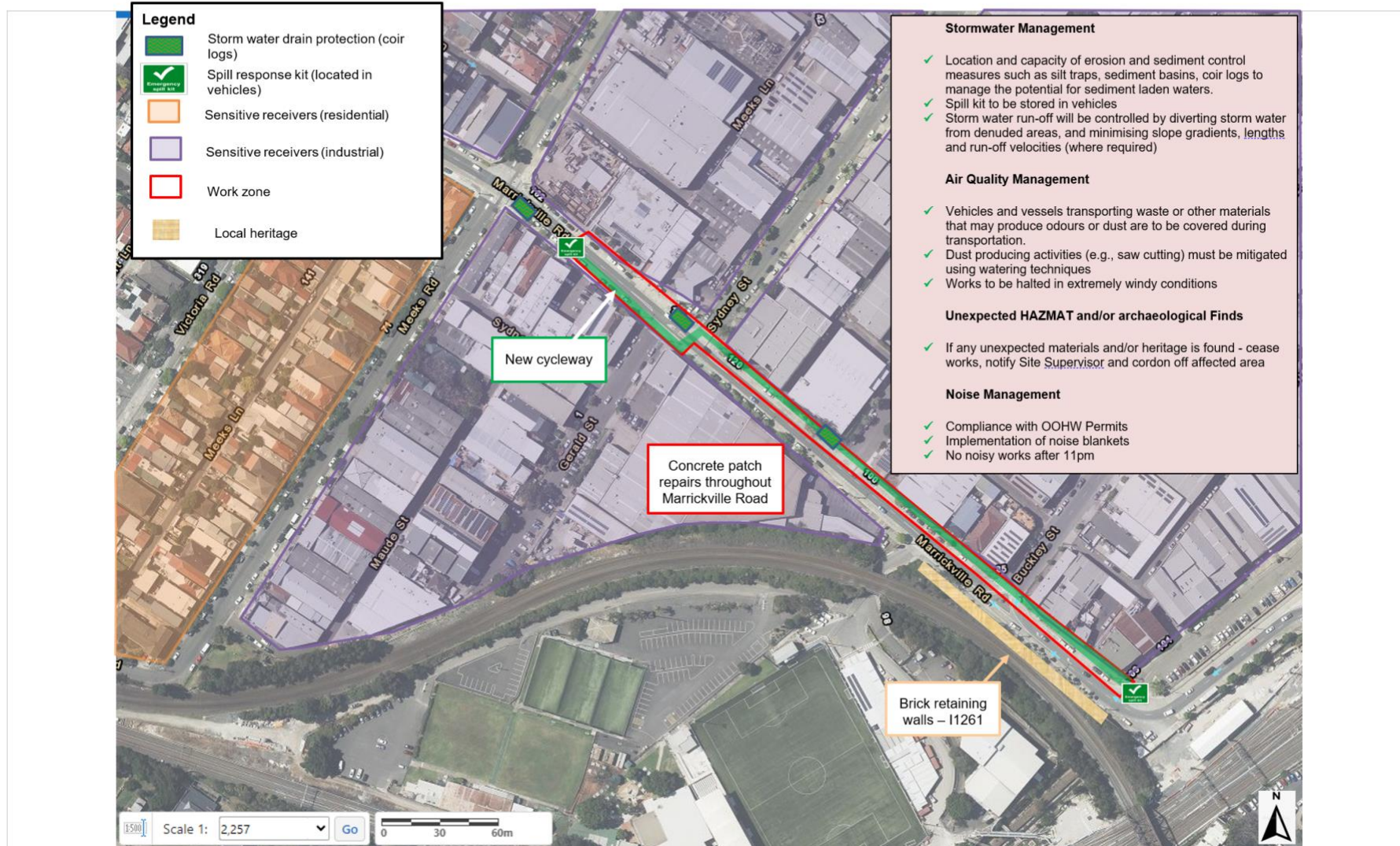
ENVIRONMENTAL CONTROL MAP – SECTION 2



ENVIRONMENTAL CONTROL MAP – SECTION 3



ENVIRONMENTAL CONTROL MAP – SECTION 4



ENVIRONMENTAL CONTROL MAP – SECTION 5

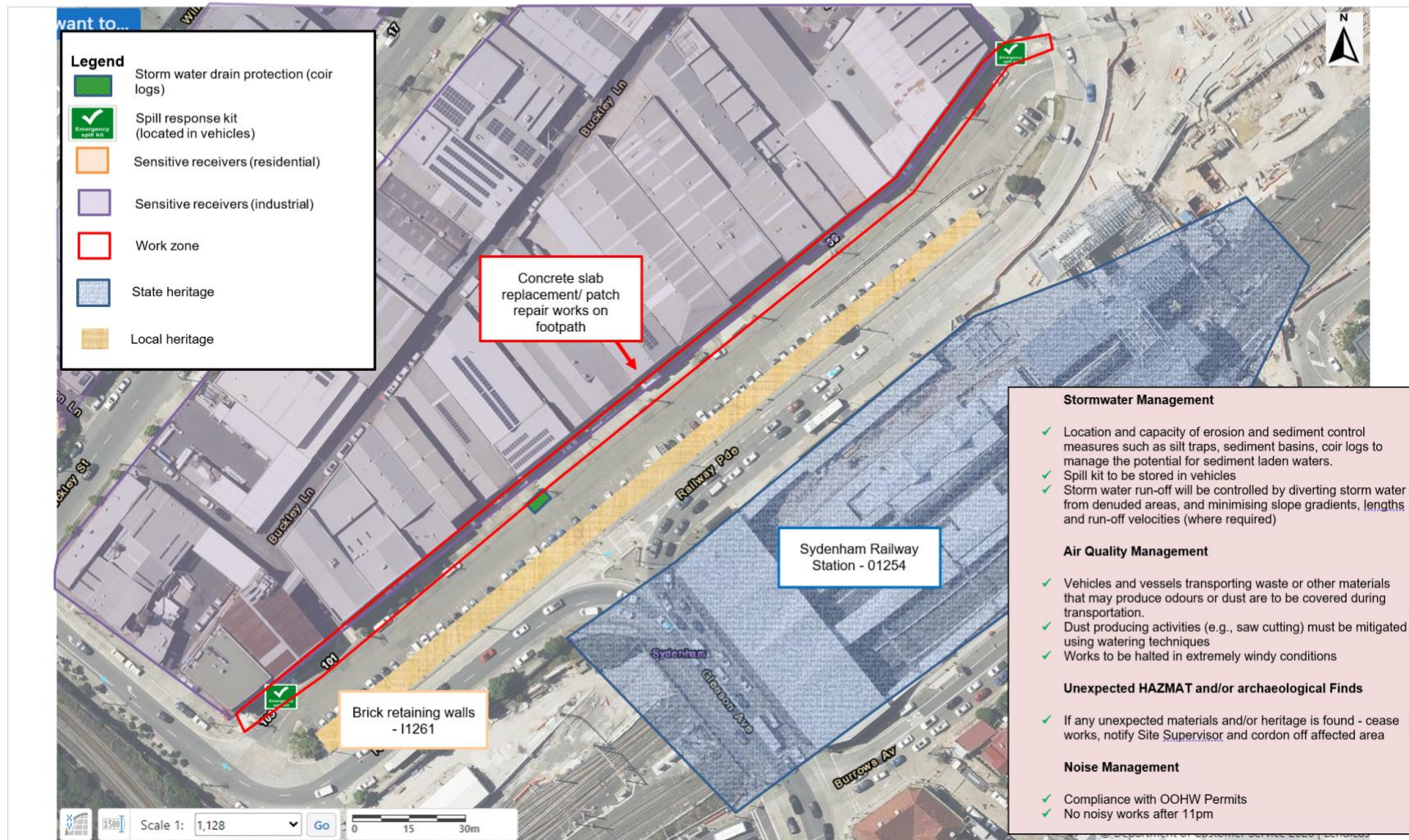


Table 1: Environmental Risk Assessment

Aspect	Potential environmental impact	Initial risk rating		Risk	Control measures	Residual risk rating		Risk	Management of Residual Risk
		L	C			L	C		
Vibration	Use of jackhammers could cause a perceptible vibration impact to individuals adjacent to the works. No potential to exceed the cosmetic or structural damage criteria to buildings adjacent to the works.	L5	C5	4	Limit the use of the Jackhammer - Jack hammer will only be used when necessary. Manual hand tools such as a crowbar and shovel will be used in place of a jackhammer when the substrate being excavated is not overly compacted. Follow the appropriate approval process and submit OOHW applications for Environmental Representative approval.	L5	C5	4	Respite periods to be adhered to Ensure plant and equipment is switched off when unused Regulate worker behaviour – no shouting or making loud noises. Toolboxing of staff prior to works beginning
Noise	Use of equipment such as Vac Truck, jack hammer and wacker packer has the potential to be annoying to the public. Worker behaviour could also increase noise impacts. OOHW could cause sleep disturbance and have unacceptable impacts on the community	L2	C4	23	Noise blankets to be set up between work activity and nearest sensitive receivers No shouting No speakers or radios Plant to be switched off when unused Use of jackhammer and concrete saw to adhere to agreed respite periods Follow the appropriate approval process and submit OOHW applications for Environmental Representative approval. Implement required mitigation measures as per the OOHWA	L3	C3	12	Noisy works must be limited to before 11pm due to ROL conditions . Toolboxing of staff prior to works beginning
Water Quality, Erosion and Sediment ation	Runoff of mud or dirt into the local stormwater system due to tracking of site vehicles. Potential for escape of contaminated materials	L4	C5	7	Sandbags to be placed downhill to protect any nearby drains Small areas of site to be excavated and to be made good at the end of each shift. Roads and footpaths would be kept clean (via sweeping or other methods that do not generate a run-off risk) with any	L5	C5	4	Minimise dust generation wherever possible. Reduce excessive use of water for dust suppression and concrete sawing.

	<p>causing local contamination.</p> <p>Excavation of material and removal of tiles could also impose a dusk risk</p>				<p>tracked mud or dirt removed throughout the works, and prior to ceasing works.</p> <p>All slurry to be removed immediately and not washed off onto the pavement or road.</p> <p>All loose material to be swept up, and not washed into the environment.</p> <p>No stockpiling of any excavated material on site.</p> <p>All loose material and unusable pavers to be placed directly onto trailers/ute to be disposed at the end of each working shift.</p> <p>Visual observation of dust emissions will trigger dust suppression mitigation strategies, including wetting of the excavation area</p> <p>Mud will be cleaned from wheels/tracks before plant/equipment/vehicles leave site to minimise mud tracking</p>				<p>Toolboxing of staff prior to works beginning.</p>
Waste	<p>Improper management of waste could result in an environmental incident.</p> <p>Any litter generated from site activities can potentially be blown into the surrounding environment.</p>	L4	C5	7	<p>No stockpiling of material on site.</p> <p>All excavated material/unusable pavers will be placed directly onto utes/trailers for disposal offsite. No waste to be left on site.</p> <p>All waste generated to be disposed according to their waste classification (recyclables, general waste etc).</p> <p>No contaminated waste expected.</p> <p>Waste from excavation is stockpiled for testing and disposal in accordance with the Waste Classification Guidelines.</p> <p>Spill containment/control kits are available and stocked.</p>	L5	C5	4	<p>Toolboxing of staff prior to works beginning.</p>
Contamination	<p>No contamination expected.</p> <p>Potential for oil/fuel spills from plant/equipment</p>	L4	C5	7	<p>Waste to be stored for testing and disposal in accordance with the Waste Classification Guidelines.</p> <p>Spill containment/control kit to be used as required.</p> <p>Ensure spill response kits are fully stocked.</p>	L5	C5	4	<p>Toolboxing of staff prior to works beginning.</p>

Hazardous Materials	No hazardous materials to be used on site.	L4	C5	7	Any fuel or chemical spills to be cleaned using appropriate spill kits and disposed according to their classification.	L5	C5	4	Toolboxing of staff prior to works beginning.
Heritage	No impact to heritage will occur because all invasive works will avoid designated heritage areas.	L5	C4	11	Location of known heritage items and areas will be communicated to all site workers prior to work commencement. In the event potential heritage items are encountered the Sydney Metro Unexpected Heritage Finds	L4	C5	7	Toolboxing of staff prior to works beginning. Photos of the three heritage items (detailed in the above Minor Works Application) will be taken and sent to SM prior to the commencement and at the end of the Project (time and date stamped) to ensure works have not caused damage to the heritage items.
Biodiversity	No impact to biodiversity. Invasive works will avoid designated biodiversity areas. No vegetation will be impacted by the project works.	L4	C5	7	NDD locations have been selected in areas that are not directly adjacent to the critical root zones of trees. Trees that require trimming to be undertaken under supervision of experienced and suitable qualified arborist. There will be no clearing of vegetation unless approved. Any injured fauna encountered must be reported to WIRES and SM. Park vehicles in designated areas only.	L5	C5	4	Toolboxing of staff prior to works beginning.
Air Quality	Potential For wind-blown dust. Emission of GHG.	L4	C5	7	Water will be used to accompany any saw cutting or jackhammering activities to prevent a dust generation risk. Plant will only be on when needed Vehicles and vessels transporting waste or other materials that may produce odours or dust are to be covered during transportation. Visual observation of dust emissions will trigger dust suppression mitigation strategies, including wetting of the excavation area	L5	C5	4	Toolboxing of staff prior to works beginning.
Traffic, Transport and Access	Potential impact to existing traffic and pedestrian movements through	L5	C4	11	Traffic control to be used to divert traffic on roads, and pedestrians on footpaths around works, to minimise impact.	L4	C5	7	Toolboxing of staff prior to works beginning.

	<p>closures of lanes, and footpaths.</p> <p>Negative impact to local roads, parking and footpaths from closures or obstructions during project works.</p>				<p>Access for pedestrians and vehicles to buildings/driveways will be maintained throughout works using traffic controllers and a staged working methodology.</p> <p>Contractors to minimise the number of vehicles used to travel to the site.</p> <p>Road occupancy licences (ROL) and road opening permits (ROP) will be sought from council as required. Controls will be implemented in accordance with the ROL/ROP.</p> <p>Community to be notified of all planned closures.</p> <p>Work on roadways will be undertaken at times to avoid peak traffic flow.</p> <p>Adherence to IWC's protocols for Road Access, including road, footpath, car park occupation, temporary road closure and re-opening, work zones, hoardings and skip bin placement, including submitting timely permit applications</p>				
Visual Amenity	<p>Direct line of sight into site might have a negative visual impact.</p> <p>Work sites being needed for more than one day increase the impact to visual amenity.</p> <p>Windblown rubbish and litter from workers.</p>	L4	C5	7	<p>Staged methodology ensures works can start and finish in a single shift.</p> <p>Temporary fencing with mesh banners to be placed around the works area to limit visibility of site works, and to protect the public/environment from dirt/material that may become airborne during NDD and excavation.</p> <p>Workers to place all rubbish into provided bins.</p>	L5	C5	4	<p>Toolboxing of staff prior to works beginning.</p>
Utilities	<p>Potential to impact utilities/services during the excavation process</p>	L5	C4	11	<p>Utilities and services are first located to prevent any direct impact in the process of excavating or NDDing.</p> <p>Non-destructive Digging methodology is being used to expose utilities and services, thereby avoiding any impact to the operation of the utilities.</p>	L4	C5	7	<p>Toolboxing of staff prior to works beginning.</p> <p>Appropriate time be provided to personnel locating services to ensure a more accurate outcome.</p>

Sydney Metro Consequence Criteria

	ENTERPRISE RISK CONSEQUENCES					
	C6 Insignificant	C5 Minor	C4 Moderate	C3 Major	C2 Severe	C1 Catastrophic
Environment	No appreciable changes to environment and/or highly localized event.	Change from normal conditions within environmental regulatory limits & environmental effects are within site boundaries.	Short-term and/or well-contained environmental effects. Minor remedial actions probably required.	Impacts external ecosystem & considerable remediation is required.	Long-term environmental impairment in neighbouring or valued ecosystems. Extensive remediation required.	Irreversible large-scale environmental impact with loss of valued ecosystems.

Sydney Metro Likelihood Criteria and Risk Matrix

Probability	One off event How likely?	Frequency	Repeated How often?	Likelihood	Consequences						
					C6	C5	C4	C3	C2	C1	
					Insignificant	Minor	Moderate	Major	Severe	Catastrophic Transformational for opportunities	
	Expected to occur frequently during time of activity or project. Greater than a 90% chance of occurring.		10 times or more every year	Almost certain	L1	20	22	29	32	34	36
	Expected to occur occasionally during time of activity or project. A 75-90% chance of occurring.		1-10 times every year	Very Likely	L2	14	18	23	28	31	35
	More likely to occur than not occur during time of activity or project. A 50-75% chance of occurring.		Once each year	Likely	L3	9	12	16	24	27	33
	More likely not to occur than occur during time of activity or project. A 25-50% chance of occurring.		Once every 1 to 10 years	Unlikely	L4	6	7	11	17	25	30
	Not expected to occur during the time of activity or project. A 10-25% chance of occurring.		Once every 10 to 100 years	Very Unlikely	L5	3	4	8	13	19	26
	Not expected to ever occur during time of activity or project. Less than 10% chance of occurring.		Less than once every 100 years	Almost Unprecedented	L6	1	2	5	10	15	21

Figure 1: Sydney Metro Consequence Criteria and Risk Matrix

Appendix 2: Cover Page

Environmental Management Documentation.



Environmental Incident and Non-compliance Reporting Procedure

SM-17-00000096

Metro Body of Knowledge (MBoK)

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1. Purpose and scope

This procedure documents the process to be used when classifying and reporting Environmental Events.

This procedure applies to Sydney Metro and any contractor Sydney Metro engages to carry out works. Principal Contractors must ensure their processes for managing Environmental Events is consistent with this document. The requirement for consistency is documented in the Construction Environmental Management Framework (Section 3.3(f)) and shall be allocated as a contractual requirement to each delivery partner.

2. Introduction

Sydney Metro is committed to minimising risks to the environment, the rapid identification and rectification of breaches to Environmental Requirements and efficient and effective responses to Environmental Incidents that grows our ability to minimise harm and prevent future re-occurrences.

This procedure defines an approach to classifying Environmental Issues, Incidents and Non-compliances and establishes the immediate, interim and long term actions that are taken in response to Environmental Events.

3. Definitions

All terminology in this Procedure is taken to mean the generally accepted or dictionary definition with the following exceptions:

Term	Definition
Environment	means components of the earth, including: a) land, air and water, and b) any layer of the atmosphere, and c) any organic or inorganic matter and any living organism, and d) human-made or modified structures and areas, and includes interacting natural ecosystems that include components referred to in (a)-(c).
Environmental Event	An occurrence that identifies actual or potential environmental impacts or non-compliances. Events can include conversations, inspections, incidents, or failures of process.
Environmental Harm	Includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.
Environmental Incident	An occurrence or set of circumstances, as a consequence of which pollution (air, water, noise, and land) or an adverse environmental impact has occurred or is likely to have occurred.
Environmental Issue	An occurrence or set of circumstances where Environmental Harm or Non-compliance could occur if not rectified.
Environmental Non-compliance	A breach of an Environmental Requirement originating from Planning Approvals, Environment Protection Licenses, lease agreements, and other requirements documented in environmental management plans.

Term	Definition
Material Harm to the Environment	<p>harm to the environment is material if:</p> <ul style="list-style-type: none"> a) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or b) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and c) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment. <p>It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.</p>

Terms and jargon specific to this procedure are defined within [SM-17-00000203 Sydney Metro Glossary](#).

4. Accountabilities

The Executive Director, Safety, Sustainability & Environment is accountable for this Procedure. Accountability includes authorising the document, monitoring its effectiveness and performing a formal document review.

Direct Reports to the Chief Executive are accountable for ensuring the requirements of this document are implemented within their area of responsibility.

The Direct Reports to the Chief Executive who are accountable for specific projects/programs are accountable for ensuring associated contractors comply with the requirements of this document if specified in the relevant contracts.

5. Environmental Events

Environmental surveillance data is relied upon to inform Sydney Metro of performance trends, to provide assurance that legislative requirements are being met and indicate where surveillance activities should be directed. In order to rely upon environmental data for this purpose there needs to be a high degree of consistency in the manner by which it is collected and interpreted. Due to the need for consistency, any incident/Non-compliance procedure produced by a delivery partner to Sydney Metro is required to be consistent with the requirements of this document.

The concept of Environmental Events forms a common starting point for understanding what types of occurrences should be managed and reported as Incidents and what should be reported as Non-compliances or Issues. When an Environmental Event occurs a series of questions can be asked to consistently determine what type of event it is. Commonly, Environmental Events lead to three different processes:

1. Reporting of an Environmental Incident;
2. Reporting of an Environmental Non-compliance; or
3. Reporting of an Environmental Issue.

Incidents and Non-compliances are recorded using [SM-17-00000105 Environmental Incident and Non-compliance Notification Report Form](#) and Environmental Issues are recorded through environmental inspection reports using [SM-17-00000107 Environmental Inspection Report Template](#). These paper based records are subsequently entered into the Sydney Metro Compliance Register (Section 6.7) which is used to disseminate the data and facilities reporting internally and externally. Note where a Principal Contractor has submitted alternative processes and these have been approved by Sydney Metro they may also be used.

The figure below shows the process by which Environmental Events are classified (Figure 1).

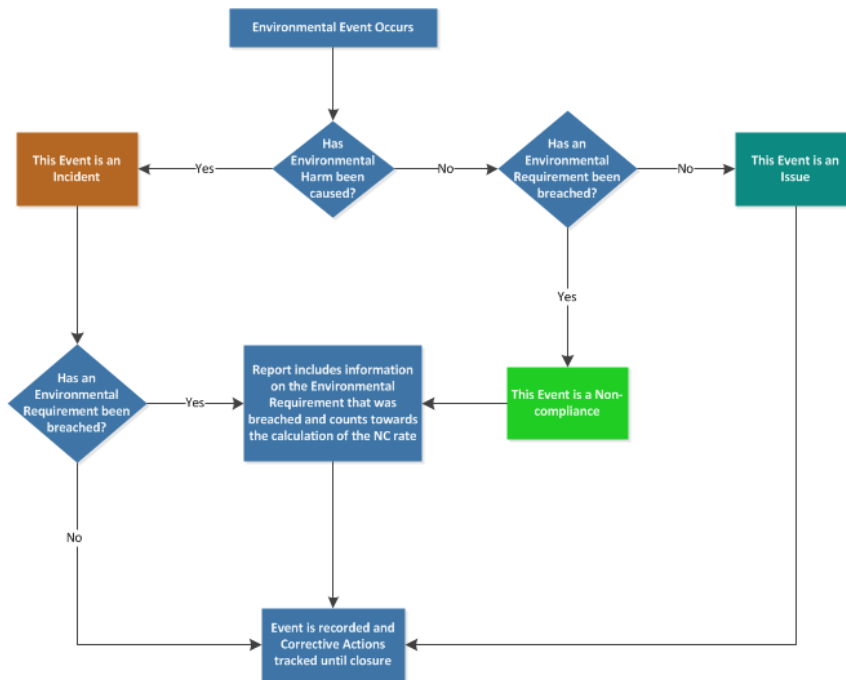


Figure 1: Environmental Event Classification Process

Where Environmental Harm has been caused the event will always be classified as an Environmental Incident regardless of whether one or more Environmental Requirements have been breached. Only when an event occurs without harm being caused to the environment will it be classified as a Non-compliance or Issue. It should be noted that the Incident management process still captures any breaches of Environmental Requirements and these incidents contribute towards the calculation of the NC Rate (Section 7.1).

This flowchart above is intended to be a guide and there may be situations where it is unclear exactly how an Environmental Event should be classified. In these situations a judgement call should be made in consultation with your Manager.

5.1. Worked Example – Classifying Environmental Events

This Section provides a fictitious example of Environmental Events which fall into each of the three different categories. The situations outlined below are provided to explain how event classifications are made. The background for these worked examples is as follows:

Sydney Metro is carrying out works in a newly established site and substantial earthworks are occurring to construct piers for an elevated viaduct. A nearby creek contains a variety of important fish species and the local community are known to use this creek for recreational fishing. The Environmental Impact Statement identified the creek as being at risk of increased sedimentation from dirty water run-off and the Conditions of Approval include a requirement to have a Progressive Erosion and Sediment Control Plan in place. This plan has been produced and indicates that sediment fences must be in place at specific locations to capture dirty water run-off. Regular daily inspections of the sediment controls are carried out by the contractor's Environment Manager and an Independent Environmental Representative has commenced a monthly inspection on this site at 7 am on Thursday morning.

5.1.1. Soil and Water Issue

The Environmental Representative notices a sediment fence has been knocked over in one of the areas indicated as requiring fencing on the ERSED plan. It appears to have occurred recently and there is no record of rainfall in the last few days. During the course of the inspection all other ERSED controls appeared to be in good condition and erected in accordance with the requirements of the Blue Book. In this example no harm has yet been caused and no environmental requirement has been breached so the event is classified as an Environmental Issue which is raised on the inspection report with an action to reinstall the fence.

5.1.2. Soil and Water Non-compliance

Alternatively, the Environmental Representative might have noticed many sediment fences had been knocked down and in some areas an absence of sediment fences where the plan indicates they are required. Despite there being no rain in recent days the Environmental Representative concludes that the requirements of the plan are not being followed and have been breached. The event is raised as non-compliance and actions are set in place to re-enforce the requirements of the ERSED plan for that sites workforce as well as the immediate reinstatement of controls.

5.1.3. Soil and Water Incident

Finally, in a third scenario the Environmental Representative notices many sediment fences are down and some are absent where required by the plan. However, significant rainfall has occurred in recent days and the Environmental Representative determines that it is likely dirty water has escaped through the area into the nearby creek potentially causing harm to the fish population. This event is classified as an Incident by the inspector and immediate notification is undertaken. Similar controls are implemented as described above.

5.2. Notifiable Events

There are a number of Acts and regulations that include a specific requirement to notify a Regulatory Authority. When an Environmental Event triggers one of these notification requirements we then also refer to that event as a Notifiable Event (Table 1).

The Principal Contractor’s Environment Manager must determine whether an event is notifiable, and may rely upon advice from Sydney Metro if it is provided.

Table 1: Examples of Notifiable Events

Event type	Legislation		Trigger for Notification
Pollution Incident ¹	POEO Act 1997	Part 5.7	Where Material Harm has occurred contact the EPA Pollution Line as soon as practicable
	POEO (General) Regulation 2009	Section 101	
Land contamination	Contaminated Land Management Act 1997	Section 60(1)	As soon as practicable, after becoming aware of contamination that exceeds the relevant investigation levels in the National Environment Protection Measure, where a person has or will be exposed to the contamination
Discovery of an Aboriginal relic	National Parks & Wildlife Act 1974	Section 89A	Director General of EPA in writing within a reasonable time after becoming aware. Note this is not required for Projects approved under Part 5.2 of the Environmental Planning and Assessment Act (see section 115ZG). Notification and reporting is addressed in the relevant Infrastructure Approval
Discover Aboriginal Remains	Commonwealth Aboriginal & Torres Strait Islanders Heritage Protection Act 1984	Section 20	Commonwealth Minister of the Environment in writing as soon as practicable after becoming aware
Discovery of a relic	Heritage Act 1977	Section 146	Heritage Council in writing within a reasonable time after becoming aware Note -this is not required for Projects approved under Part 5.2 of the Environmental Planning and Assessment Act (see section 115ZG). Notification and reporting is addressed in Infrastructure Approvals

5.3. Event Types

Each Environmental Event is assigned a secondary classification of an Event Type for the purpose of data analysis and general environmental management. They are grouped by areas of environmental management so that targeted auditing, training or awareness initiatives can be initiated in response to emergent trends. Each Event Type is explained in Table 2.

¹ Further information on reporting pollution incidents to EPA is provided in Section 6.6 Environmental Incident/Non-compliance Report

Table 2: Environmental Event Types and their descriptions

Event Type	Applies To:			Description
	Issue	Incident	Non-compliance	
Soil and Water	●	●	●	Covers the physical location, chemical composition and ecology of soils and waterways. Any event which changes these compositions is a Soil and Water event. Within this event type all instances of contamination, erosion and sedimentation of waterways is covered.
Flora and Fauna	●	●	●	Covers vegetation and vegetation communities as well as animals and animal habitat. Any event where vegetation is felled or damaged, animals are killed or injured, or habitat is harmed or destroyed is covered.
Waste and Spoil	●	●	●	Covers the management of Excavated Natural Material (ENM) and Virgin Excavated Natural Material (VENM) including on-site management, and disposal and also the classification and management of Waste materials. Note: that the transportation of spoil is covered under Traffic, Transport and Access.
Heritage	●	●	●	Covers the management of known heritage artefacts or sites, and the treatment of unexpected finds, archaeological investigations and other impacts.
Air Quality	●	●	●	Covers the management of emissions of particulate matter, odours, and gasses used as air quality parameters from worksites.
Noise and Vibration	●	●	●	Covers the management of airborne and ground borne noise and vibration and includes hold points on the commencement of any work where Out of Hours Works permits or Construction Noise Impact Statements are required.
Community Stakeholder and Business	●	●	●	Covers the management of Community and Stakeholder requirements and includes complaint response procedure, community management protocols, and the maintenance of information on websites.
Traffic Transport and Access	●	●	●	Covers the management of traffic inside and outside of sites including access points and parking requirements. This event type also covers any requirements in relation to vehicles and vehicle maintenance or the transportation of waste and spoil.
Spills and Leaks	●	●	●	Covers all instances where environmentally sensitive substances are held within a container which has the potential to leak or spill and covers pipes, hoses, fuel tanks, storage tanks and plastic containers. Note: Spills and Leaks specifically exclude anything in relation to the transport and deposition of sedimentation.
Management Systems	●	●	●	Covers procedural or administrative processes that are common across all areas. It specifically does not cover procedural or administrative processes which are unique to any of the other event types. For example, not completing a vegetation removal form prior to vegetation clearing is still a Flora and Fauna event. Note: A good example of a Management Systems NC would be not reporting an Environmental Incident within required timeframes.

6. Environmental Incident Classification and Management

Sydney Metro has defined an Environmental Incident as:

An occurrence or set of circumstances, as a consequence of which pollution (air, water, noise, and land) or an adverse environmental impact has occurred or is likely to have occurred.

Adverse environmental impact includes contamination, harm to flora and fauna (either individual species or communities), damage to heritage items, or adverse community impacts.

Planning Approvals and Environment Protection Licences permit some environmental impacts and these are not intended to be captured as Environmental Incidents.

Table 3: Examples of Environmental Incidents

Type	Example Incident
Air Quality	Odour that travels beyond the site boundary
Air Quality	Dust exceeding reasonable levels without active management measures in place
Air Quality	Operation or maintenance of plant in a manner that causes or has likely caused excessive air pollution
Soil and Water	Discharge of water on or off site in a manner that causes or has likely caused water pollution without required approvals.
Noise and Vibration	Noise that travels beyond the site boundary as a result of poorly maintained plant or operation of plant in an inefficient manner
Noise and Vibration	Failure to comply with the approved hours of work
Soil and Water	Where the chemical composition of soil or water has been detrimentally modified by a contaminant leading to potential or actual environmental harm. For example, rainfall causes a flow of water across a site that erodes soil and enters a waterway increasing the total suspended solids of that water body.
Spills and Leaks	Where a substance has leaked from, or spilt from a container that is designed to prevent that substance from escaping into the environment (including bunds, fuels tanks, chemical bottles and other containers). Spills and Leaks specifically exclude anything in relation to the transport and deposition of sedimentation.
Soil and Water	Dispose of waste in a manner that harms or is likely to harm the environment
Flora and Fauna	Harm or "pick" a threatened species, endangered population or endangered ecological community without required approvals
Flora and Fauna	Damage to vegetation, fauna or habitat including watercourses without required approvals
Heritage	Damage, disturbance, destruction or works to heritage items/relics without required approvals
Heritage	Damage, disturbance, or destruction of Aboriginal objects or places without required approvals

6.1. Incident Classification

Environmental Incidents are classified into one of three Classes that are based upon the consequence descriptors for environmental risks in the Sydney Metro Risk Matrix (refer to [SM-17-00000182 Risk Management Standard](#)). Each of these classifications trigger a variety of management actions and/or legislative requirements depending on the severity of the consequence described where Class 3 represents minor consequences and Class 1 represents major consequences.

This matrix is further sub-divided into consequence ratings ranging from C6 (low impact) to C1 (high impact). An incident transitions between a Class 3 to a Class 2 incident once material harm has been caused, and transitions into a Class 1 incident once it is determined that the Environmental Harm caused is large-scale and cannot be remediated (Table 4).

Table 4: Classification System for Environmental Incidents

Class 3			Class 2		Class 1
C6	C5	C4	C3	C2	C1
No appreciable changes to environment and/or highly localised event	Change from normal conditions within environmental regulatory limits and environmental effects are within site boundaries	Short-term and/or well-contained environmental effects. Minor remedial actions probably required	Impacts external ecosystem and considerable remediation is required	Long-term environmental impairment in neighbouring or valued ecosystems Extensive remediation required	Irreversible large-scale environmental impact with loss of valued ecosystems

6.1.1. Class 3 Incidents

These Incidents are events which cause Environmental Harm, but do not cause Material Harm to the environment. Normally Class 3 Incidents are not Notifiable Events and therefore a simple notification protocol is adopted whereby Sydney Metro must be notified within 48 hours verbally, and in writing.

In some cases it will be unclear whether Material Harm has been caused in the early stages of Incident Management. If this is the case then the process for Class 2 Incidents is followed (see Section [Class 2 Incidents](#)) until it is clear that Material Harm has not been caused.

A formal Incident Investigation report is not required for Class 3 Incidents, however, it is expected that the person responsible for completing the Incident Notification Report makes appropriate enquiries to determine the likely causal factors involved and assigns effective corrective actions.

6.1.2. Class 2 Incidents

These Incidents are events which cause Material Harm to the environment and they always trigger notification of Regulatory Authorities. These Incidents represent events that are far more serious than Class 3 Incidents and therefore strict communication protocols are required to ensure that effective and informed decisions are made (Figure 2).

The Environmental Lead, contract Environment Manager and the Independent Environmental Representative must be notified verbally as soon as possible after the observer becomes aware of a Class 2 Incident.

Class 2 Incidents must be investigated and the investigation must produce an investigation report containing corrective or preventative actions. This investigation report must be provided to Sydney Metro within 7 days of the event unless another timeframe is agreed with the EL.

Despite any arrangements for the submission of investigation reports, an Incident Notification Report must be provided with all available information and submitted to Sydney Metro within 48 hours. It is not expected that initial Incident Notification Reports for Incidents under investigation initially include actions as these will be informed by the findings of the investigation. The report should be updated with actions resulting from the investigation when available.

6.1.3. Class 1 Incidents

Class 1 Environmental Incidents are managed in the same manner as Class 2 Incidents expect where a determination is made by the Chief Executive (or delegate) that a Crisis Management Team should be activated. In this situation [SM-19-00053243 Crisis Management Procedure](#) is followed.

6.2. Incident Notification

When an Environmental Event occurs which causes Environmental Harm in all cases both verbal and written communication of the incident must be carried out immediately and within 48 hours respectively. For Class 1 and 2 Incidents the notification process shown in Figure 2 must be followed. Written communication of Environmental Incidents is via an Incident Notification Report (Section 6.3).

This process includes specific roles and responsibilities within Sydney Metro and our delivery Partners who are required to take notification actions in response to Incidents.

This notification process has been developed to ensure that crucial information about Incidents is captured early and communicated to specific individuals who can ensure the Environmental Impacts are minimised and efficient and effective responses to the event are implemented.

In particular the Principals Representative and the Environmental Lead for Sydney Metro play a crucial role in the communication of Incidents within Sydney Metro and these roles are explained in more detail below.

6.2.1. Principal's Representative (PR)

Each works package establishes a contractual interface for communication between the contracted party and Sydney Metro. Generally this interface is between the Principal Contractors Project Director and an appointed representative of Sydney Metro called the Principals Representative.

All formal written communications must pass between these two individuals electronically using TeamBinder. The Principals Representative holds certain responsibilities in the Incident management Process outlined in Figure 2.

6.2.2. Environmental Lead (EL)

Where this procedure is applied to a works package an Environmental Lead (EL) will be selected for the relevant works package. The Environmental Lead must possess environmental experience and competency in managing Incidents and be a representative of Sydney Metro for those works. This representative holds specific responsibilities outlined in Figure 2.

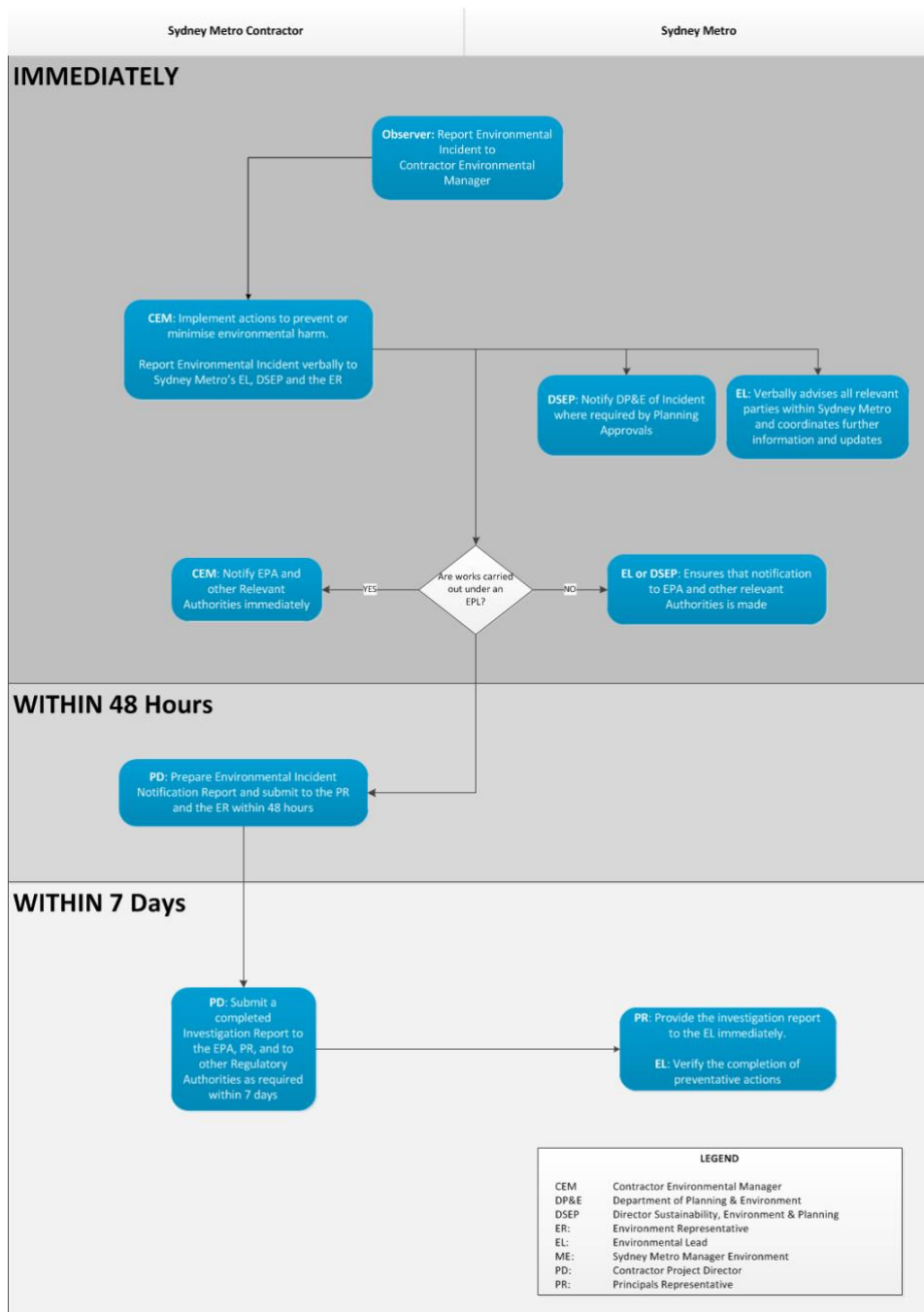


Figure 2: Environment Incident notification process for Class 1 and 2 Incidents

6.3. Incident Notification Reports

For all Incidents an Incident Notification Report must be completed and submitted to Sydney Metro within 48 hours. These reports satisfy the requirement for written communication to Sydney Metro and are completed using [SM-17-0000105 Environmental Incident and Non-compliance Notification Report Form](#) or a similar and consistent form approved by Sydney Metro.

6.4. Incident Investigations

Environmental Incident Investigations must be carried out for all Class 1 and Class 2 Incidents. Investigations may also be requested for any other Environmental Event at the discretion of Sydney Metro. This discretion is likely to be exercised where incidents of a similar nature are occurring repetitively.

When conducting an Environmental Incident investigation, they must:

- Be led by a lead investigator who is suitably independent investigator capable of arriving at objective findings and is experienced in conducting environmental incident investigations;
- Consider the need for legal privilege during the investigation process in consultation with legal counsel;
- Be informed by all available information that is relevant to the investigation;
- Analyse the timeline of events which led up to and followed the occurrence of Environmental Harm including the immediate incident response;
- Be conducted in a manner that is consistent with recognised investigation techniques such as ICAMS;
- Gather and record evidence;
- Seek the input of key stakeholders; and
- Identify Preventative and Corrective actions and document these in the Incident Notification Report.

6.5. Environmental Incidents with Health and Safety Impacts

It is possible that where an Event occurs that causes Environmental Harm, harm is also caused to the health, safety or wellbeing of people. In these situations there will also be a Health and Safety Incident process undertaken which is separate to the process outlined in this document.

While the definition of the Environment covers people under the POEO Act, the management of impacts upon them are carried out using the Health and Safety Incident Management protocols. This is because Health, Safety and Wellbeing requirements are governed by a range of legislation other than the POEO Act and this procedure is not comprehensive in that regard. Sydney Metro has well established processes to manage impacts on people without the need for the Environmental Incident Process to intervene.

Furthermore, where Environmental Events cause harm to both the 'environment' and people it is possible that the root causes for the respective impacts are different. It is also possible that differences in the severity of the impacts trigger inconsistent notification requirements and investigation levels. It is prudent to identify appropriate and effective corrective actions that reduce the risk of impacts to both people and the environment, therefore separate Incident Management Processes are undertaken in these situations.

For more detail on the management of Health and Safety Incidents please refer to [SM-17-0000040 Health & Safety Incident Reporting & Investigation Standard](#).

6.6. Reporting Pollution Incidents to Relevant Authorities

If an Incident or Non-compliance is a Notifiable Event, then a report must be provided to the relevant Regulatory Authority within the timeframe(s) specified by the relevant legislation. Pollution Incidents which are causing or threatening Material Harm to the environment must be reported to each of the following authorities immediately after project personnel become aware of the Incident, as required by Section 148 of the POEO Act 1997. The contact numbers for these authorities are listed in Table 5.

Table 5: Contact details for Relevant Authorities

Type	Example incident
EPA Environment Line	131 555
Local Authority	Local Council (specific to area)
Ministry of Health	Public Health Unit (refer to http://www.health.nsw.gov.au/Pages/default.aspx to confirm local area contact details)
SafeWork NSW	131 050 or contact@safework.nsw.gov.au
Fire and Rescue NSW	000

Relevant information required to be given to EPA when making a notification is specified in Section 150 of the POEO Act 1997 as follows:

- Time, date, nature, duration and location of the incident;
- Location of the place where pollution is occurring or is likely to occur;
- Nature, the estimated quantity or volume and the concentration of any pollutants involved;
- Circumstances in which the Incident occurred (including the cause of the Incident, if known);
- Action taken or proposed to be taken to deal with the Incident and any resulting pollution or threatened pollution; and
- Other information prescribed by the regulations.

All relevant information known at the time of making the notification must be reported. If the information required by (c), (d) or (e) above is not known at the time of initial notification but becomes known afterwards, it must be reported to each authority immediately after it becomes known. Verbal notification must be followed by notification in writing within seven days of the date on which the Incident occurred.

Pollution Incidents are not required to be reported if the Incident has already come to the attention of the EPA or the Incident involves only the emission of an odour.

Failure to report a pollution Incident as required by the POEO Act 1997 is an offence.

Where any work or activity is regulated by an Environment Protection License (EPL), notification of a pollution Incident to the EPA should be made by the licensee. Thus, where the contractor holds the EPL for the project, notification to EPA shall be made by the contractor.

For any work or activity that is not regulated by an EPL, notification of pollution Incidents to EPA shall be made by Sydney Metro, unless the contractor is instructed otherwise by Sydney Metro. This includes pollution Incidents that occur as a result of pre-construction activities which may be undertaken prior to an EPL being required for a project. Pre-construction activities are determined by the Planning Approval and may include, for example, geotechnical investigations or surveys.

Where the Environmental Representative determines there to have been a significant off-site impact on people or the biophysical environment, the program Director Sustainability Environment and Planning will notify the Secretary of the Department of Environment and Planning within 48 hours in accordance with Project Infrastructure Approval Conditions. This notification will be followed by a full written report within seven days of the date on which the incident occurred.

6.6.1. Maritime Related Incident Notification and Reporting

Marine Incidents involving vessels and personnel on board vessels must be reported to the Australian Maritime Safety Authority in accordance with the guidance published on their website at:

- [Australian Maritime Safety Authority Incident Reporting](#); and
- [Reporting obligations of owners and masters of domestic commercial vessels](#).

6.7. Environmental Compliance Register

The Environmental Compliance Register is used to manage the information associated with reporting of Environmental Events. This register is maintained by the Manager Environment and may be used by a variety of individuals to input data. For access to the register or information on its use contact the Manager Environment.

This register analyses the data it contains and produces environmental compliance statistics that are used to meet a range of reporting and environmental management requirements.

7. Environmental Non-compliance

An Environmental Non-compliance is a breach of an Environmental Requirement originating from Planning Approvals, Environment Protection Licenses, lease agreements, and other requirements documented in environmental management plans. It is important to note that regardless of whether an event is classified as a Non-compliance or an Incident the process behind managing the event remains the same, with the following exceptions:

- Non-compliances are not notifiable to Regulatory Authorities under the POEO Act;
- Non-compliances are reported to have occurred on the day the breach was raised as opposed to the date when the requirement was breached (this is to preserve historical reporting and analysis – see Section 7.1);
- Non-compliances are not divided into severity classes (Section 5.2);
- Non-compliances do not have the potential to trigger crisis or emergency management processes; and
- There is an informal notification process in the immediate timeframe following a Non-compliance being raised.

When an Environmental Event occurs that causes Environmental Harm and also breaches one or more Environmental Requirements, then an Incident Notification Report will be created which records what requirements were breached.

If a Non-compliance is identified then it must be raised using [SM-17-00000105 Environmental Incident and Non-compliance Notification Report Form](#) within 48 hours by the party responsible for the breach.

7.1. Non-compliance Rate

A key environmental performance statistic used by Sydney Metro is the Non-compliance Rate. This statistic provides a standardised way of comparing the performance of different projects or contractors. The NC Rate is calculated using the following formula:

$$= \left(\frac{NCs + Incidents\ with\ breaches\ raised\ in\ month + (Open\ NCs + Open\ Incidents\ with\ breaches\ from\ previous\ months)}{Total\ Number\ of\ Ongoing\ Requirements} \right) \times 100$$

Each month a count of the number of NCs raised, and Incident raised where Environmental Requirements have also been breached is counted. Added to this number is the number of these events which were raised in previous months that still held an Open status in the current reporting period. Non-compliance and incident Events are considered Open if any of the associated Actions are Open. The total is divided by the number of Environmental Requirements which are actively being complied with (Ongoing Requirements) and a multiplying factor of 100 is applied.

8. Corrective and Preventative Actions

Whenever an Environmental Event is raised actions will be assigned to the event irrespective of whether it is an Issue, Incident or Non-compliance. These actions will generally be Corrective Actions which are implemented to eliminate the cause of the Incident, Non-compliance or Issue and can be thought of as reactive measures in response to the Environmental Event.

Preventative Actions may also be assigned to prevent the occurrence of an Incident, Non-compliance or Issue and can be considered pro-active measures which may be recommended following a detailed investigation of the event.

Actions must:

- Limit impacts as far as is reasonably practicable;
- Eliminate risk where practicable;
- Where it is not practicable to eliminate the risk, follow the hierarchy of controls;
- Address root causes and contributing factors; and
- Be prioritised based on risk.

The Executive Director, Safety Sustainability & Environment must ensure there are systems in place to:

- Monitor corrective action status;
- Escalate issues to the executive where progress on a corrective action is inadequate; and
- Retain all corrective action responses for recording purposes.

8.1. Action Status

Actions are allocated to a person who will take accountability for ensuring it is carried out within a timely manner and completed by the due date.

Actions are either closed immediately if the Action has already been carried out and verified by Sydney Metro, or are created with an open status. The Action will remain in an open state until such a time as Sydney Metro verifies that the responsible person has completed the Action in a satisfactory manner. Until all actions associated with an Incident, Non-compliance or Issue are closed the original Environmental Event is considered to be open as well. This is relevant when calculating the NC Rate as open Non-compliances and Incidents contribute toward the calculation of this statistic.

Verification is determined by the Environmental Lead by sighting evidence of the Actions implementation.

9. Related documents and references

Related documents and references

- [SM-17-0000022 Environmental & Sustainability Management Manual](#)
- [SM-17-0000182 Risk Management Standard](#)
- [SM-17-0000040 Health & Safety Incident Reporting & Investigation Standard](#)
- [SM-19-00053243 Crisis Management Procedure](#)
- [SM-17-0000105 Environmental Incident and Non-compliance Notification Report Form](#)
- [SM-17-0000107 Environmental Inspection Report Template](#)
- [SM-17-0000203 Sydney Metro Glossary](#)

10. Superseded documents

Superseded documents

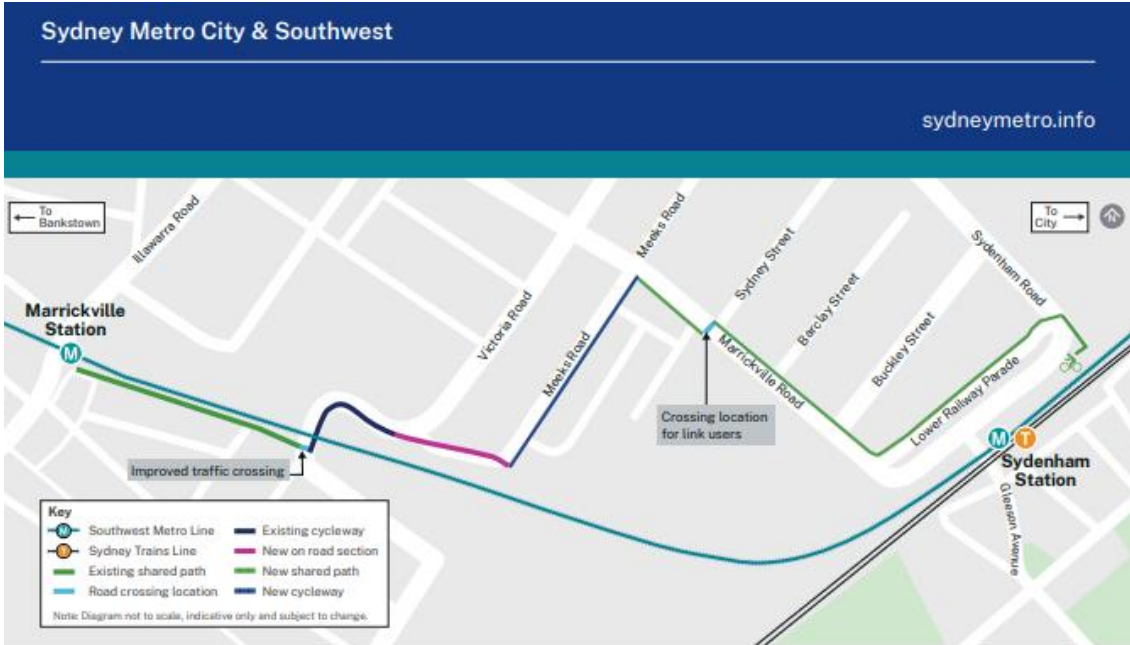
There are no documents superseded as a result of this document.

11. Document history

Version	Date of approval	Notes
1.0	31 March 2015	New document
2.0	7 July 2016	IMS Review
3.0	7 April 2017	IMS Review
4.0	23 November 2018	IMS Review
5.0	11 February 2019	IMS Review
5.1	18 February 2019	Minor correction to formula

Appendix 3: Cover Page

Community Notification.



Proposed route for the cycle link between Marrickville Station and Sydenham Station.

Interim cycle link between Marrickville Station and Sydenham Station

Sydney Metro is delivering an interim cycle link ahead of the T3 Line final Metro conversion shutdown.

What is being delivered?

Sydney Metro will deliver an interim cycle link between Marrickville Station and Sydenham Station for the community to use during the final Metro conversion shutdown of the T3 Bankstown Line.

This interim cycle link will be opened before the final conversion shutdown of up to 12 months, starting between July and October 2024.

The route for the link will use existing shared paths and cycleways that are adjacent to the rail corridor, as well as some new paths and on road sections to be constructed.

Southwest Link

The NSW Government has announced Southwest Link, a dedicated, high frequency bus service between Sydenham and Bankstown train stations to ensure passengers can continue to travel during the final Metro conversion of the T3 Bankstown Line.

Southwest Link will form part of a fully integrated transport plan for southwest Sydney, giving passengers choices between dedicated and existing local bus services, rail services, light rail, active transport and turn up and go Metro services to and from Sydenham station.

Find out more at transportnsw.info/southwestlink

Timing

This cycle link is temporary. Some sections of this route will be further upgraded after Metro services to Bankstown begin, as part of a longer cycle link adjacent to the Metro rail corridor.

Project lookahead – interim cycle link

	Q2 2024	Q3 2024	Q4 2024	Q1 2025	Q2 2025	Q3 2025	Q4 2025	
Installation of critical trackside, signalling and communications equipment	↑							
Delivery of an interim cycle link between Marrickville Station and Sydenham Station	↑							
Final conversion shutdown of T3 Line, including remaining construction works, testing and commissioning	↑	Up to 12 months (starting between July and October 2024)						

We are here

Timeline is indicative only and may be subject to change.

Why has Sydney Metro chosen to deliver this section of the active transport link earlier?

The interim cycle link will provide the local community with an additional travel option to connect directly to Metro services at Sydenham Station while stations are closed for the final Metro conversion works.

Why has Sydney Metro chosen this route?

The route has been designed to maximise connectivity between the two stations.

Where possible, Sydney Metro has attempted to minimise impacts by using existing cycle ways and rail corridor land.

What are the benefits of the active transport link?

The new pedestrian and cycling link will enhance active transport links to Metro stations and improve connections to existing pedestrian and cycling networks.

The new link aligns with the NSW Government’s Active Transport strategy by delivering continuous and connected cycling network infrastructure across NSW.

Will there be any impacts from construction of the new link?

Some changes to existing traffic intersections will be required to construct new crossings, including at Charlotte Avenue, Marrickville. This may result in parking impacts on the route. Depending on the final design, approximately five parking spots in total are expected to be impacted.

Temporary lane and footpath closures may occur during construction.

What consultation has already taken place?

Consultation is underway with Inner West Council to align the design with Council’s local transport strategies as much as possible.

What are the next steps?

Detailed design development for the interim path is ongoing, with construction expected to start in Q2 2024 and be opened before the T3 Line final Metro conversion shutdown begins.

We would like to hear from you

If you have any questions or feedback, please contact the project team at southwestmetro@transport.nsw.gov.au or 1800 171 386.

Contact us

If you have any questions or would like more information please contact our project team:

1800 171 386 Community infoline open 24 hours
sydneymetro@transport.nsw.gov.au
 Sydney Metro City & Southwest
 PO Box K659, Haymarket NSW 1240

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Sydney Metro City & Southwest

Project Update – Meeks Road

Interim cycle link between Marrickville Station and Sydenham Station

August 2024

What is happening?

Sydney Metro will deliver an interim cycle link between Marrickville Station and Sydenham Station for the community to use during the final Metro conversion shutdown of the T3 Bankstown Line. The 1.7 kilometre link will provide the Inner West community with an additional travel option to connect directly to metro services at Sydenham Station.

Interim cycle link project overview



Route for the cycle link between Marrickville Station and Sydenham Station.

The cycle link begins at Station Street in Marrickville and connects to the northern end of Sydenham Station, at the new station entrance on Railway Parade. The route will use existing shared paths and cycleways that are adjacent to the rail corridor, as well as some new paths and on road sections to be constructed.

What is happening?

As part of the interim cycle link, a new separated cycleway is being constructed along the eastern kerbside parking lane on Meeks Road (the Sydenham Station side of the road). The existing parking lane will be re-established adjacent to the cycleway.

New line markings required to delineate driveways will result in a loss of two on-street parking spots. Existing driveway accesses will not be impacted.

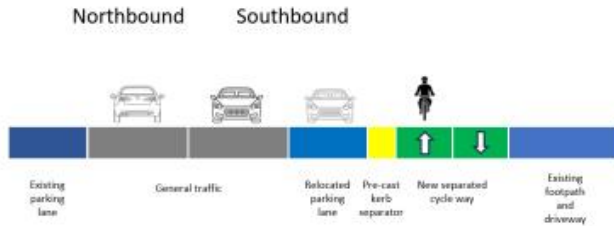


What work will occur?

Works on Meeks Road will include:

- Pavement installation and line markings to establish the separated cycleway and reflect changed road configurations, including the relocated parking lane and new median
- Resurfacing and restoration of kerbs, footpaths and intersecting driveways will take place as required
- Installation of new signage and installation of temporary solar lighting.

Figure 1: typical cross section of Meeks Road with the cycle way (Not to scale, indicative only)



When will work start and finish, and when will work occur?

Works on the interim cycle link are expected to start in late-August, and the link will be opened before the final conversion shutdown of up to 12 months, starting no later than October 2024. You will further notifications before we begin work.

To minimise traffic and parking impacts, works are proposed to take place largely at night between 8pm and 5am. Noisier activities will take place in the evening where possible. Work is not scheduled for Friday, Saturday or public holidays.

How will this impact me?

There will be temporary traffic changes, including partial lane closures and reduced speed limits, during work hours.

Parking along the eastern side of Meeks Road will be temporary unavailable when works are taking place. Notifications and reminder slips will be placed on car windscreens requesting vehicles be moved prior to works in that area.

Access to homes and businesses may be intermittently impacted while we complete works on adjacent sections of footpath. We will notify you before work in your area. Any impacted areas will be restored for use by 5am each day.

What other impacts can I expect?

Work activities will be noisy at times, however we will do everything we can to minimise impacts. This includes turning off equipment when not in use, positioning equipment away from homes and businesses and completing noisier activities by midnight, where possible. Any highly impacted residents will also be notified separately.

Who do I contact if I have questions about this work?

We would welcome the opportunity to meet with you to discuss our work and how we can minimise potential impacts. To arrange a meeting, please contact our 24-hour Community Information Line on 1800 171 386 or email southwestmetro@transport.nsw.gov.au.

If you need help understanding this information, please contact the Translating and Interpreting Service on 131 450 and ask them to call us on 1800 171 386

Thank you for your cooperation and understanding while we complete this work.

Contact us

- 24-hour Community Information Line 1800 171 386
- southwestmetro@transport.nsw.gov.au
- Sydney Metro City & Southwest, PO Box K659, Haymarket NSW 1240



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Sydney Metro City & Southwest

Project Update – Railway Parade

Interim cycle link between Marrickville Station and Sydenham Station

August 2024

What is happening?

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Interim cycle link project overview



Route for the cycle link between Marrickville Station and Sydenham Station.

The cycle link begins at Station Street in Marrickville and connects to the northern end of Sydenham Station, at the new station entrance on Railway Parade. The route will use existing shared paths and cycleways that are adjacent to the rail corridor, as well as some new paths and on road sections to be constructed.

Why was this route chosen?

The route was chosen to improve connectivity between the two stations.

The footpath on Lower Railway Parade has been chosen as part of the interim route as it does not conflict with pedestrians and bus users nearer to Sydenham Station and avoids interacting with bus traffic entering Lower Railway Parade from Marrickville Road.

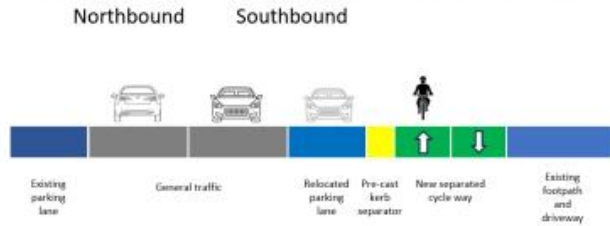


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