



**Independent Environmental Audit Report 2 (IA2)  
Sydney Metro**

**Sydney Metro Western Sydney Airport (SSI 10051)  
Stations, Systems, Trains, Operations and Maintenance  
(SSTOM)**

**Audit Date: 14 August 2024**

**Morasey Ref: MESYM: 2024105-01**

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## Independent Environmental Audit Report 2 (IA2)

### Sydney Metro

### Western Sydney Airport (SSI 10051)

### Stations, Systems, Trains, Operations and Maintenance (SSTOM)

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## EXECUTIVE SUMMARY

This report presents the findings of the Independent Environmental Audit (IEA) conducted by Morasey Environment Pty Ltd for Sydney Metro Western Sydney Airport (WSA) - Stations, Systems, Trains, Operations and Maintenance (SSTOM). This audit is the 6<sup>th</sup> IEA conducted for the WSA project, and the 2<sup>nd</sup> IEA conducted for SSTOM.

The temporal period covered by the audit is between the date of the 1<sup>st</sup> SSTOM IEA on 13<sup>th</sup> February 2024 to the date of the site inspection for this IEA 2 (IA2) on 14<sup>th</sup> August 2024. The environmental performance of the project was assessed at the time of the site inspection.

The details of the Development are as follows:

<b>Application Number:</b>	SSI 10051
<b>Applicant:</b>	Sydney Metro
<b>Consent Authority:</b>	Minister for Planning and Public Spaces
<b>Land:</b>	Land in the suburbs of Oxley Park, North St Marys, St Marys, Werrington, Werrington County, Kingswood, Claremont Meadows, Caddens, St Clair, Erskine Park, Orchard Hills, Luddenham, Greendale, Badgerys Creek, Kemps Creek and Bringelly, in the City of Penrith and City of Liverpool local government areas.
<b>Date of Consent:</b>	23 July 2021
<b>Description:</b>	<p>Development of the Sydney Metro Western Sydney Airport project comprising:</p> <ul style="list-style-type: none"> <li>• construction and operation of approximately 23 kilometres of railway track between the T1 Western Line rail line and the proposed Western Sydney Aerotropolis in Bringelly,</li> <li>• construction and operation of new stations and associated ancillary infrastructure at St Marys, Orchard Hills, Luddenham and the Aerotropolis Core precinct,</li> <li>• interchange links with the existing T1 Western Line rail line,</li> <li>• construction and operation of a train stabling and maintenance facility, including an operational control centre,</li> <li>• construction and operation of associated rail infrastructure facilities,</li> <li>• construction of tunnels, bridges, viaducts and associated works,</li> <li>• site preparation and enabling earthworks, including land remediation,</li> <li>• associated ancillary infrastructure and works.</li> </ul>

The purpose of this audit was to undertake the necessary assessment and review of compliance with SSI 10051 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Construction Environmental Management Plan (CEMP) and Sub-plans. Specifically, this audit was required to satisfy Condition A36 of SSI 10051 which requires Independent Audits of the development to be carried out in accordance with the Independent Audit Post Approval Requirements (IAPARs) prepared by the NSW Department of Planning, Housing and Infrastructure (DPHI), dated May 2020.

This Audit has been conducted in accordance with the IAPARs, and AS/NZS ISO 19011:2014 – Guidelines for Auditing Management Systems. The IAPARs require Independent Audits to be conducted every 26 weeks during Construction, until which time the project becomes operational.

In summary, a total of **222 conditions** were assessed. **Three non-compliances** were identified, two of which had been self-reported by the Project during the audit period. **11 Observations** with recommendation for improvement were identified. Positive observations have been reported in **Section 4.7** of this audit report and in commentary documented throughout the audit.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents (management plans, procedures, strategies and construction monitoring programs) that formed a part of the Audit Scope. The level of implementation of these requirements on site was also observed as high.

The Auditor would like to thank the Auditees from Sydney Metro and the contractor, Parklife Metro for their organisation, cooperation and support during the audit.

# Independent Environmental Audit Report 2

## Sydney Metro

### Western Sydney Airport

### Stations, Systems, Trains, Operations and Maintenance (SSTOM)

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## 1. INTRODUCTION

This report presents the findings of the Independent Environmental Audit (IEA) conducted by Morasey Environment Pty Ltd for Sydney Metro Western Sydney Airport (SM-WSA), Stations, Systems, Trains, Operations and Maintenance (SSTOM). This audit is the 6<sup>th</sup> IEA conducted for the SM-WSA project, and the 2<sup>nd</sup> IEA conducted for SSTOM and has been conducted in accordance with the NSW Department of Planning, Housing and Infrastructure (DPHI) Independent Audit Post Approval Requirements, May 2020 (IAPARs).

The project was approved as State Significant Infrastructure (SSI 10051) on 23<sup>rd</sup> July 2021, and Modification 1 (MOD 1) was approved on 14<sup>th</sup> April 2022.

### 1.1 The Project

#### 1.1.1 Overview

The SM-WSA project involves the construction and operation of a new 23 kilometre metro rail line between St Marys and the Western Sydney Aerotropolis, within the Penrith and Liverpool local government areas. The Metro will provide an interchange with the Sydney Trains network at St Marys. Refer to **Figure 1** for an overview of the SM-WSA Project.

The project includes tunnels between St Marys and Orchard Hills, and between Western Sydney International Airport and Aerotropolis Core, and surface and viaduct rail between Orchard Hills and Western Sydney Airport.

The project is a committed initiative identified in the Greater Sydney Region Plan: A Metropolis of Three Cities – connecting people (Greater Sydney Commission, 2018), Building Momentum: NSW State Infrastructure Strategy 2018-2038 (Infrastructure NSW, 2018) and Future Transport Strategy 2056 (TfNSW, 2018).

The SM-WSA Environmental Impact Statement (EIS) was prepared in October 2020, which assessed the impacts of the construction and operation of the Project. The Project EIS was placed on public exhibition for a period of six weeks from 21 October to 2 December 2020. The Project was declared Critical State Significant Infrastructure (CSSI) and is listed in Schedule 5 of *State Environmental Planning Policy (State and Regional Development)*.

The project that is the subject of this audit is Stations, Systems, Trains, Operations and Maintenance (SSTOM), and includes the following:

- Station design and fit-out, urban and landscape design, precinct and transport integration works
- Finishing works and testing and commissioning
- Operation of the Western Sydney Airport metro service (operation of SM-WSA will be managed by separate Operational Environmental Management Plan (OEMP) and Sub-plans).

An overview of the SSTOM project is presented in **Figure 2**.

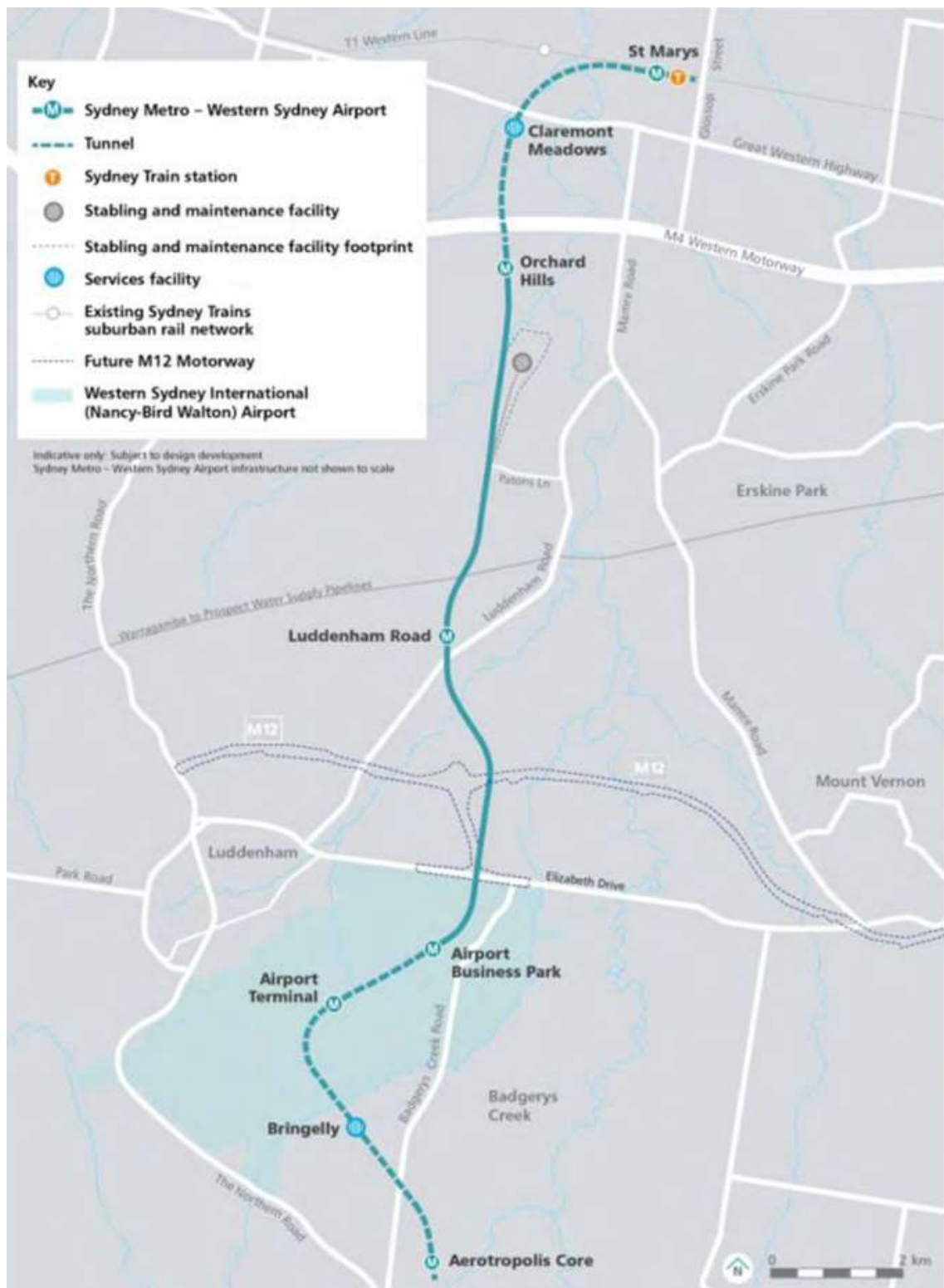


Figure 1: Key Features SM-WSA, Source: DPE Modification Assessment, 2022



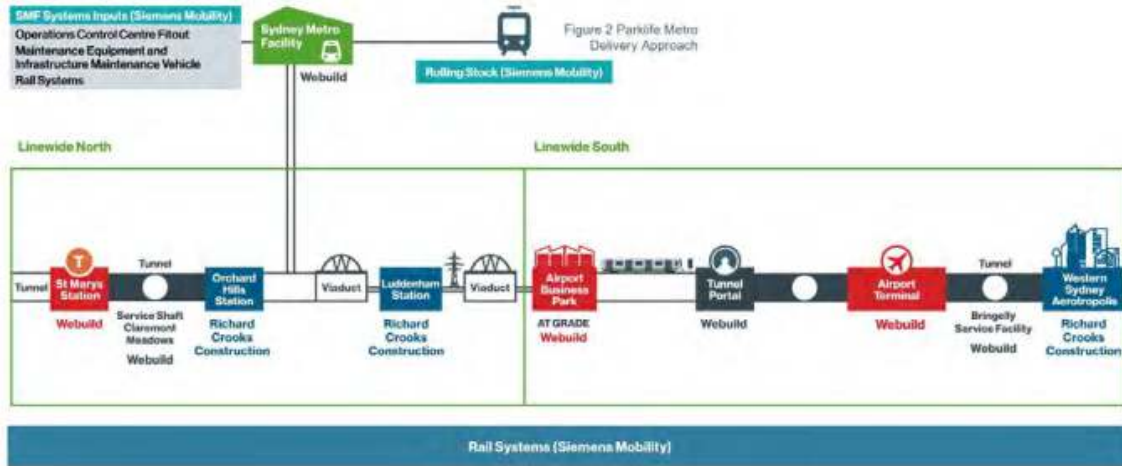


Figure 2: Overview of SSTOM Works, Source: SSTOM CEMP

### 1.1.2 Planning Approval

Details of the project are as follows:

- Application Number:** SSI 10051
- Applicant:** Sydney Metro
- Consent Authority:** Minister for Planning and Public Spaces
- Land:** Land in the suburbs of Oxley Park, North St Marys, St Marys, Werrington, Werrington County, Kingswood, Claremont Meadows, Caddens, St Clair, Erskine Park, Orchard Hills, Luddenham, Greendale, Badgerys Creek, Kemp's Creek and Bringelly, in the City of Penrith and City of Liverpool local government areas.
- Date of Consent:** 23 July 2021

The SM-WSA Project was approved by the Minister for Planning and Public Spaces on 23 July 2021 (SSI 10051) under section 5.19 of the *Environmental Planning and Assessment Act 1997* (EP&A Act). Construction commenced in 2021 and is expected to be completed in 2026.

### 1.1.3 Changes to the Project

The following section describes any approved changes to the project since the time of the planning approval (SSI 10051), within the audit period.

#### a. Modifications

SSI-10051-Modification 1 (MOD 1) was approved on 14<sup>th</sup> April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement.

#### b. Consistency Assessments

There were no Consistency Assessments (CAs) prepared or determined by Sydney Metro during the audit period.

#### c. Environmental Reviews

Four Environmental Reviews (ERs) were determined by Sydney Metro during the audit period and have been considered during the audit:

**ER 001: Aerotropolis Overland Pipeline for Water Treatment Plant Discharge**

ER 001 was prepared to seek approval for extending a pipeline from a Water Treatment Plant (WTP) in Bradfield and within the existing Aerotropolis Core construction footprint extending east to the site boundary adjacent to Thompsons Creek. The works area would be approximately 230 metres in length within Western Parkland City Authority (WPCA) land (and will extend another 45 meters into Thompsons Creek within an adjacent lot (Lot 274 DP 803167).

The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 12<sup>th</sup> March 2024.

**ER 002 - Kent Road Watermain**

ER 002 was prepared to seek approval for the undertaking of utility and geotechnical investigations, and Construction of the Kent Street Watermain to provide permanent water supply to the Orchard Hills Precinct.

The proposed changes were deemed to be consistent with the with the EIS and Submissions Report and was approved by Sydney Metro on 27<sup>th</sup> March 2024.

**ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main**

ER 003 was prepared to seek approval for the undertaking of utility and geotechnical investigations, and Construction of the Lansdowne/Samuel Marsden sewer main to provide a permanent wastewater connection for the Orchard Hills Station and precinct as well as to provide capacity for pumped discharge from the Stabling and Maintenance Facility.

The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 29<sup>th</sup> April 2024.

**ER 004 - SWD Survey works (alignment wide)**

ER 004 was prepared to seek approval for non-intrusive survey work, required to input into the digital design space and ensure a high degree of accuracy for Project design and construction.

The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 7<sup>th</sup> June 2024.

**1.1.4 Project Staging**

The SM-WSA Staging Report, Revision 10.0, April 2024 was prepared and structured to address the requirements of Conditions of Approval (CoA) A10 to A16 of the CSSI 10051 planning approval. The stages of the project comprise of:

- Advanced and Enabling Works (AEW)
- Station Boxes and Tunnelling (SBT)
- Surface and Civil Alignment Works (SCAW)
- Stations, Systems, Trains, Operations and Maintenance (SSTOM)

This audit is focussed on the last stage of works, SSTOM. Appendix A of the Staging Report sets out the applicability of Conditions of Approval to each stage. The current version of the Staging Report (Revision 10.0) was utilised during this audit to inform applicable conditions to the audit stage.

**1.1.5 Audit Period**

The audit period is between the date of the Initial SSTOM Independent Audit on 13<sup>th</sup> February 2024 to the date of the site inspection for this Independent Audit 2 (IA2) on 14<sup>th</sup> August 2024. The status of site documentation was confined in time to between these dates. The environmental performance

of the project was assessed at the time of the site inspection on 14<sup>th</sup> August 2024. The following activities were undertaken during the audit period:

**St Mary's Station (STM):**

- Piling and pile break-back
- Tower crane erected
- Waterproofing and Form Reo Pour (FRP) for base slabs in the station box.

**Orchard Hills Station (OHE):**

- Piling; Pile break-back, Waterproofing and Sump construction in the station box
- Car park extension
- Construction of the Boral Concrete Batch Plant, including FRP for base slabs.

**Stabling and Maintenance Facility (SMF):**

- Construction of the site compound and light vehicle car park; Revision of haul roads
- Spoil deliveries from Western Tunnelling Package (Metro West) for pad fill; Substation filling
- Realignment of boundary swale and commencement of permanent stormwater drainage works
- Connection of 132kv power works.

**Luddenham Station (LUD):**

- Piling
- Removal of ABP stockpiled material to SMF.

**Aerotropolis Core (AEC):**

- Pile break-back and sump construction in the station box.

## 1.2 Audit Objectives

The objective of this Independent Audit is to satisfy SSI 10051 Condition A36, which states:

*Independent Audits of the CSSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020)*

The Independent Audit has been undertaken to meet the requirements of the Independent Audit Post Approval Requirements (IAPARs), which sets out the audit methodology and reporting requirements for the Independent Audit.

### 1.3 Audit Scope

The Independent Audit comprises of four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance, and Reporting. IA2 covers the period from 13<sup>th</sup> February 2024 to 14<sup>th</sup> August 2024 (the 'audit period').

The scope of the Independent Audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- An assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in Appendix A of the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - actual impacts compared to predicted impacts documented in the environmental impact assessment;
  - the physical extent of the development in comparison with the approved boundary;
  - incidents, non-compliances and complaints that occurred or were made during the audit period;
  - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
  - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

The audit commenced with a site inspection on 14<sup>th</sup> August 2024 and pertains to post-approval requirements and compliance during Construction of the following stages:

- SSTOM (commencement of Construction, dated 8<sup>th</sup> August 2023).

## 1.4 Audit Team and Auditor Approval

In accordance with Condition of Approval (CoA) A36-A40 of SSI 10051, and Section 3.1 of the Independent Audit Post Approval Requirements (IAPAR), independent audits must only be undertaken by a suitably qualified, experienced and independent auditor; the appointment of the auditor agreed in writing by the Planning Secretary before each audit is commissioned.

**Table 1** presents the audit team for SM-WSA SSTOM IA2.

**Table 1: Audit Team**

Name & Position	Company	Audit Role	Certification
██████████ ██████████	Morasey Environment Pty Ltd	Lead Auditor	Exemplar Global Certified, Principal Auditor, Environmental Management Systems Auditor, (Certificate No. 111000)
██████████ ██████████	Trigalana Environmental Pty Ltd	Auditor	Exemplar Global Certified, Principal Auditor, Environmental Management Systems Auditor

The Audit Team was approved by the Department of Planning, Housing and Infrastructure (the Department | DPHI) in correspondence dated 4<sup>th</sup> July 2024. The Department’s Letter of Agreement to the Audit Team is included as **Attachment 2** and the Auditor’s Declaration of independence is included as **Attachment 3**.

## 2. AUDIT METHODOLOGY

The Independent Audit was conducted in a manner consistent with below reference documents and evidence submitted for review during the audit:

- Independent Audit Post Approval Requirements (NSW DPIE, May 2020)
- ISO 14001: 2015 Environmental Management Systems
- AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems

### 2.1 Audit Planning and Scope Development

The auditee organisations (together referred to as the Auditee/s or Project team) were identified as follows:

- **The Proponent:** Sydney Metro
- **The SSTOM Contractor:** ParkLife Metro (PLM).

Personnel representing the Auditees is identified in **Table 2** below. Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditees
- Confirm the DPHI approved audit team
- Confirm the audit objectives, scope, audit period and indicative audit program
- Consult with DPHI on the audit scope.

#### 2.1.1 Agency Consultation

Section 3.2 of the IAPARs requires the auditor to “consult with the Department, who may request that other parties or agencies are consulted, including the Community Consultative Committee chairperson (if one is required for the project), to obtain their input into the scope of the audit”.

The NSW Department of Planning, Housing and Infrastructure (DPHI) was consulted via email on 8<sup>th</sup> July 2024 to obtain input on the scope of the Independent Audit DPHI responded on 24<sup>th</sup> July 2024 and requested that the NSW Environment Protection Authority (EPA), Penrith and Liverpool City Councils also be consulted.

NSW EPA, Penrith and Liverpool City Councils were consulted on 25<sup>th</sup> July 2024 to provide input to the scope and confirm any key issues they would like examined, relating to post-approval requirements and compliance. A summary of the key issues and areas of focus raised by stakeholders during consultation is presented in **Table 2**.

Consultation is also discussed in **Section 4.6** and consultation records are presented in **Attachment 4**.

**Table 2: Key issues and areas of focus raised during stakeholder consultation**

Stakeholder	Key Issues	How Addressed including Section Reference
DPHI	<p>Scope consultation correspondence was issued to DPHI on 8<sup>th</sup> July 2024. DPHI responded on 24<sup>th</sup> July 2024 requesting:</p> <p><i>“As discussed, notwithstanding that two audit teams have been approved for the sixth construction phase independent audit of the Sydney Metro Western Sydney Airport project (SSI-10051) (our ref. PA-435), the purpose of any audit under the Independent Audit Post Approval Requirements (May, 2020; <b>Independent Audit PAR</b>) is to obtain a holistic point-in-time assessment of the environmental performance and compliance status of a project. As such in reviewing environmental performance and management plans as required under section 3.3 of the Independent Audit PAR, please ensure:</i></p> <ul style="list-style-type: none"> <li>• <i>consistency assessments / environmental reviews for the period are identified</i></li> <li>• <i>the staging report is reviewed</i></li> <li>• <i>interfaces and cumulative impacts between SSTOM and other project stages (SBT, SCAW, AEW) are considered</i></li> <li>• <i>the accuracy and adequacy of SSTOM management plans is reviewed, including preparedness for imminent phases like linewide.</i></li> </ul> <p><i>Please also consult with the NSW EPA, Penrith and Liverpool City Councils – in doing this, you may like to coordinate with the other approved audit team”.</i></p>	<p>This audit was conducted in accordance with SSI 10051 CoA A36 and the IAPAR. All conditions have been assessed for the current works, noting the staged construction. Refer Staging Report, Appendix A.</p> <p>Consistency assessments and Environmental Reviews are identified in <b>Section 1.1.3</b> and in <b>Attachment 1</b> Audit Table.</p> <p>Project Staging is addressed in <b>Section 1.1.4</b>. The allocation of conditions was discussed during the audit interview with Sydney Metro and Parklife Metro on 15/8/2024 and included discussion of future allocation for conditions related to tree removal (E11 &amp; E12) and key fish habitat (E8-E10), that may become relevant for SSTOM later in the project (due to allocation of species credit (Condition E4) and proposed creek crossings). Refer to audit commentary, <b>Condition A13</b> of <b>Attachment 1</b> for more detail.</p> <p>Interfaces and cumulative impacts from other nearby construction sites have been managed through monthly Cumulative Impact Meetings. Issues discussed in meetings include a lookahead for out of hours work at each location, and potential for cumulative impacts related to environmental aspects including Surface water management, Air quality and Heavy Vehicle (HV) movements during peak hours. Truck movements for SCAW and SBT were decreasing due to completion of imports and tunnelling works, while truck movements associated with SSTOM were predicted to be increasing as works ramp up. Potential for CIs with M12 works was also considered. Refer to <b>Section 4.4.1</b> and audit commentary, <b>Condition B2</b> of <b>Attachment 1</b> for more detail.</p> <p>A high-level assessment of the environmental management plans/sub-plans is included. Refer <b>Section 4.3</b>. Recommendations for improvement to the CEMP and Sub-plans has been captured as part of the Observations raised during the audit. Refer <b>Section 4.2, Table 6</b>.</p>

Stakeholder	Key Issues	How Addressed including Section Reference
		<p>The environmental performance of the development was assessed, including but not limited to actual versus predicted impacts. Refer <b>Section 4.7</b>.</p> <p>Consultation with NSW EPA, Liverpool and Penrith Councils issued on 25<sup>th</sup> July 2024, requesting a response before 8<sup>th</sup> August 2024. Refer EPA and Council consultation below.</p>
NSW EPA	<p>Scope consultation correspondence issued to EPA on 25<sup>th</sup> July 2024.</p> <p>There was no response received.</p>	N/A
Liverpool City Council	<p>Scope consultation correspondence was issued to Liverpool City Council on 25<sup>th</sup> July 2024. Council responded on 24<sup>th</sup> July 2024 requesting:</p> <p><i>“Council have reviewed the terms of the IAPAR and consider that the Scope of Audit 6 satisfy these requirements. In terms of compliance issues, Council have not been informed of any specific variations to SSI-10051 Sydney Metro Western Sydney Airport. Council is satisfied that the Audit scope will ensure that compliance issues will be identified and resolved as part of this process. Council would request that we be advised when Audit 6 is available for public view, so this document may be downloaded and included on Council’s relevant file for the site”.</i></p>	Noted
Penrith City Council	<p>Scope consultation correspondence issued to Penrith City Council on 25<sup>th</sup> July 2024.</p> <p>There was no response received.</p>	Noted

The Auditor performed a document review, prepared an Audit Plan and prepared an Initial Request for Information (RFI), which were distributed to the Auditees in preparation for the Independent Audit.



## 2.2 Auditees

**Table 3** identifies the Auditees and other personnel involved in the audit process.

**Table 3: Auditees and key personnel**

Organisation	Position	Name	Involvement
Sydney Metro	Environment Manager	██████████	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
Sydney Metro	Manager, Precinct & Place	██████████	Opening & Closing meetings, & Interviews
Sydney Metro	Environment Coordinator	██████████	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
Sydney Metro	Director Project Environment, Sustainability & Planning	██████████	Closing meeting & Project coordination
Sydney Metro	Environment Manager	██████████	Project coordination
Sydney Metro	Communications Manger	██████████	Interview
ParkLife Metro (PLM)	Environment Manager	██████████	Closing meeting
PLM	Senior Environmental Advisor	██████████	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
PLM	Senior Environmental Advisor	██████████	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
PLM	Environmental Graduate	██████████	Opening meeting, Site inspection, & Interview
HBI	Environmental Representative	██████████	Interview

## 2.3 Site Inspection and Meetings

The site inspection, opening and closing meetings were held with Project personnel as identified in **Table 3**. The site inspections was conducted on 14<sup>th</sup> August 2024 and covered the following areas:

- St Marys Station
- Orchard Hills Station

**NB:** The Stabling and Maintenance Facility (SMF) was also flagged for inclusion in the site inspection but was not accessible due to weather with a shutdown imposed by the WHS team.

Site inspection photos, observations and notes are presented **Section 6**.

The opening meeting was held on site on 14<sup>th</sup> August 2024. During the opening meeting, the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed.

A closing meeting was held remotely (via Teams) with Sydney Metro and PLM on 16<sup>th</sup> September 2024. At the closing meeting, preliminary audit findings were presented, including a summary of preliminary Non-compliances, Observations and Recommendations.

## 2.4 Interviews and verification of evidence

The Independent Audit included the review of publicly available and requested documents, records and registers to evaluate compliance. Interviews with key project personnel were conducted and further documentary evidence was also sought to verify responses provided by Auditees.

Refer to **Section 2.2** for details on the personnel interviewed. Audit interviews and verification of evidence sessions were conducted with the Auditees as follows:

- Environmental Representative: 19<sup>th</sup> August 2024 and 6<sup>th</sup> September 2024
- Sydney Metro Communications Manager: 16<sup>th</sup> August 2024
- PLM & Sydney Metro: 15<sup>th</sup> August 2024.

In addition to the above, the Auditor requested further information, to obtain evidence that was not accessible on project websites or available during the audit interviews and document reviews/in past RFIs. These requests were provided promptly by the Auditees within required timeframes.

## 2.5 Generating audit findings

Independent Audit findings were based on verifiable evidence collected and reviewed. The evidence included:

- Correspondence from DPHI and other stakeholders
- Records, documents and specialist reports
- Interviews with relevant personnel
- Figures, plans and photographs
- Site inspection
- Monitoring data and analysis.

Other applicable approvals, permits or Project-specific environmental requirements (as documented within the Audit Table in **Attachment 1**).

## 2.6 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table, using the descriptors from Table 2 of the IAPAR, as listed in **Table 4**, below:

**Table 4: Compliance descriptors from Table 2 of the IAPAR**

Status	Description
<b>Compliant</b>	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.
<b>Non-compliant</b>	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.
<b>Not Triggered</b>	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.

Observations and notes have also been made to provide context, and/or identify any opportunities for improvement. This includes positive observations where the project has applied initiatives beyond compliance requirements.

### 2.6.1 Evaluation of post audit approval documentation

The Auditor assessed whether post approval documents:

- were developed in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate
- have been implemented in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any).

The adequacy of post approval documents was determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document; or
- whether there are any opportunities for improvement.

### 2.6.2 Review

The Draft Independent Audit Report was distributed to the Auditees for review to ensure content is factual and representative. Audit findings have been determined independent of the Auditees, DPHI and any other parties, and based on the evidence assessed during the audit.

### 3. LIMITATIONS

The audit has been prepared in accordance with the associated proposal and Morasey's Terms and Conditions. This report is for the sole purposes of the Client. Except as required by law, no third party may use or rely on this Report unless otherwise agreed by Morasey in writing.

The site inspection component of the audit was limited to observable aspects that could be noted during a 'walk through' inspection of the construction site. Sampling or monitoring was not included in the scope of this audit. Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The matters raised in this report are only those which came to our attention during the course of performing our assessment and are not necessarily a comprehensive statement of all the weaknesses that may exist or improvements that might be made. Our work is performed on a sample basis; we cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of construction/operation and their responsibility to prevent and detect irregularities.

Recommendations and suggestions for improvement should be assessed by management for their full commercial impact before they are implemented. We have generally used and relied upon information supplied as being regarded as authoritative and reliable, but no warranty of completeness, accuracy, or reliability is given. The document review conducted during this assessment was limited to those documents and information supplied as part of the audit. The audit scope did not include the independent verification of these sources unless otherwise noted within the report. The scope of this audit does not extend to the verification of items assessed by the Certifier prior to issuing of a certificate for any stage. Morasey will not accept any liability for inaccurate conclusions if the information provided was incomplete, inaccurate, withheld, misrepresented or otherwise not fully disclosed.

To the best of Morasey's knowledge, the facts and matters described in this report reasonably represent the Client's intentions at the time of which Morasey issued the report to the Client. However, the passage of time, the manifestation of latent conditions or the impact of future events (including a change in applicable law) may have resulted in a variation of the report and its possible impact. Morasey will not be liable to update or revise the report to take into account any events or emergent circumstances or facts occurring or becoming apparent after the date of issue of the report.

This Report does not purport to give legal advice; legal advice can only be given by qualified legal practitioners. To the extent permitted by law, Morasey expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any third party relating to or resulting from the use of, or reliance on, any information contained in this report (including without limitation matters arising from any negligent act or omission of Morasey). Morasey does not admit that any action, liability or claim may exist or be available to any third party.

## 4. AUDIT FINDINGS

The following sections provide a summary of the findings of the audit. The Audit Table is provided in **Attachment 1** and includes details of the evidence collected, observed and provided in support of compliance with the audit criteria. Evidence collected during the site inspection and interviews with personnel has also been included.

### 4.1 Approvals and documents audited, and evidence sighted

Key documentation reviewed during the audit is listed below. A more comprehensive list of documents and evidence sighted in relation to each Condition of Approval is detailed within the Audit Table (**Attachment 1**):

- ParkLife Metro SSTOM Construction Environment Management Plan (CEMP), Rev 01 19/7/2024
- ParkLife Metro SSTOM Air Quality Management Sub Plan (AQMP), Rev 01, 20/7/2023
- ParkLife Metro SSTOM Construction Traffic Management Plan (CTMP) Orchard Hills Station, Rev02, dated 11/6/2024
- ParkLife Metro SSTOM Flora and Fauna Management Sub Plan (FFMP), Rev 02, 13/3/2024
- ParkLife Metro SSTOM Noise and Vibration Management Sub-plan (NVMP), Rev 02, 1/8/2023
- ParkLife Metro SSTOM Non-Aboriginal Heritage Management Sub Plan (NAHMP), Rev 01, 17/7/2023
- ParkLife Metro SSTOM Soil and Water Management Sub Plan (SWMP), Rev 01, 17/7/2023
- ParkLife Metro SSTOM Visual Amenity Management Sub Plan (VAMP), Rev 00, 27/6/2023
- ParkLife Metro SSTOM Waste Management Sub Plan (WMP), Rev 01, 28/7/2023
- ParkLife Metro SSTOM Noise & Vibration Construction Monitoring Report February 2024, Rev01 dated 5/6/2024
- ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807
- ParkLife Metro SSTOM Small Business Owners Engagement Plan, St Marys, Rev0, dated 10/11/2023
- ParkLife Metro Project website: <https://parklifemetro.com.au/project/>
- ParkLife Metro STM Precinct Utility Package Design Report, Stage 2, RevA, dated 3/10/2023
- ParkLife Metro SM-WSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Orchard Hills, Rev05, dated 1/8/2024
- ParkLife Metro SM-WSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Orchard Hills, Rev03, dated 4/6/2024
- Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1, Ver 0, November 2023
- Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2 (on exhibition)
- Sydney Metro Western Sydney Airport Environmental Impact Statement (WSA EIS), dated October 2020) (the EIS)
- Sydney Metro Western Sydney Airport Submissions Report, submitted April 2021
- Sydney Metro Western Sydney Airport Response to Submissions Report (RtS), dated December 2020
- Sydney Metro Western Sydney Airport Modification 1 – Biodiversity Credits (SSI-10051-MOD-1) Modification Assessment Report, DPHI 2022

- Sydney Metro Western Sydney Airport Modification of Infrastructure Approval (SSI-10051 MOD 1), determined 14 April 2022
- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024
- Sydney Metro Project website: <https://www.sydneymetro.info/documents>
- SM-WSA SSTOM Environmental Review ER 001 - Aerotropolis Overland Pipeline for Water Treatment Plant Discharges – AEC, approved 12/3/2024
- SM-WSA SSTOM Environmental Review ER 002 - Kent Road Watermain, approved 27/3/2024
- SM-WSA SSTOM Environmental Review ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main, approved 29/4/2024
- SM-WSA SSTOM Environmental Review ER 004 - SWD Survey works (alignment wide), approved 7/6/2024
- SM-WSA Overarching Community Communication Strategy OCCS Rev4, dated 14 December 2023
- SM-WSA SSTOM Complaints Report - Feb-July 2024
- SM-WSA Non-Aboriginal Archaeological Research Design, Artefact, April 2021
- SM-WSA Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024
- SM-WSA Out of Hours Work Protocol v2.0, dated 8/11/2021
- SM-WSA Sustainability Plan, January 2022
- SM-WSA Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023
- SM-WSA NSW (Off-airport) Wastewater Discharge Impact Assessment (WDIA), Station Boxes and Tunnelling Works (SBT), RevA.02, dated 17/11/2022
- Construction Worker Car Parking Strategy, St Marys Station Rev0, dated 1/12/2023
- Sydney Metro West (Stage 2) Tunnel Spoil Order, November 2022 (Resource Recovery Order under Part 9, Clause 93 of the POEO (Waste) Regulation 2014)
- Sydney Metro West (Stage 2) Tunnel Spoil Exemption, November 2022 (Resource Recovery Exemption under Part 9, Clauses 91 and 92 of the POEO (Waste) Regulation 2014)
- SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/2022
- Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206, dated 5/12/2023

## 4.2 Non-Compliances, Observations and Actions

This Section presents findings from the 2<sup>nd</sup> Independent Audit (IA2). A summary of the number of conditions assessed and compliance status from IA2 is presented in **Table 5**. An overview of each finding and recommendation is presented in **Table 6**.

The Audit Table is provided in **Attachment 1** and includes details of the evidence collected, observed and provided support of compliance with the audit criteria.

**Table 5: Summary of conditions assessed and compliance status**

SSI 10051 Part	No. Conditions Assessed	Compliance Status			
		Compliant	Non-Compliant	Not Triggered	Observation
Part A	47	35	0	12	<b>4</b>
Part B	11	7	0	4	<b>1</b>
Part C	22	21	<b>1</b>	0	0
Part D	8	0	0	8	0
Part E	134	63	<b>2</b>	69	<b>6</b>
<b>TOTAL</b>	<b>222</b>	<b>126</b>	<b>3</b>	<b>93</b>	<b>11</b>

In summary, a total of **222 conditions** were assessed. **Three non-compliances** were identified, two of which had been self-reported by the Project during the audit period. **11 Observations** with recommendation for improvement were identified.

A summary of findings from IA2 has been presented in **Table 6**. Positive observations are discussed in **Section 4.7**.

Findings from the previous Independent Audit (IA1) were also reviewed. The Auditor was satisfied that all findings from IA1 were closed with adequate evidence presented in support of the findings.

The findings from the previous audit (IA1) are presented in **Table 7**.

**Table 6: Summary of Compliance Status – IA2 (14 August 2024)**

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
<b>SELF-REPORTED NON-COMPLIANCES</b>					
<b>IA2 – NC01</b>	<b>E41</b>	Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances: (b) Low impact, including: (i) construction that causes LAeq(15 minute) noise levels: <ul style="list-style-type: none"> <li>no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and</li> <li>no more than the ‘Noise affected’ NMLs specified in Table 3 of the ICNG at other sensitive land user(s)</li> </ul>	NCR 004 was raised against Condition E41(b)(i) and related to operational noise from a generator at the SSTOM Orchard Hills site.  Notification of the NC to DPHI was within the required 7-day timeframe, and a response from DPHI was received.	N/A	Actions closed by the project during the audit period.  <b>CLOSED</b>
<b>IA2 – NC02</b>	<b>E128</b>	Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).	A NC with Condition E128 (SSI 10051) was raised by the project and notified to DPHI on 27/2/2024. The erosion and sediment controls (ESC) in certain areas of the Orchard Hills (OHE) site were not installed or maintained in a timely manner or before undertaking work, as per the project Erosion and Sediment Control Plan (ESCP), which included:  - The batters located on the northwestern portion of the site were not completely stabilised.	N/A	Actions closed by the project during the audit period.  <b>CLOSED</b>



ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
			<p>- Batter chutes located on the northwestern portion of the site were installed, but geofabric stabilisation requires pinning.</p> <p>- Rocked lined drain leading to the basin south of Lansdowne Road had not been maintained.</p> <p>- Batters above swale drain the drains to the OHE basin were not stabilised, resulting in increased sediment load being captured in the swale drain checks and basin.</p> <p>It is noted that the above actions were previously identified during fortnightly inspections with Sydney Metro and the ER, and timeframes for the identified actions were not closed in the agreed timeframes, resulting in the identified non-compliance.</p>		
<b>NON-COMPLIANCES</b>					
IA2 – NC03	C1	Construction Environmental Management Plans (CEMPs) and CEMP Sub-plans 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	Section 3.4 (f) of the CEMF addresses the preparation of CEMPs and requires " <i>The Principal Contractor CEMP will cover the requirements of the relevant planning approval documentation, the conditions of all other permits and licences, the Principal Contractor's corporate EMS, the environmental provisions of the</i>	Review and update the SSTOM CEMP and SWMP to address requirements for the discharge of wastewater to sewer under the Sydney Water Trade Waste Agreement, as required by the SM-WSA CEMF Sections 3.4(f) and 12.2(a)(viii). An update to the Water Quality Monitoring Program (WQMP) may also be required to	<p><b>Responsibility:</b> PLM Environment Manager</p> <p><b>Due Date:</b> Evidence for submission during IA3, Nov 2024</p> <p><b>Status: OPEN</b></p>

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
		documents listed in Condition A1 will be implemented and achieved during construction.	<p><i>contract documentation and this CEMF".</i></p> <p>Section 12.2 (a)(viii) of the CEMF addresses Soil and Water and requires "<i>Principal Contractors will develop and implement a Soil and Water Management Plan for all off-airport works ... will include as a minimum: The requirements of any applicable licence conditions</i>".</p> <p>The Sydney Water Trade Waste Agreement (TWA) in place for discharge of wastewater to sewer from the St Mary's Water Treatment Plant (WTP) has not been identified in the SSTOM CEMF. The TWA and applicable conditions have also not been identified in the SSTOM Soil and Water Management Sub-Plan (SWMP).</p> <p>It is noted that the option to discharge to trade waste is presented (amongst other options) in the Groundwater Monitoring Program (SWMP, Appendix G), but no details are provided. The TWA was issued after the GWMP was prepared.</p>	satisfy the TWA conditions.	

OBSERVATIONS					
IA2 – OBS 1	A18	Before establishment of any ancillary facility (excluding exempt or complying development, minor ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A22 and those considered in an approved CEMP), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the ancillary facilities.	The process for preparation of Site Establishment Management Plans under Condition A18 has not been addressed in the CEMP.	Review and update the CEMP to include the process for preparation of Site Establishment Management Plans under Condition A18.	<p><b>Responsibility:</b> PLM &amp; Sydney Metro Environment Managers</p> <p><b>Due Date:</b> Evidence for submission during IA3, Nov 2024</p> <p><b>Status:</b> OPEN</p>
IA2 – OBS 2	A22	Lunch sheds, office sheds, portable toilet facilities and the like, can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria:	It is understood that the above MAFs were established at the beginning of the project, prior to preparation of the MAF Assessment checklists.	Review the A22 process, including proposed due diligence assessment with the ER. Ensure the process is documented and agreed with all parties prior to future implementation. If continued, ensure due diligence assessments are conducted prior to implementation of the activity.	<p><b>Responsibility:</b> PLM &amp; Sydney Metro Environment Managers</p> <p><b>Due Date:</b> Evidence for submission during IA3, Nov 2024</p> <p><b>Status:</b> OPEN</p>
IA2 – OBS 3		<p>(a) are located within or adjacent to the Construction Boundary; and</p> <p>(b) have been assessed by the ER to have -</p> <p style="padding-left: 20px;">(i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the ICNG, traffic and access impacts, dust and odour impacts, and visual</p>	The adopted 'due diligence' process for A22 MAFs has not been described in the CEMP.		

		(including light spill) impacts, and (ii) minimal environmental impact with respect to waste management and flooding, and (iii) no impacts on biodiversity, soil and water, and Heritage items beyond those already approved under other terms of this approval.			
<b>IA2 – OBS 4</b>	<b>A47</b>	The CSSI name, application number, telephone number, postal address and email address required under Condition B3 must be available on site boundary fencing / hoarding at each ancillary facility before the commencement of construction. This information must also be provided on the website required under Condition B11.	Signage posted at the main access to the Orchard Hills site did not comply with Condition A47 and was limited to Parklife Metro D&C Construction signage.  <b>NB:</b> Evidence of compliant signage displayed at OHE was provided post-audit on 18/9/2024.	Review signage displayed at PLM sites and ensure it complies with the requirements of Condition A47, i.e. includes the CSSI name, application number, telephone number, postal address and email address.	<b>Responsibility:</b> PLM Environment Manager <b>Due Date:</b> Evidence for submission during IA3, Nov 2024 <b>Status: OPEN</b>
<b>IA2 – OBS 5</b>	<b>B11</b>	A website or webpage providing information in relation to the CSSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 24 months following the completion of all stages of construction of the CSSI. Up-to-date information (excluding confidential, private, commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the	The latest version of the CTMP Orchard Hills Station is Rev02, dated 11/6/2024, as submitted to DPHI on 6/8/2024. The version of the CTMP on the project website was CTMP Orchard Hills Station, Rev0, dated 27/9/2023.	A review of the Sydney Metro and PLM website should be undertaken to ensure all documents are current.	<b>Responsibility:</b> PLM & Sydney Metro Environment Managers <b>Due Date:</b> Evidence for submission during IA3, Nov 2024 <b>Status: OPEN</b>

		website or dedicated pages including: ...			
IA2 – OBS 6	E1	All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction.	Internal haul roads at the Orchard Hills site were muddy and chip seal that had reportedly been applied 2 months prior had washed away and/or sunk into the ground. De-stabilised haul roads in use by heavy vehicles could contribute to sediment load diverted to sediment basins, dust emissions, and increase the risk of sediment laden runoff from the HV access to Lansdowne Road. The Site Supervisor advised further stabilisation would be undertaken as necessary.	Review options and apply suitable measures for the ongoing stabilisation of internal haul roads.	<p><b>Responsibility:</b> PLM Environment Manager</p> <p><b>Due Date:</b> Evidence for submission during IA3, Nov 2024</p> <p><b>Status:</b> OPEN</p>
IA2 – OBS 7	E124	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 <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , or to any other place that can lawfully accept such waste.	REMM WR3 requires a material tracking system would be implemented for material transferred between construction sites. The process outlining requirements for the movement of spoil, ENM & VENM between PLM EPL premise sites was not adequately documented in the Waste Management Sub-plan.	Provide evidence for the approval for the movement of spoil, ENM & VENM between PLM EPL premise sites. Document the process for the movement of spoil, ENM & VENM between PLM EPL premise sites in the Waste Management Sub-plan.	<p><b>Responsibility:</b> PLM Environment Manager</p> <p><b>Due Date:</b> Evidence for submission during IA3, Nov 2024</p> <p><b>Status:</b> OPEN</p>
IA2 – OBS 8			The STM Material Tracking Register (St Marys) did not include all required details, as documented in Section 5.5.1 of the SSTOM WMP. Details missing included: Haulage contractor, Material Type, Waste Reveal Location, Docket numbers.	Review and update the Material Tracking Register template to include all required details, as documented in Section 5.5.1 of the SSTOM WMP. It is also recommended that a reference to the corresponding Waste Classification Report is included in	<p><b>Responsibility:</b> PLM Environment Manager</p> <p><b>Due Date:</b> Evidence for submission during IA3, Nov 2024</p> <p><b>Status:</b> OPEN</p>

IA2 – OBS 9			Receiving Facility with EPL No. 20984 was not listed in the Register of indicative waste disposal locations, Appendix D of the SSTOM WMP.	the Material Tracking Register. Update the Register of indicative waste disposal locations, Appendix D of the SSTOM WMP to include approved disposal locations and EPLs.	<b>Responsibility:</b> PLM Environment Manager <b>Due Date:</b> Evidence for submission during IA3, Nov 2024 <b>Status:</b> OPEN
IA2 – OBS 10	E128	Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).	<b>St Marys:</b> The status of the stormwater connection across the hardstand section of the St Marys station site was unable to be confirmed. ERSED controls for stormwater grates may be inadequate.	Confirm stormwater connection status. If connected, additional controls should be applied to stormwater grates to reduce the risk of sediment entry.	<b>Responsibility:</b> PLM Environment Manager <b>Due Date:</b> Evidence for submission during IA3, Nov 2024 <b>Status:</b> OPEN
IA2 – OBS 11			<b>Orchard Hills:</b> The cattle grid had filled with sediment-laden water and was overflowing onto Lansdowne Road at the heavy vehicle access. Sediment-laden water could also be seen moving across the hardstand driveway onto the nature strip. ERSED controls in place were inadequate. There was no stormwater infrastructure in place along the road, with runoff directed to the nearest waterway.	Review ERSED controls in place at the HV access on Lansdowne Road, including placement of the cattle grid, to reduce the risk of sediment-laden water leaving the site. The dirty water stream may be able to be diverted to the nearby sediment basin (SE Basin).	<b>Responsibility:</b> PLM Environment Manager <b>Due Date:</b> Evidence for submission during IA3, Nov 2024 <b>Status:</b> OPEN

**Table 7: Review of previous audit findings – IA1 (13 February 2024)**

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA2 ASSESSMENT & STATUS
<b>NON-COMPLIANCES</b>					
<b>Nil</b>					
<b>OBSERVATIONS</b>					
<b>OBS-A-1</b>	<b>A22</b>	<p>Lunch sheds, office sheds, portable toilet facilities and the like, can be established and used where they have been assessed in the documents listed in Condition A1 or satisfy the following criteria:</p> <p>(a) are located within or adjacent to the Construction Boundary; and</p> <p>(b) have been assessed by the ER to have -</p> <p>(i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the ICNG, traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and</p> <p>(ii) minimal environmental impact with respect to waste management and flooding, and</p> <p>(iii) no impacts on biodiversity, soil and water, and Heritage items beyond those already approved under other terms of this approval.</p>	<p>Poor maintenance of ground causing collection of water near wheel wash system and buildup of sediment potentially causing dust hazard and sediment pollution at St Marys.</p> <p>This was noted and discussed at the audit site inspection. See Appendix D photos 19-20 and 22.</p>	<p>Improve maintenance of ground conditions at truck wash facility to avoid ponding of water and buildup of sediment potentially causing dust hazard and sediment pollution.</p>	<p>Ground conditions at the wheel wash were well-managed during the IA2 site inspection. No ponding or sediment build-up observed.</p> <p>Addressed in SM - WSA Independent Audit No.5 – Combined Response to Findings, 24/4/2024.</p> <p><b>CLOSED</b></p>
<b>OBS-A-2</b>	<b>A32</b>	<p>For the duration of the work until the commencement of operation,</p>	<p>ER Reports do not specifically refer to receiving or not receiving</p>	<p>ER monthly reports should clarify each sub condition in this condition</p>	<p>There has been no known communication from the</p>

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA2 ASSESSMENT & STATUS
		or as agreed with the Planning Secretary, the approved ER must: (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI;	communication from Planning Secretary. As such, it is not clear if this sub-condition has been triggered or not.	A32 and conform to the ER Protocol.	Planning Secretary in relation to the environmental performance of the CSSI with the ER during the audit period.  Addressed in SM - WSA Independent Audit No.5 – Combined Response to Findings, 24/4/2024.  <b>CLOSED</b>
<b>OBS-B-1</b>	<b>B8</b>	The role of the Community Complaints Mediator is to provide independent mediation services for any reasonable and unresolved complaint referred by the ER where a member of the public is not satisfied by the Proponent’s response.  Where a Community Complaints Mediator is required, a mediator accredited under the National Mediator Accreditation System (NMAS), administered by the Mediator Standards Board must be appointed.	Accreditation details as per National Mediator Accreditation System accreditation details were not available to verify in this audit.	Provide accreditation details of community complaints mediator as onboarded.	Negocio Resolutions was appointed to the role of Community Complaints Mediator on 14/12/2021 for SM WSA, accredited under the National Mediator Accreditation System (NMAS) (ref. 130-3710).  Addressed in SM - WSA Independent Audit No.5 – Combined Response to Findings, 24/4/2024.  <b>CLOSED</b>
<b>OBS-E-1</b>	<b>E56</b>	All work undertaken for the delivery of the CSSI, including those undertaken by third parties (such as utility relocations), must be coordinated to ensure respite periods are provided.	The OOHW schedules are not detailed on the respite or mitigation details.  There are activities with 20-30dB noise occurring at night, however, there are no respite or mitigation measures included.	Provide details of how respite or mitigation of noise impacts from construction of the CSSI is being managed.	Respite is provided in accordance with consultation with the potentially impacted community, as per Condition E57. In addition, the project EPL (EPL21807) requires respite to occur for any works approved under EPL Condition L5.8, in accordance



ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA2 ASSESSMENT & STATUS
					<p>with EPL Condition L5.9.</p> <p>Mitigation measures are implemented in accordance with those identified in the DNVIS, and in accordance with the Additional Mitigation Measures (AMMs) detailed in Table 16 of the SM CNVS and Table 27 of the Project’s NVMP. The OOHW Schedule includes a column (“AMMs”) that identifies the applicable AMMs.</p> <p>Addressed in SM - WSA Independent Audit No.5 – Combined Response to Findings, 24/4/2024.</p> <p><b>CLOSED</b></p>
<b>OBS-E-2</b>	<b>E79 (f,h,i)</b>	<p>The PUDCLP must include descriptions and visualisations (as appropriate) of:</p> <p>(f) details of strategies to rehabilitate, regenerate or revegetate disturbed areas, where relevant;</p> <p>(h) operational maintenance standards; and</p> <p>(i) the timing and responsibilities for implementation of elements included within the PUDCLP.</p>	<p>The compliance table in Section 1.6 notes that this document is preliminary, with more details to be included in the Stage 2 document. This to be confirmed at next audit.</p>	<p>Stage 2 final PUDCLP to include all details as noted in Stage 1 document. This to be confirmed at next audit.</p>	<p>Note only.</p> <p><b>CLOSED</b></p>
<b>OBS-E-3</b>	<b>E102</b>	<p>The Water Reuse Strategy must be prepared based on best practice</p>	<p>Water Reuse Strategy does not include details of consultation or</p>	<p>Water Reuse Strategy should include details of consultation or</p>	<p>The information contained within the Water Reuse Strategy is</p>

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA2 ASSESSMENT & STATUS
		and advice sought from relevant agencies, as required. The Strategy must be applied during construction.	advice from any agencies, or justification for not seeking that advice.	advice from any agencies, of justification for not seeking such advice.	<p>based on advice received during detailed design and other stages of the project from relevant agencies such as Sydney Water to advise availability of recycled water and water connections as well as from WSA Co. to inform options for treatment of groundwater and restrictions on reuse.</p> <p>Addressed in SM - WSA Independent Audit No.5 – Combined Response to Findings, 24/4/2024.</p> <p><b>CLOSED</b></p>

### 4.3 Adequacy of Environmental Management Plan, Sub-plans and Post-Approval documents

As part the Independent Audit, the Auditor reviewed the CEMP, Sub-plans and environmental post-approval documents for each stage (refer Section 4.1 for references) and conducted a high level assessment whether the above documents:

- have been developed in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate
- have been implemented in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any).

The Auditor also assessed the adequacy of post approval documents (on the basis of whether):

- there are any non-compliances resulting from the implementation of the document; or
- whether there are any opportunities for improvement.

The Project's post-approval documents have been reviewed, endorsed and approved by required parties – Sydney Metro, the ER, and DPHI. The endorsements and approvals confirm that the relevant requirements from the Project Approval, the EIS and RtS have been incorporated. This is further reviewed and evidenced in the Audit Table (refer **Attachment 1**).

The CEMP, Sub Plans, Strategies and Construction Monitoring Programs prepared for the Project are of high quality. The evidence reviewed and/or sighted during this Independent Audit indicates that these documents are being implemented; with no non-compliances raised against the mitigations measures within.

### 4.4 Complaints

Complaints are recorded in Consultation Manager, a TfNSW database. ParkLife Metro has a contract obligation to provide three Place Manager roles for SSTOM. The contractor reports Daily Complaints to the NSW Environment Protection Authority (NSW EPA) in accordance with Environmental Protection Licence (EPL) requirements and a Weekly Complaints Report is distributed to DPHI and the Environmental Representative (ER). The ER Project Monthly Report summarises all complaints for the month.

The complaints register was reviewed during the audit and showed eight complaints were received during March-August 2024 that could be attributed to the SSTOM project. Complaints within the reporting period have been focussed predominantly on isolated incidents including the runoff of dirty water to a nearby property (Orchard Hills); Noise during standard construction hours; Road damage (Orchard Hills); and Worker parking (St Marys).

The overall number of complaints received is thought to be generally low in relation to the activities undertaken during the audit period. The number of complaints is predicted to increase in the future with an increase in the scale of activities and the number of out of hours works events conducted across multiple sites, along with an increase in in intensity of noise associated with the project activities.

The complaints register indicates that Sydney Metro and its contractors for each stage have adequately responded to the complaints.

#### 4.4.1 Cumulative Impacts

A review of the Complaints Management System process in relation to the management of potential cumulative impacts from nearby projects, including interface works and other Sydney Metro WSA Packages was conducted during the audit. As requested by DPHI during consultation for IA2, a review of the management of potential cumulative impacts from nearby projects, including other Sydney Metro WSA Packages was conducted.

Potential exists for cumulative impacts from SSTOM and other nearby construction sites, particularly at Orchard Hills and Bradfield stations. Cumulative impacts from interfaces and other nearby construction sites have been managed through monthly Cumulative Impact Meetings. Recent meeting minutes were provided as evidence and included attendees from Sydney Metro, SCAW, SBT, SSTOM and FSM Environment and Project management teams.

Issues discussed in meetings included a lookahead for out of hours work at each location, and potential for cumulative impacts related to environmental aspects including Surface water management, Air quality and Heavy Vehicle (HV) movements during peak hours.

It was noted that truck movements for SCAW and SBT were decreasing due to completion of imports and tunnelling works, while truck movements associated with SSTOM were predicted to be increasing as works ramp up. Potential for cumulative impacts with M12 works was also discussed.

Auditees described the process of Contractors discussing their scope of works at each station daily to determine the potential for cumulative impacts and mitigation. Informal discussions about the minimisation of cumulative impacts also occurs between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site, though it is noted this is an ongoing focus for the project.

#### 4.5 Incidents and Non-Compliances

The Incident and Non-Compliance Register was reviewed during the audit.

Non-compliances identified during the audit period have been discussed in **Section 4.2**. Environmental incidents and non-compliances raised during the audit period were recorded on the Project's Incident and Non-Compliance Register.

No environmental incidents were raised that would require notification under the planning approval within the audit period. Review of the Monthly ER Reports to DPHI aligned with the above reporting of environmental incidents and non-compliances.

## 4.6 Actual vs Predicted Impacts

A qualitative assessment has been undertaken as part of this Independent Audit to assess actual versus predicted impacts for works conducted during the audit period, considering below:

- The extent to which the Project has been altered to that assessed and approved in the EIS and RtS during the audit period
- Incidents and non-compliance during the audit period
- Complaints during the audit period
- Compliance with the Project Approval during the audit period
- Review of key scope consultation issues and area of concerns, and
- High -level assessment of adequacy and implementation of post approval documents.

Qualitative assessment findings are summarised below:

- SSI-10051-Modification 1 (MOD 1) was approved on 14<sup>th</sup> April 2022 and amends Condition E4 to reduce the biodiversity offset credit requirement.
- Four Environmental Reviews (ERs) were determined by Sydney Metro during the audit period and have been considered during the audit (refer **Section 1.1.3** for details). The proposed changes were deemed to be consistent with the EIS and Submissions Report.
- Refer to **Section 4.5** for incidents and non-compliances recorded within the audit period.
- Refer to **Section 4.4** for complaints recorded within the audit period.
- Compliance with the project approval is tracked on an ongoing basis by the Sydney Metro and Contractor Environment Teams. Compliance tracking at a high level is included in a Compliance Tracking Register. The ER has also been engaged and provides support in the management of compliance with the planning approval, and reports monthly to DPHI as required. The project prepared the Six-Monthly Noise and Vibration Monitoring Report, covering the period up to February 2024. Annual reporting timeframes for Air Quality, Groundwater and Surface Water monitoring were due at the time of IA2 and should cover the monitoring period from 8 August 2023 to 8 August 2024. The Draft reports were not available for review at the time of this audit. It is also noted that the Groundwater Monitoring Program was not included as an appendix to the SWMP on the project website and remained under review at the time of the audit.
- The Auditor consulted with DPHI on 8 July 2024 to obtain input on the scope of the Independent Audit in accordance with Section 3.2 of the IAPAR. DPHI responded on 24 July 2024 and requested that the NSW EPA, Liverpool and Penrith City Councils also be consulted. Councils and EPA were consulted on 25 July 2024 to provide input to the scope and confirm any key issues they would like examined, relating to post-approval requirements and compliance. A summary of the key issues and areas of focus raised by stakeholders during consultation is presented in **Table 2**. Refer to **Section 4.6** and consultation records are presented in **Attachment 4**. The Audit Table in **Attachment 1** includes audit evidence and findings in relation to each applicable condition.
- Refer **Section 4.3** for a high -level assessment of the adequacy and implementation of post approval documents.

## 4.7 Environmental Performance

The environmental performance of the Project during the audit period was considered by the Auditor to be high. Refer to the following **positive observations**:

- The recycled water wheel wash and hardstand access at the St Marys station site was well maintained with no sediment observed on the site surface, or visible tracking from the Heavy Vehicle access to public roads.
- The strategic placement of noise blankets around the station box and along gaps in site hoarding, reducing noise impact to surrounding residents.
- Proactivity in repair of potholes on Kent Road, Orchard Hills, which has been a potential issue of concern identified by DPHI.
- Process in place for the management of potential cumulative impacts from other SM-WSA projects operating concurrently with SSTOM.
- Implementation of the Out of Hours Works (OOHW) process including preparation of Detailed Noise and Vibration Impact Statements (DNVIS') and OOHW Approvals, e.g. Oversized deliveries & Concrete works at Orchard Hills & Earthworks at the Stabling and Maintenance Facility (SMF).
- The identification of potential inconsistencies with the EIS and early preparation of Environmental Reviews, e.g. Kent Road Watermain and Lansdowne & Samuel Marsden Roads sewer main works.

Further assessment of environmental performance has been documented using photos, observations and notes from the site inspection. Refer **Section 6**.

## 5. AUDIT CONCLUSIONS

This Audit Report presents the findings from the 6<sup>th</sup> Independent Audit conducted for the SM-WSA project, and the 2<sup>nd</sup> IEA conducted for SSTOM, covering the period from 13<sup>th</sup> February to 14<sup>th</sup> August 2024.

In summary, a total of **222 conditions** were assessed. **Three non-compliances** were identified, two of which had been self-reported by the Project during the audit period. **11 Observations** with recommendation for improvement were identified. Positive observations have been reported in **Section 4.7** of this audit report and in commentary documented throughout the audit.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents (management plans, procedures, strategies and construction monitoring programs) that formed a part of the Audit Scope. The level of implementation of these requirements on site was also observed as high.

The Auditor would like to thank the Auditees from Sydney Metro and the contractor, Parklife Metro for their organisation, cooperation and support during the audit.

## 6. SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS

### ST. MARY'S STATION



**Photo 1:** A tower crane had been set-up at St Mary's. As a result of a noise assessment, shrouding for the crane had been ordered to reduce potential impacts to surrounding residents



**Photo 2:** Expired parking restriction signage observed near the St. Mary's Station worker car park (dated 13<sup>th</sup> July) - recommended for removal



**Photos 3 & 4:** Implementation of the Worker Car Parking Strategy including worker car park and parking restrictions for workers signposted at the St. Mary's site





**Photos 5 & 6:** St Mary's Water Treatment Plant (WTP) with bundled IBCs of treatment chemicals. Discharge from the WTP is to sewer under a Trade Waste Agreement (TWA) with Sydney Water. The CEMP and relevant Sub-plans have been recommended for update to identify the TWA and relevant conditions for implementation, including water quality monitoring.



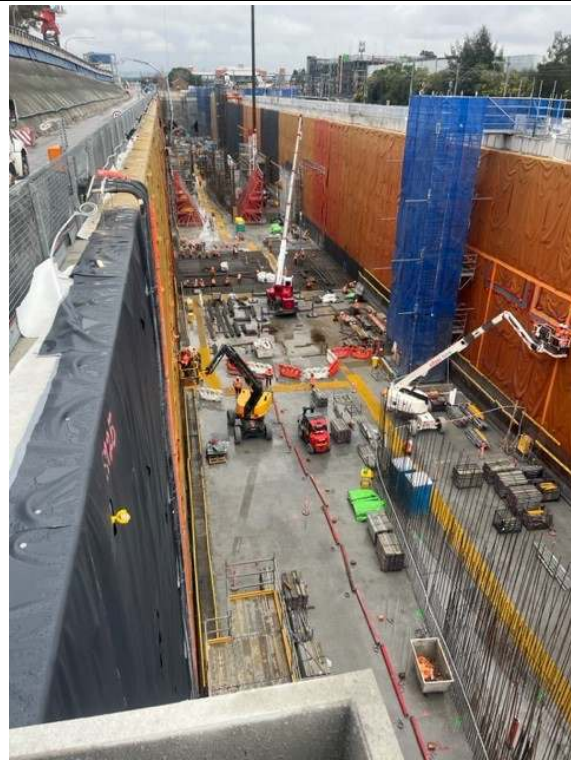
**Photo 7:** Compliant diesel storage (labelled and self-bunded) for tower cranes



**Photo 8:** Stockpiled VENM excavated for station box sump in designated bay. No tracking or sediment on surrounding hardstand observed.



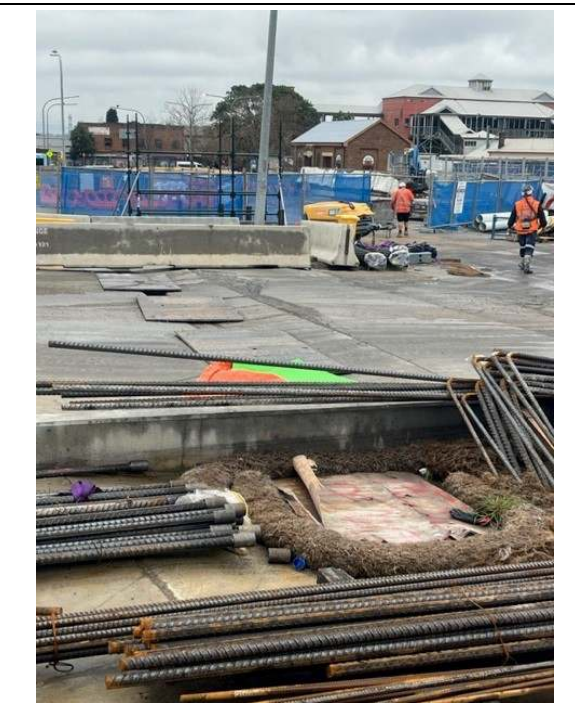
**Photo 9:** Noise blankets installed at top of batter on hoarding to reduce noise impact to surrounding residents.



**Photos 10 & 11:** Form Reo Pour (FRP) and waterproofing were underway inside the station box. Dewatering from sumps to the WTP. Groundwater monitoring remained the responsibility of the SBT contractor at the time of the audit and the SSTOM Groundwater Monitoring Program was undergoing review.



**Photo 12:** A concrete pour to the station box was underway

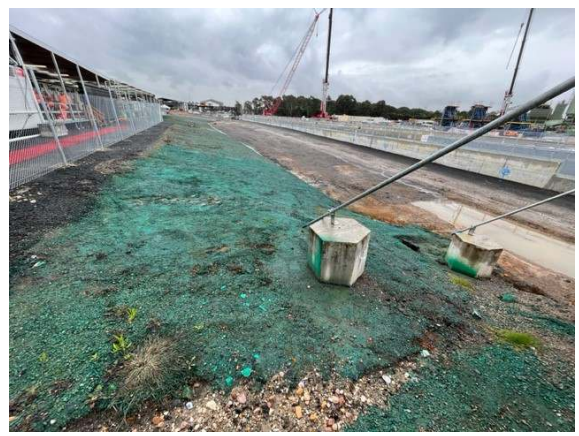


**Photo 13:** Protected stormwater inlet observed – discharge to a sump on the neighbouring site



Photos 14 & 15: Wheel wash in place on hardstand site access, utilising recycled water. No tracking or sediment build-up observed.

### ORCHARD HILLS STATION



Photos 16 & 17: Polymer application and geofabric observed on batters to reduce dust and erosion risk



Photos 18 & 19: Generator relocation underway after identified non-compliance with NMLs



**Photo 20:** Internal haul roads were muddy and further stabilisation measures should be applied to reduce the risk of tracking (it is noted that works were on hold at the time of the audit due to wet weather)



**Photo 21:** The Boral concrete batching plant remained under Construction



**Photo 22:** Northern sediment basin – Water reused for dust suppression or trucked to the St. Mary’s WTP



**Photo 23:** Boral concrete batching plant sediment basin – Water for reuse



**Photo 24:** SE Sediment Basin – Water collected from across the site is pumped via rock-lined channels to the M7 Sediment Basin prior to discharge to Blaxland Creek via the EPL licenced discharge point. **NB:** There was no access to the M7 sediment basin during the audit due to wet weather WHS restrictions.



**Photos 25-28:** The cattle grid at the Heavy Vehicle access onto Lansdowne Road was filled with sediment-laden water, which was flowing through deteriorated controls onto the nature strip and down the road. Stormwater inlets were not observed due to no kerb and gutter. Refer to **Attachment 1, Condition 128** for recommendations.



Photo 29: A review of signage at all SSTOM sites for compliance with Condition A47 has been recommended

# Independent Environmental Audit Report

Sydney Metro

Western Sydney Airport (SSI 10051)

Stations, Systems, Trains, Operations and Maintenance (SSTOM)

Attachment 1: Independent Audit Table

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>PART A ADMINISTRATIVE CONDITIONS</b>				
<b>GENERAL</b>				
A1	The Proponent must carry out the CSSI in accordance with the terms of this approval and generally in accordance with the: (a) Sydney Metro – Western Sydney Airport Environmental Impact Statement dated 21 October 2020; and (b) Sydney Metro – Western Sydney Airport Submissions Report submitted April 2021.	<ul style="list-style-type: none"> <li>• Sydney Metro - Western Sydney Airport Environmental Impact Statement (WSA EIS), dated October 2020 (the EIS)</li> <li>• Sydney Metro WSA Submissions Report, submitted April 2021</li> <li>• Sydney Metro WSA Response to Submissions Report (RIS), dated December 2020</li> <li>• Sydney Metro WSA Modification 1 – Biodiversity Credits (SSI-10051-MOD-1) Modification Assessment Report, DPHI 2022</li> <li>• Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 1), determined 14 April 2022</li> <li>• Environmental Review ER 001 - Aerotropolis Overland Pipeline for Water Treatment Plant Discharges – AEC, approved 12/3/2024</li> <li>• Environmental Review ER 002 - Kent Road Watermain, approved 27/3/2024</li> <li>• Environmental Review ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main, approved 29/4/2024</li> <li>• Environmental Review ER 004 - SWD Survey works (alignment wide), approved 7/6/2024</li> </ul>	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout. Refer also to the review of the Sydney Metro WSA Modification 1 – Biodiversity Credits (SSI-10051-MOD-1) Modification Assessment Report, DPHI 2022, as well as Environmental Reviews prepared during the audit period in the body of the audit report. There were no Consistency Assessments approved during the audit period.  There were four Environmental Reviews prepared and approved during the audit period: <ul style="list-style-type: none"> <li>• ER 001 - Aerotropolis Overland Pipeline for Water Treatment Plant Discharges – AEC, approved 12/3/2024</li> <li>• ER 002 - Kent Road Watermain, approved 27/3/2024</li> <li>• ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main, approved 29/4/2024</li> <li>• ER 004 - SWD Survey works (alignment wide), approved 7/6/2024</li> </ul>
A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in <b>Condition A1</b> unless otherwise specified in, or required under, this approval.	• Refer evidence throughout this audit table	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout.
A3	In the event of an inconsistency between: (a) the terms of this approval and any document listed in <b>Condition A1</b> inclusive, the terms of this approval will prevail to the extent of the inconsistency; and (b) any document listed in <b>Condition A1</b> inclusive, the most recent document will prevail to the extent of the inconsistency. <b>Note:</b> 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.	<ul style="list-style-type: none"> <li>• Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>• ER 001 - Aerotropolis Overland Pipeline for Water Treatment Plant Discharges – AEC, approved 12/3/2024</li> <li>• ER 002 - Kent Road Watermain, approved 27/3/2024</li> <li>• ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main, approved 29/4/2024</li> <li>• ER 004 - SWD Survey works (alignment wide), approved 7/6/2024</li> </ul>	C	Potential inconsistencies were assessed by the Environmental Review process. There were four Environmental Reviews prepared and approved during the audit period: <ul style="list-style-type: none"> <li>• ER 001 - Aerotropolis Overland Pipeline for Water Treatment Plant Discharges – AEC, approved 12/3/2024</li> <li>• ER 002 - Kent Road Watermain, approved 27/3/2024</li> <li>• ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main, approved 29/4/2024</li> <li>• ER 004 - SWD Survey works (alignment wide), approved 7/6/2024</li> </ul>
A4	In the event that there are differing interpretations of the conditions of this approval, including in relation to a condition of this approval, the Planning Secretary's interpretation is final.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2024	NT	No differing interpretations of the conditions of approval are known to have arisen during the audit period.
A5	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to: (a) the environmental performance of the CSSI; (b) any document or correspondence in relation to the CSSI; (c) any notification given to the Planning Secretary under the terms of this approval; (d) any audit of the construction or operation of the CSSI; (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.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2024	NT	The Auditees confirmed there were no written directions received from the Planning Secretary during the audit period.
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: (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; (c) documentation of the follow-up with the identified party(s) where feedback has not been provided to confirm that the party(s) has none or has failed to provide feedback after repeated requests; (d) outline of the issues raised by the identified party(s) and how they have been addressed; and (e) description of the outstanding issues raised by the identified party(s) and the reasons why they have not been addressed.	<ul style="list-style-type: none"> <li>• Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>• Interview with ER, 19/8/2024</li> </ul>	C	As per conditions requiring consultation throughout this audit table, including in relation to monitoring programs and document review. Monitoring programs have been incorporated into CEMP Sub-plans and were approved by DPHI prior to the audit period.
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.	• Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023	C	Approval for SSI-10051 was granted on 23/7/2021. Notifications of commencement of construction were submitted to DPHI (as per Conditions A34 & A35) for each stage. The Notification of Commencement of Construction for SSTOM was dated 1/8/2023 for commencement on 8/8/2023 and was within the five year commencement requirement.
A8	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Australian Standards or policies in the form they are in as at the date of this approval.	• SSI-10051 Approval, dated 23/7/2021	C	Noted.
A9	Any document that must be submitted or action taken within a timeframe specified in or under the conditions of this approval may be submitted or undertaken within a later timeframe agreed with the Planning Secretary. This condition does not apply to the written notification required in respect of an incident under <b>Condition A41</b> .	• Interview with Sydney Metro & ParkLife Metro, 15/08/2024	C	As per the findings from this audit.



<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2 WSA SSTOM August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>STAGING</b>				
A10	The CSSI may be constructed and operated in stages. Where staged construction and/or operation is proposed, a <b>Staging Report</b> must be prepared. The <b>Staging Report</b> must be submitted to the Planning Secretary for information no later than one (1) month before the lodgement of any <b>CEMP</b> or <b>CEMP sub plan</b> for the first of the proposed stages of construction (or if only staged operation is proposed, one (1) month before the commencement of operation of the first of the proposed stages of operation), unless otherwise agreed with the Planning Secretary.	<ul style="list-style-type: none"> <li>Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024</li> <li>Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023</li> <li>SSI-10051, Independent Audit No.1 – Audit Report (SSTOM only), GHD, April 2024 (WSA IEA Independent Audit No. 5 (IA5), 17/4/2024</li> </ul>	C	The initial preparation of the Staging Report, ER Endorsement and submission was not within the audit period. The initial Independent Environmental Audit (IEA) for STTOM, SM-WSA SSTOM IA1 verified compliance with Condition A10. Commencement of Construction for SSTOM was notified to DPHI as 8/8/2023 (in letter dated 1/8/2023). As verified during IA1, the Staging Report Rev9 was submitted to DPHI via the Major Projects portal prior to commencement of Construction of the SSTOM stage of works.
A11	The <b>Staging Report</b> must: <ol style="list-style-type: none"> <li>set out how construction of the whole of the CSSI will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish;</li> <li>if staged operation is proposed, set out how the operation of the whole of the CSSI will be staged, including details of each stage and the general timing of when operation of each stage will commence;</li> <li>specify conditions that apply to each stage of construction and operation including how compliance with conditions will be achieved across and between each of the stages of the CSSI;</li> <li>set out mechanisms for managing any cumulative impacts arising from the proposed staging; and</li> <li>for the purposes of informing <b>Conditions C2, C7 and C17</b>, include an assessment of the predicted level of environmental risk and potential level of community concern posed by the construction activities required to construct each stage of the CSSI.</li> </ol> <p>With respect to (e) above, the risk assessment must use an appropriate process consistent with AS/NZS ISO 31000: 2018, Risk Management - Guidelines and must be endorsed by the ER.</p> <p>Note:</p> <ol style="list-style-type: none"> <li>A Staging Report may reflect the staged construction and operation of the project through geographical activities, temporal activities or activity-based staging.</li> <li>The risk matrix must reflect the stages of construction identified in the Staging Report</li> </ol>	<ul style="list-style-type: none"> <li>Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024</li> <li>ER Endorsement of the SMWSA Staging Report Rev8, dated 28/2/2023</li> </ul>	C	The Staging report addresses each part (a) - (e) of Condition A11, as set out in the Staging Report compliance table, verified during the audit, and allocation of conditions of approval is included in the Staging Report. The allocation of conditions to SSTOM in the Staging Report has been used to determine the scope for this audit. ER Endorsement of the Staging Report Rev08 was provided as evidence and included reference to endorsement of the risk assessment associated with the Staging Report as per Condition A11(e).
A12	The CSSI must be staged in accordance with the <b>Staging Report</b> , and submitted for information to the Planning Secretary.	<ul style="list-style-type: none"> <li>Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024</li> <li>Letter from Sydney Metro to DPHI RE: Sydney Metro Western Sydney Airport (SMWSA) – Condition of Approval A14 - Submission of revised SMWSA CSSI 10051 Staging Report (Rev 10) for information, dated 28/5/2024</li> <li>Post Approval Form_20240528041018 (SSI-10051-PA-427), WSA CSSI 10051 Staging Report (Rev 10), dated 28/5/2024</li> <li>Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024</li> </ul>	C	Letter from DPHI RE: WSA Staging Report Rev10, dated 28/5/2024 refers to the Staging Report Rev10, dated 22/5/2024 and submitted to DPHI for information on 28/5/2024. The Staging Report Revision 10 was revised to include the following: <ul style="list-style-type: none"> <li>Minor update to definitions and abbreviations</li> <li>Correctional update to Appendix B (Applicability of SMWSA CoA to each project stage) regarding CoA E13</li> <li>Correctional update to Appendix D (Applicability of SMWSA REMM to each project stage) regarding NAH8, OHYD4, OWQ4.</li> </ul> <p>There were no non-compliances with implementation of the Staging Report identified during the audit.</p>
A13	Where staging is proposed, the terms of this approval that apply or are relevant to the work or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	<ul style="list-style-type: none"> <li>Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024</li> </ul>	C	SSTOM, and allocation of conditions of approval is included in the Staging Report. The allocation of conditions to SSTOM has been used to determine the scope of this audit. <p><i>Note: The allocation of conditions was discussed during the audit interview with Sydney Metro and ParkLife Metro on 15/8/2024, and included discussion of future allocation for conditions related to tree removal (E11 &amp; E12) and key fish habitat (E8-E10), that may become relevant for SSTOM later in the project (due to allocation of species credit (Condition E4) and proposed creek crossings).</i></p>
A14	Where changes are proposed to the staging of construction or operation, a revised <b>Staging Report</b> must be prepared and submitted to the Planning Secretary for information before the commencement of changes to the stage of construction or the stage of operation.	<ul style="list-style-type: none"> <li>Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024</li> <li>Letter from Sydney Metro to DPHI RE: Sydney Metro Western Sydney Airport (SMWSA) – Condition of Approval A14 - Submission of revised SMWSA CSSI 10051 Staging Report (Rev 10) for information, dated 28/5/2024</li> <li>Post Approval Form_20240528041018 (SSI-10051-PA-427), WSA CSSI 10051 Staging Report (Rev 10), dated 28/5/2024</li> <li>Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024</li> </ul>	C	Letter from DPHI RE: WSA Staging Report Rev10, dated 28/5/2024 refers to the Staging Report Rev10, dated 22/5/2024 and submitted to DPHI for information on 28/5/2024. The Staging Report Revision 10 was revised to include the following: <ul style="list-style-type: none"> <li>Minor update to definitions and abbreviations</li> <li>Correctional update to Appendix B (Applicability of SMWSA CoA to each project stage) regarding CoA E13</li> <li>Correctional update to Appendix D (Applicability of SMWSA REMM to each project stage) regarding NAH8, OHYD4, OWQ4.</li> </ul>
A15	Where changes are proposed to the risk assessment related to the staging of construction or operation, a revised <b>Staging Report</b> must be submitted to the Planning Secretary for information one (1) month before the lodgement of any <b>CEMP</b> or <b>CEMP sub plan</b> associated with the stage where change in risk assessment is proposed.	<ul style="list-style-type: none"> <li>Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024</li> <li>Letter from Sydney Metro to DPHI RE: Sydney Metro Western Sydney Airport (SMWSA) – Condition of Approval A14 - Submission of revised SMWSA CSSI 10051 Staging Report (Rev 10) for information, dated 28/5/2024</li> <li>Post Approval Form_20240528041018 (SSI-10051-PA-427), WSA CSSI 10051 Staging Report (Rev 10), dated 28/5/2024</li> <li>Letter from DPHI RE: WSA Staging Report Rev10, dated 3/7/2024</li> </ul>	C	Strategies, plans and programs have been submitted as per the SSTOM project described in the Staging Report. Rev 10 of the Staging Report was updated to include the following: <ul style="list-style-type: none"> <li>Minor update to definitions and abbreviations</li> <li>Correctional update to Appendix B (Applicability of SMWSA CoA to each project stage) regarding CoA E13</li> <li>Correctional update to Appendix D (Applicability of SMWSA REMM to each project stage) regarding NAH8, OHYD4, OWQ4.</li> </ul>
A16	The Proponent may submit any strategies, plans or programs required by this approval on a progressive basis, within each stage of the CSSI. <p><b>Notes:</b></p> <ol style="list-style-type: none"> <li>While any strategy, plan or program may be submitted on a progressive basis, the Proponent will need to ensure that the existing activities on site are covered by suitable strategies, plans or programs at all times; and</li> <li>If the submission of any strategy, plan or program is to be submitted on a progressive basis, then the relevant strategy, plan or program must clearly describe the activities to which the strategy, plan or program applies, the relationship of this activity to any future activities within the stage, and the trigger for updating the strategy, plan or program.</li> <li>The staged submission of strategies, plans or programs may reflect the construction and operation of the project through geographical activities, temporal activities or activity-based staging.</li> </ol>	<ul style="list-style-type: none"> <li>Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024</li> </ul>	C	Strategies, plans and programs have been submitted as per the SSTOM project described in the Staging Report. Rev 10 of the Staging Report was updated to include the following: <ul style="list-style-type: none"> <li>Minor update to definitions and abbreviations</li> <li>Correctional update to Appendix B (Applicability of SMWSA CoA to each project stage) regarding CoA E13</li> <li>Correctional update to Appendix D (Applicability of SMWSA REMM to each project stage) regarding NAH8, OHYD4, OWQ4.</li> </ul> <p>Refer to Audit Table Part C for submission of CEMP and Sub-plans and timing verification.</p>
<b>ANCILLARY FACILITIES</b>				
Ancillary Facilities				

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A17	<p>Ancillary facilities that are not identified by description and location in the documents listed in <b>Condition A1</b> can only be established and used in each case if:</p> <p>(a) they are located within or immediately adjacent to the Construction Boundary of the CSSI; and</p> <p>(b) they are not located next to sensitive land use(s) (including where an access road is between the facility and the receiver), unless the landowner and occupier have given written acceptance to the carrying out of the relevant facility in the proposed location; and</p> <p>(c) they have no impacts on Heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and</p> <p>(d) the establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts.</p> <p><i>Note: This condition does not apply to any ancillary facilities or work that are exempt or complying development, established before the commencement of construction under this approval or minor ancillary facilities established under <b>Condition A22</b>.</i></p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Construction Environment Management Plan (CEMP), SSTOM, Rev 01 19/7/2024</li> </ul>	NT	<p>The following Ancillary Facilities are listed for proposed use in Section 1.5 of the CEMP:</p> <ul style="list-style-type: none"> <li>St Marys</li> <li>Claremont Meadows</li> <li>Orchard Hills</li> <li>Stabling and Maintenance Facility</li> <li>Luddenham Road</li> <li>Elizabeth Drive</li> <li>Bringelly</li> <li>Aerotropolis</li> </ul> <p>As per Section 1.7 of the CEMP, "where the proposed ancillary facility complies with Condition A17, this CEMP will be updated to include the ancillary facility, in accordance with Condition C3, the revised CEMP will be submitted to the ER for review and endorsement prior to establishment of the respective ancillary facility".</p> <p>There were no SSTOM A17 Ancillary Facility Assessments approved during the audit period.</p> <p>No A17 AFs are known to have been established during the project.</p>
<b>SITE ESTABLISHMENT WORK</b>				
<b>Site Establishment Management Plan</b>				
A18	<p>Before establishment of any ancillary facility (excluding exempt or complying development, minor ancillary facilities determined by the ER to have minimal environmental impact and those established under <b>Condition A22</b> and those considered in an approved CEMP), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the ancillary facilities. The Site Establishment Management Plan must be prepared in consultation with the Relevant Council(s) and relevant government agencies. The Site Establishment Management Plan must include:</p> <p>(a) a description of activities to be undertaken during establishment of the ancillary facility (including scheduling and duration of work to be undertaken at the site);</p> <p>(b) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s);</p> <p>(c) a program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of site establishment work;</p> <p>(d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to:</p> <p>(i) meet the performance outcomes stated in the documents listed in Condition A1; and</p> <p>(ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and</p> <p>(e) a program for monitoring the performance outcomes, including a program for construction noise monitoring, where appropriate or required.</p> <p>Nothing in this condition prevents the Proponent from preparing individual <b>Site Establishment Management Plans</b> for each ancillary facility.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Construction Environment Management Plan (CEMP), SSTOM, Rev 01 19/7/2024</li> </ul>	NT	<p>There were no Site Establishment Management Plans prepared for SSTOM under Condition A18 during the project.</p> <p>The following Ancillary Facilities are listed for proposed use in Section 1.5 of the CEMP:</p> <ul style="list-style-type: none"> <li>St Marys</li> <li>Claremont Meadows</li> <li>Orchard Hills</li> <li>Stabling and Maintenance Facility</li> <li>Luddenham Road</li> <li>Elizabeth Drive</li> <li>Bringelly</li> <li>Aerotropolis</li> </ul> <p><b>Observation 1:</b> The process for preparation of Site Establishment Management Plans under Condition A18 has not been addressed in the CEMP.</p> <p><b>Recommendation:</b> Review and update the CEMP to include the process for preparation of Site Establishment Management Plans under Condition A18.</p>
A19	<p>With the exception of a <b>Site Establishment Management Plan</b> expressly nominated by the Planning Secretary to be endorsed by the ER, all <b>Site Establishment Management Plans</b> must be submitted to the Planning Secretary for approval one (1) month before the establishment of any ancillary facilities.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	<p>There were no Site Establishment Management Plans prepared for SSTOM under Condition A18 during the project.</p>
A20	<p>A <b>Site Establishment Management Plan</b> expressly nominated by the Planning Secretary to be endorsed by the ER must be submitted to the ER for endorsement one (1) month before the establishment of that ancillary facility or as otherwise agreed with the ER.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	<p>There were no Site Establishment Management Plans prepared for SSTOM under Condition A18 during the project.</p>
<b>Use of Ancillary Facilities</b>				
A21	<p>The use of ancillary facility for construction must not commence until the CEMP required by <b>Condition C1</b> relevant <b>CEMP Sub-plans</b> required by <b>Condition C5</b> and relevant <b>Construction Monitoring Programs</b> required by <b>Condition C13</b> have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable).</p> <p><i>Note: This condition does not apply to <b>Condition A22</b> or where the use of an ancillary facility is Low Impact Work or for Low Impact Work.</i></p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	C	<p>There were no new construction ancillary facilities approved for use during the audit period, with the exception of Minor Ancillary Facilities (MAFs) established under Condition A22. Refer to Condition A22 for details.</p> <p>Some ancillary facilities proposed for use by SSTOM were established by other SM-WSA Contracts including SCAW and SBT, and in these cases use commenced prior to SSTOM project commencement.</p>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Minor Ancillary Facilities</b>				
A22	Lunch sheds, office sheds, portable toilet facilities and the like, can be established and used where they have been assessed in the documents listed in <b>Condition A1</b> or satisfy the following criteria: (a) are located within or adjacent to the Construction Boundary; and (b) have been assessed by the ER to have - (i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the ICNG, traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts; and (ii) minimal environmental impact with respect to waste management and flooding, and (iii) no impacts on biodiversity, soil and water, and Heritage items beyond those already approved under other terms of this approval.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024 &amp; 29/8/2024</li> <li>Interview with ER, 19/8/2024 &amp; 6/9/2024</li> <li>A22 Minor Ancillary Facilities Checklist_Luddenham Station, endorsed by (Env Mgr), dated 29/7/2024</li> <li>A22 Minor Ancillary Facilities Checklist_SSTOM Orchard Hills Station Site, endorsed by (Env Mgr), dated 8/7/2024</li> <li>A22 Minor Ancillary Facilities Checklist_SSTOM Stabling and maintenance facility, endorsed by (Env Mgr), dated 12/7/2024</li> <li>A22 Minor Ancillary Facilities Checklist_St Marys Station Site, endorsed by (Env Mgr), dated 17/5/2024</li> <li>A22 Minor Ancillary Facilities Checklist_Bradfield Station Site, endorsed by (Env Mgr), dated 10/7/2024</li> <li>Site inspection, 14/08/2024</li> </ul>	C	<p>Five Minor Ancillary Facilities (MAFs) were endorsed by the ParkLife Environment Manager for use during the audit period. MAF Assessments were undertaken and provided for review during the audit as follows:</p> <ul style="list-style-type: none"> <li>A22 Minor Ancillary Facilities Checklist_St Marys Station Site, endorsed by (Env Mgr), dated 17/5/2024</li> <li>A22 Minor Ancillary Facilities Checklist_SSTOM Orchard Hills Station Site, endorsed by (Env Mgr), dated 8/7/2024</li> <li>A22 Minor Ancillary Facilities Checklist_Bradfield Station Site, endorsed by (Env Mgr), dated 10/7/2024</li> <li>A22 Minor Ancillary Facilities Checklist_SSTOM Stabling and maintenance facility (SMF), endorsed by (Env Mgr), dated 12/7/2024</li> <li>A22 Minor Ancillary Facilities Checklist_Luddenham Station, endorsed by (Env Mgr), dated 29/7/2024</li> </ul> <p>The project has determined that the above-listed MAFs are located in areas already assessed by the documents listed in <b>Condition A1</b> (i.e. within the project boundary and identified as indicative office and amenities locations in the EIS). Maps in the EIS, Chapter 8 Project Description (e.g. Figure 8-11) and Table 8-3 set out indicative office &amp; amenities locations.</p> <p>It is noted that PLM conducted the above-listed MAF assessments as a due diligence process only and self-approved, providing a copy of the checklist to the ER for information.</p> <p>Assessment by the ER is understood to only be required where agreed the MAFs have not already been assessed in the EIS or Submissions Report.</p> <p>It was agreed amongst auditees that establishment of the facilities described under A22 has been of low environmental-risk to date (due to the nature and location of the facilities), though the process should be more formally confirmed and agreed prior to future implementation to ensure all potential impacts are assessed.</p> <p><b>Observation 2:</b> It is understood that the above MAFs were established at the beginning of the project, prior to preparation of the MAF Assessment checklists.</p> <p><b>Observation 3:</b> The adopted 'due diligence' process for A22 MAFs has not been described in the CEMP.</p> <p><b>Recommendation:</b> Review the A22 process, including proposed due diligence assessment with the ER. Ensure the process is documented and agreed with all parties prior to future implementation. If continued, ensure due diligence assessments are conducted prior to implementation of the activity.</p>
<b>Boundary screening</b>				
A23	Boundary screening must be erected around ancillary facilities that are adjacent to sensitive land use(s) for the duration that the ancillary facility is in use unless otherwise agreed with relevant affected residents, business operators or landowners.	Site inspection, 14/08/2024 (St Marys Station & Orchard Hills Station)	C	<p>Sites inspected during the audit (i.e. St Marys and Orchard Hills stations) were predominantly surrounded by hoarding and Sydney Metro branding.</p> <p><b>Note:</b> Boundary screening did not extend around the rear of the Orchard Hills site, though was screened naturally by a stand of vegetation and a low earth bund. It is understood that additional visual screening and noise abatement measures are planned for the Orchard Hills site to further mitigate impacts in anticipation of the Boral concrete batching plant, e.g. shipping containers around the rear site boundary.</p>
A24	Boundary screening required under <b>Condition A23</b> must minimise visual impacts on adjacent sensitive land use(s).	Site inspection, 14/08/2024 (St Marys Station & Orchard Hills Station)	C	As per Condition A23.
<b>INDEPENDENT APPOINTMENTS</b>				
A25	All Independent Appointments required by the terms of this approval must have regard to the Department's guideline Seeking approval from the Department for the appointment of independent experts (DPIE, 2020) and hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> <li>Interview with ER, 19/8/2024</li> <li>DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023</li> </ul>	C	DPHI has approved the independent appointment of the ER for the project. Supporting letter from HBI includes details of ER experience and suitability. The Complaints Mediator (not activated for SSTOM) was appointed previously.
A26	The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions. The Proponent must: (a) facilitate and assist the Planning Secretary in any such audit; and (b) make it a term of their engagement of an Independent Appointment that the Independent Appointment facilitate and assist the Planning Secretary in any such audit.	Interview with Sydney Metro & ParkLife Metro, 15/08/2024	NT	A DPHI audit of an Independent Appointment is not known to have occurred during the audit period.
A27	Upon completion of an audit under <b>Conditions A26</b> above, the Planning Secretary may withdraw its approval of an Independent Appointment should they consider the Independent Appointment has not exercised their functions in accordance with this approval. <b>Note: Conditions A26 and A27 apply to all Independent Appointments including the ER and Independent Auditor.</b>	Interview with Sydney Metro & ParkLife Metro, 15/08/2024	NT	The auditor is not aware of any formal withdrawals of independent appointments by DPHI during the audit period.
<b>ENVIRONMENT REPRESENTATIVE</b>				
A28	Work must not commence until an Environmental Representative (ER) has been nominated by the Proponent and approved by the Planning Secretary.	<ul style="list-style-type: none"> <li>DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023</li> <li>Post Approval Form_20230321040318 (SSI-10051-PA-197), Approval of Additional ER, submitted 21/3/2023</li> </ul>	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Supporting letter from HBI includes details of ER experience and suitability. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan". Approval of the Initial ER and Alternate ER Appointments was not within the audit period.
A29	The proposed ER must be a suitably qualified and experienced person(s) who was not involved in the preparation of the documents listed in <b>Condition A1</b> , and is independent from the design and construction personnel for the CSSI and those involved in the delivery of it.	DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Supporting letter from HBI includes details of ER experience and suitability. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan". Approval of the Initial ER and Alternate ER Appointments was not within the audit period.

<b>Item</b>	
<b>Project Name:</b>	SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b>	ParkLife Metro / Sydney Metro
<b>Auditor:</b>	Morasey Environment Pty Ltd
<b>Audit Details:</b>	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.</b>	MESYM 2024105-01 Sydney Metro IEA2 WSA SSTOM August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A30	The Proponent may engage more than one ER for the CSSI, 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 CSSI.	<ul style="list-style-type: none"> <li>DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023</li> </ul>	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan".
A31	The ER must meet the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).	<ul style="list-style-type: none"> <li>DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023</li> <li>Letter from HBI RE: Additional Environmental Representative Resource to PSC No. 00013/11898_WSA, dated 9/3/2022</li> </ul>	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Letter notes "The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan". Letter from HBI RE: Additional Environmental Representative Resource to PSC No. 00013/11898_WSA, dated 9/3/2022 includes statements and CV of ER Brett McLennan and supporting evidence of meeting the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).
A32	<p>For the duration of the work until the commencement of operation, or as agreed with the Planning Secretary, the approved ER must:</p> <p>(a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI;</p> <p>(b) consider and inform the Planning Secretary on matters specified in the terms of this approval;</p> <p>(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;</p> <p>(d) review documents identified in <b>Conditions A10, A18, A20, C1, C5 and C13</b> and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so:</p> <p>(i) endorse the documents before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or</p> <p>(ii) endorse the documents before the implementation of such documents (if those documents are only required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary / Department);</p> <p>(iii) provide a written statement to the Planning Secretary advising the documents have been endorsed.</p> <p>(e) for documents that are required to be submitted to the Planning Secretary / Department for information under (d)(i) above, the documents must be submitted as soon as practicable to the Planning Secretary / Department after endorsement by the ER, unless otherwise agreed by the Planning Secretary;</p> <p>(f) regularly monitor the implementation of the documents listed in <b>Conditions A10, A18, A20, C1, C5 and C13</b> to ensure implementation is being carried out in accordance with the document and the terms of this approval;</p> <p>(g) as may be requested by the Planning Secretary, help plan or attend audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under <b>Condition A36</b>;</p> <p>(h) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints received directly by the Department;</p> <p>(i) consider or assess the impacts of minor ancillary facilities as required by <b>Condition A22</b>; and</p> <p>(j) consider any minor amendments to be made to the <b>Site Establishment Management Plan, CEMP, CEMP Sub-plans</b> and construction monitoring programs without increasing impacts to nearby sensitive land use(s), and are consistent with the terms of this approval and the <b>Site Establishment Management Plan, CEMP, CEMP Sub-plans</b> and construction monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval;</p> <p>(k) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an <b>Environmental Representative Monthly Report</b> providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports". 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 CSSI or as otherwise agreed by the Planning Secretary; and</p> <p>(l) assess the impacts of activities as required by the <b>Low Impact Work</b> definition.</p>	<ul style="list-style-type: none"> <li>Interview with ER, 19/8/2024</li> <li>Sydney Metro WSA ER Monthly Report March 2024, dated 7/4/2024</li> <li>Sydney Metro WSA ER Monthly Report April 2024, dated 7/5/2024</li> <li>Sydney Metro WSA ER Monthly Report May 2024, dated 7/6/2024</li> <li>Sydney Metro WSA ER Monthly Report June 2024, dated 5/7/2024</li> <li>Sydney Metro WSA ER Inspection Report, dated 27/2/2024</li> <li>Sydney Metro WSA ER Inspection Report, dated 28/3/2024</li> <li>Sydney Metro WSA ER Inspection Report, dated 10/4/2024</li> <li>Sydney Metro WSA ER Inspection Report, dated 23/4/2024</li> <li>Sydney Metro WSA ER Inspection Report, dated 7/5/2024</li> <li>Sydney Metro WSA ER Inspection Report, dated 21/5/2024</li> <li>Sydney Metro WSA ER Inspection Report, dated 4/6/2024</li> <li>Sydney Metro WSA ER Inspection Report, dated 18/6/2024</li> <li>Sydney Metro WSA ER Inspection Report, dated 27/2/2024</li> <li>Sydney Metro WSA ER Inspection Report, dated 19/7/2024</li> <li>Sydney Metro WSA Staging Report Rev 10, 22 May 2024</li> <li>ER Endorsement of Staging Report Rev 10, 22 May 2024</li> <li>Construction Environment Management Plan (CEMP), SSTOM, Rev 01 19/7/2024</li> <li>DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> <li>ER Endorsement of CEMP Rev0.0, letter dated 27/6/2023</li> <li>ER endorsement of AQMP Rev0.0, letter dated 27/6/2023</li> <li>ER Endorsement of AQCMP Rev 0.0, dated 28/6/2023</li> <li>ER Endorsement of FFMP Rev 2.0, letter dated 27/3/2024</li> <li>ER endorsement of CWMP Rev0.0, letter dated 11/7/2023</li> <li>ER Endorsement of NAWMP Rev 0.0, letter dated 26/6/2023</li> <li>ER Endorsement of NVMP Rev 0.0, letter dated 27/6/2023</li> <li>ER Endorsement of NVCMP Rev 0.0, letter dated 28/6/2023</li> <li>ER endorsement of SWMP Rev0.0, letter dated 26/6/2023</li> <li>ER Endorsement of SWQCMP Rev 0.0, letter dated 28/6/2023</li> <li>ER Endorsement of SWQCMP Rev 0.0, letter dated 28/6/2023</li> <li>ER Endorsement of VAMP Rev 0.0, letter dated 31/7/2023</li> <li>ER Endorsement of VMP Rev 1.0, letter dated 31/7/2023</li> <li>ER Endorsement of Aboriginal Cultural Heritage Management Plan Rev 9.0</li> </ul>	C	<p>(a) No formal communication has been received from DPHI requiring ER response within the audit period.</p> <p>(b) The ER provides information to the Planning Secretary predominantly via reports and meetings. ER Monthly Reports include relevant information on incidents, non-compliances and complaints. A monthly meeting with DPHI has recently been initiated to discuss environmental issues and concerns. Quarterly meetings with DPHI and Sydney Metro are also attended by the ER.</p> <p>(c) ER recommendations are included in ER Inspection Reports, which are in the form of Corrective Actions and Improvement Opportunities related to environmental management. Fortnightly project meetings are attended by the ER with Sydney Metro &amp; PLM. The ER also holds informal meetings with PLM fortnightly.</p> <p>(d) Documents reviewed by the ER during the audit period are documented in the ER Monthly Reports.</p> <p>(e) Submission of documents to DPHI after ER endorsement was verified throughout the audit.</p> <p>(f) The implementation of the documents listed in Conditions A10, C1 and C13 is predominantly monitored during ER site inspections, which are generally fortnightly (though may be more frequent dependent on the scope of work and associated risks). The implementation of Condition A18 and A20 has not been relevant during the audit period.</p> <p>(g) There has been no request made by the Planning Secretary to the ER to assist with audits during the audit period.</p> <p>(h) There has been no request made by the Planning Secretary to the ER to assist in the resolution of community complaints during the audit period.</p> <p>(i) Five Minor Ancillary Facilities (MAFs) were provided as evidence during the audit. The MAF Assessments were provided to the ER for review but had not been reviewed at the time of the audit. Sydney Metro advised the assessments were completed for due diligence purposes only and were not required under Condition A22. <b>Refer to verification of compliance of Condition A22 for more information, Observations and Recommendations.</b></p> <p>(j) Minor amendments to the documents listed in Condition A32(j) have been approved by the ER as required.</p> <p>(k) ER Monthly reports are prepared and submitted to DPHI as required.</p> <p>(l) No low impact works were approved during the reporting period.</p> <p>ER inspections are conducted weekly-fortnightly to cover the area required. The ER reported issues have been predominantly around erosion and sediment control (ERSED) risks, noise, parking, chemical storage, and traffic management. Corrective actions are raised and tracked in SAI Global and remain open until evidence is verified.</p>
A33	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in <b>Condition A32</b> (including preparation of the ER monthly report), as well as:	<ul style="list-style-type: none"> <li>Interview with ER, 19/8/2024</li> <li>ER 001 - Aerotropolis Overland Pipeline for Water Treatment Plant Discharges – AEC, approved 12/3/2024</li> <li>ER 002 - Kent Road Watermain, approved 27/3/2024</li> <li>ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main, approved 20/4/2024</li> <li>ER 004 - SWD Survey works (alignment wide), approved 7/6/2024</li> </ul>	C	The ER advised all required information has been provided to them by the Proponent in order for them to undertake their duty, including complaints reports (weekly) and monthly complaints summaries. Environmental Reports are provided to the ER for review / information as they are prepared.

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> ██████████, Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggerred

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>NOTIFICATION OF COMMENCEMENT</b>				
A34	The Department, and relevant Councils must be notified in writing of the date of commencement of construction at least seven (7) days before the commencement of construction.	<ul style="list-style-type: none"> <li>Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024</li> <li>Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023</li> <li>Post Approval Form_20230801014014 (SSI-10051-PA-279), SSTOM Notification of Construction Commencement, 1/8/2023</li> </ul>	C	Notification of commencement of Construction for SSTOM was submitted to DPHI on 1/8/2023 for commencement date 8/8/2023, 7 days prior to commencement of Construction.
A35	If construction of the CSSI is to be staged, the Department, Liverpool City Council and Penrith City Council must be notified in writing at least seven (7) days before the commencement of each stage, of the date of the commencement of that stage.	<ul style="list-style-type: none"> <li>Email to Liverpool City Council RE: Sydney Metro - WSA: Notification of Commencement of Staged Construction (CoA A35) SSTOM, dated 1/8/2023</li> <li>Email to Penrith City Council RE: Sydney Metro - WSA: Notification of Commencement of Staged Construction (CoA A35) SSTOM, dated 1/8/2023</li> </ul>	C	Notification of commencement of Construction for SSTOM was submitted to Liverpool City Council and Penrith City Council on 1/8/2023 for commencement date 8/8/2023, 7 days prior to commencement of Construction.
<b>INDEPENDENT ENVIRONMENTAL AUDIT</b>				
A36	Independent Audits of the CSSI must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020).	DPHI Letter, Sydney Metro Western Sydney Airport (SSI-10051) – approval of independent auditors, Ref: SSI-10051-PA-435, dated 4/7/2024	C	This audit (SSTOM IA6 SSI-10051, dated 14/8/2024) is being conducted in accordance with the Independent Audit Post Approval Requirements (2020).
A37	Notwithstanding <b>Condition A36</b> , the Proponent may prepare an audit program to outline the scope and timing of each independent audit that will be undertaken during construction. If prepared, the audit program must be developed in consultation with, and approved by, the Planning Secretary prior to commencement of the first audit and implemented throughout construction.	<ul style="list-style-type: none"> <li>DPHI Independent Audit Post Approval Requirements, 2020</li> <li>This audit (SSTOM IA6 SSI-10051, dated 14/08/2024)</li> <li>Auditor Declaration of Independence Form, SSI-10051, J. Heltborg, dated 25/6/2024</li> </ul>	C	Noted.
A38	Proposed independent auditors must be approved by the Planning Secretary before the commencement of an Independent Audit.	Appointment of Experts - SSI-10051 audit 06: DPHI Letter to Sydney Metro RE: Sydney Metro Western Sydney Airport (SSI-10051) – approval of independent auditors, dated 4/7/2024	C	DPHI Letter approves the appointment of (Ms ██████████ as Lead Auditor and Mr ██████████ as Auditor) as the audit team to conduct the 6th construction phase Independent Audit (IA6) pursuant to SSI-10051 or SSTOM. It is noted that the 6th Construction Phase Independent Audit for WSA is the 2nd Construction Independent Audit for SSTOM. DPHI's Appointment of Experts Letter, dated 4/7/2024 requires the 6th Construction phase independent SSTOM environmental audit site inspection to be carried out within a fortnight of other Sydney Metro WSA site inspections for IA6, and no later than 31 August 2024. The site inspection for SSTOM IA6(2) was conducted on 14/8/2024, prior to 31/8/2024, and within 2 weeks of other WSA IA6 site inspections, which were conducted by WolfPeak on 2/8/2024.
A39	The Planning Secretary may require the initial and subsequent <b>Independent Audits</b> to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (DPIE, 2020), upon giving at least four (4) 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"> <li>This audit (SSTOM IA6 SSI-10051, dated 14/08/2024)</li> <li>Appointment of Experts - SSI-10051 audit 06</li> </ul>	C	This audit (SSTOM IA2 SSI-10051, dated 14/08/2024) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with Condition A39 for SSTOM IA2 will be verified during the 3rd SSTOM Independent Audit (IA3), and the 7th SMWSA Audit (IA7).
A40	<b>Independent Audit Reports</b> and the Proponent's response to audit findings must be submitted to the Planning Secretary within two (2) months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020) unless otherwise agreed by the Planning Secretary.	<ul style="list-style-type: none"> <li>This audit (SSTOM IA6 SSI-10051, dated 14/08/2024)</li> <li>SSI-10051, Independent Audit No.1 – Audit Report (SSTOM only), GHD, April 2024 (WSA IEA, Independent Audit No. 5 (IA5), 17/4/2024)</li> <li>SM - WSA Independent Audit No.5 – Combined Response to Findings, 24/4/2024</li> <li>20240424_Letter to DPHI - SSI 10051 Submission of Audit Report no. 5 (HC Signed), 24/4/2024</li> <li>Letter from DPHI to Sydney Metro RE: Sydney Metro SSI-10051 – extension to submission date for fifth independent audit report, dated 11/4/2024</li> <li>Evidence of submission of SM-WSA Submission of Independent Audit Report to DPHI, 24/4/2024 (SSI-10051-PA-401)</li> </ul>	C	This audit (SSTOM IA2 SSI-10051, dated 14/08/2024) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with Condition A40 for IA3 will be verified during the 3rd SSTOM Independent Audit (IA3), and the 7th SMWSA Audit (IA7). The IA1 SSTOM Audit Report, including the Proponent's response to audit findings, was not submitted to the Planning Secretary within 2 months of the IA1 site inspection. The SSTOM IA1 site inspection was undertaken on 13/2/2024, with the audit report due for submission to the Planning Secretary by 13/4/2024. The WSA IA1 IEA Report was submitted to the Planning Secretary on 24/4/2024, 11 days late. A letter from DPHI was sighted granting an extension of the due date for submission of the 5th construction phase IEA Report (SSTOM IA1) to 26 April 2024.
<b>INCIDENT AND NON-COMPLIANCE NOTIFICATION AND REPORTING</b>				
<b>Incident Notification, Reporting and Response</b>				
A41	The Planning Secretary must be notified via phone or in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. Any notification via phone must be followed up by a notification in writing via the Major Projects website within 24 hours of the initial phone call. The written notification must identify the CSSI (including the application number and the name of the CSSI if it has one) and set out the location and general nature of the incident.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>INC 001 - OHE Oil Spill, 12/12/2023</li> <li>INC 002 - OHE Oil Spill Feb, 12/2/2024</li> <li>INC 003 - LDN Hydraulic Oil Spill, 6/5/2024</li> <li>INC 004 - OHE Hydraulic Oil Spill, 8/7/2024</li> </ul>	NT	No incidents triggering notification to DPHI occurred during the audit period. Class 3 incidents were provided for review and agreed not to trigger DPHI notification.
A42	Any incident within or potentially affecting the Controlled Areas of the WaterNSW Pipelines corridor must also be reported to WaterNSW on the WaterNSW 24-hour Incident Notification Number 1800 061 069.	Interview with Sydney Metro & ParkLife Metro, 15/08/2024	NT	No incidents triggering notification to DPHI occurred during the audit period.
A43	Subsequent notification must be given and reports submitted in accordance with the requirements set out in <b>Appendix A</b> .	Interview with Sydney Metro & ParkLife Metro, 15/08/2024	NT	No incidents triggering notification to DPHI occurred during the audit period.

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Non-Compliance Notification</b>				
A44	The Planning Secretary must be notified in writing via the Major Projects website within seven (7) days after the Proponent becomes aware of any non-compliance with the terms of this approval.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 003, dated 27/2/2024</li> <li>NCR 003 - OHE ESC Installation DPHI submission (SSI-10051-PA-373), dated 1/3/2024</li> <li>DPHI Response RE: Sydney Metro - Western Sydney Airport - SSTOM Non-Compliance Notification Condition E128 - Service Level Agreement, dated 14/3/2024</li> <li>Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 004, dated 3/7/2024</li> <li>NCR 004 - OHE Generator Noise DPHI submission (SSI-10051-PA-464), dated 12/8/2024</li> </ul>	C	<p>There were two notifications of Non-Compliance (NC) submitted to DPHI for SSTOM during the audit period. The first NC was raised against Condition E128 and related to ERSED controls at the SSTOM Orchard Hills site. Notification of the NC to DPHI was within the required 7-day timeframe, and a response from DPHI was received. Refer Condition E128 for details.</p> <p>The second NC was raised against Condition E41(b)(i) and related to operational noise from a generator at the SSTOM Orchard Hills site. Notification of the NC to DPHI was within the required 7-day timeframe, and a response from DPHI was received. Refer Condition E41(b)(i) for details.</p> <p>There were no non-compliance raised during the 1st WSA SSTOM IEA.</p>
A45	A non-compliance notification must identify the CSSI (including 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.  <i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</i>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 003, dated 27/2/2024</li> <li>NCR 003 - OHE ESC Installation DPHI submission (SSI-10051-PA-373), dated 1/3/2024</li> <li>DPHI Response RE: Sydney Metro - Western Sydney Airport - SSTOM Non-Compliance Notification Condition E128 - Service Level Agreement, dated 14/3/2024</li> <li>Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 004, dated 3/7/2024</li> <li>NCR 004 - OHE Generator Noise DPHI submission (SSI-10051-PA-464), dated 12/8/2024</li> </ul>	C	<p>There were two notifications of Non-Compliance (NC) submitted to DPHI for SSTOM during the audit period. The first NC was raised against Condition E128 and related to ERSED controls at the SSTOM Orchard Hills site. Notification of the NC to DPHI was within the required 7-day timeframe, and a response from DPHI was received. <b>Refer Condition E128 for details.</b></p> <p>The second NC was raised against Condition E41(b)(i) and related to operational noise from a generator at the SSTOM Orchard Hills site. Notification of the NC to DPHI was within the required 7-day timeframe, and a response from DPHI was received. <b>Refer Condition E41(b)(i) for details.</b></p> <p>Details in NCR 003 and NCR 004 reports submitted to DPHI complied with the requirements of Condition A45.</p>
<b>IDENTIFICATION OF WORKFORCE</b>				
A46	All Heavy Vehicles used for spoil haulage must be clearly marked on the sides and rear with the project name and application number to enable immediate identification by a person viewing the Heavy Vehicle standing 20 metres away.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection, 14/08/2024</li> </ul>	NT	Unable to be verified at the time of audit due to no spoil haulage observed.
A47	The CSSI name, application number, telephone number, postal address and email address required under <b>Condition B3</b> must be available on site boundary fencing / hoarding at each ancillary facility before the commencement of construction. This information must also be provided on the website required under <b>Condition B11</b> .	<ul style="list-style-type: none"> <li>Site inspection, 14/08/2024</li> <li>Project website: <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a></li> </ul>	C	<p><b>Observation 4:</b> Signage posted at the main access to the Orchard Hills site did not comply with Condition A47, and was limited to Parklife Metro D&amp;C Construction signage.</p> <p><b>Recommendation:</b> Review signage displayed at PLM sites and ensure it complies with the requirements of Condition A47, i.e. includes the CSSI name, application number, telephone number, postal address and email address.</p> <p><b>NB:</b> Evidence of compliant signage displayed at OHE was provided post-audit on 18/9/2024.</p>
<b>PART B</b>				
<b>COMMUNITY INFORMATION AND REPORTING</b>				
<b>COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT</b>				
<b>Community Communication</b>				
B1	The <b>Overarching Community Communication Strategy</b> as provided in the documents listed in <b>Condition A1</b> , or updated Strategy must be implemented for the duration of the work.  Should the <b>Overarching Community Communication Strategy</b> be updated, a copy must be provided to the Planning Secretary for information.	<ul style="list-style-type: none"> <li>SM Overarching Community Communication Strategy OCCS Rev4, dated 14 December 2023</li> <li>Post Approval submission form to DPHI, OCCS, dated 7/2/2024</li> <li>DPHE Letter to Sydney Metro RE: Receipt of SM-WSA OCCS Rev 4, dated 14/12/2023, dated 13/2/2024</li> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>SSTOM Complaints Register February-August 2024</li> </ul>	C	<p>The Community Communication Strategy (CCS) is a Sydney Metro document that sets out the mechanisms for which communication between the community and key stakeholders will be carried out.</p> <p>The CCS addresses who (the Proponent, Independent Appointments and/or construction contractor) will engage with the community, relevant councils and agencies, how they will engage and the timing of engagements.</p> <p>Submission to and receipt from DPHI sighted for updated OCCS.</p>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>COMPLAINTS MANAGEMENT SYSTEM</b>				
B2	A <b>Complaints Management System</b> 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 CSSI.	<ul style="list-style-type: none"> <li>SM-WSA SSTOM Complaints Report - Feb-July 2024</li> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>SM-WSA Cumulative Impacts Monthly Meeting Minutes #007, dated 21/8/2024</li> </ul>	C	<p>Complaints are recorded in Consultation Manager (CM), a TINSW database. PLM has a contract obligation to provide 3x Place Manager roles for SSTOM. The contractor reports Daily Complaints to the EPA in accordance with EPL requirements. A Weekly Complaints Report is distributed to DPHI and the ER. The ER Project Monthly Report summarises complaints attributed to the project for the month.</p> <p>Complaints within the reporting period have been focussed on predominantly isolated incidents including the runoff of dirty water (Orchard Hills); Noise during standard construction hours; Road damage (Orchard Hills); and worker parking (St Marys).</p> <p>As requested by DPHI during consultation for IA2, a review of the management of potential cumulative impacts from nearby projects, including other Sydney Metro WSA Packages was conducted.</p> <p>Potential exists for cumulative impacts from SSTOM and other nearby construction sites, particularly at Orchard Hills and Bradfield stations. Cumulative impacts from interfaces and other nearby construction sites have been managed through monthly Cumulative Impact Meetings. Recent meeting minutes were provided as evidence and included attendees from Sydney Metro, SCAW, SBT, SSTOM and FSM Environment and Project management teams. Issues discussed in meetings included a lookahead for out of hours work at each location, and potential for cumulative impacts related to environmental aspects including Surface water management, Air quality and Heavy Vehicle (HV) movements during peak hours.</p> <p>It was noted that truck movements for SCAW and SBT were decreasing due to completion of imports and tunnelling works, while truck movements associated with SSTOM were predicted to be increasing as works ramp up. Potential for cumulative impacts with M12 works was also discussed. Auditees described the process of Contractors discussing their scope of works at each station daily to determine the potential for cumulative impacts and mitigation. Informal discussions about the minimisation of cumulative impacts also occurs between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site, though it is noted this is an ongoing focus for the project.</p>
B3	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: (a) a 24-hour telephone number for the registration of complaints and enquiries about the CSSI; (b) a postal address to which written complaints and enquiries may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a mediation system for complaints unable to be resolved.  This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>SM-WSA SSTOM Complaints Report - Feb-July 2024</li> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> </ul>	C	<p>(a) A project 1800 number (1800 717 703) has been established (b) Project postal address: Sydney Metro, PO Box K659, Haymarket NSW 1240 (c) A project email address (whitbl@transport.nsw.gov.au) has been established and can be accessed via the Contact Us link on the ParkLife Metro website (d) A mediation system has been established (refer B8-B10)</p> <p>The above information is available on the project website, on shadecloth around construction sites, and is included in community notifications.</p>
B4	A <b>Complaints Register</b> must be maintained recording information on all complaints received about the CSSI 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: (a) number of complaints received; (b) date and time of the complaint; (c) number of people (in the household) affected in relation to a complaint, if relevant; (d) method by which the complaint was made; (e) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (f) issue of the complaint; (g) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and (h) if no action was taken, the reason(s) why no action was taken.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>SM-WSA SSTOM Complaints Report - Feb-July 2024</li> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>SSTOM Complaints Register February-August 2024</li> </ul>	C	<p>The SSTOM Complaints Register for the audit period was sighted. The Complaints Register is updated as complaints are received. The Contractor provides a copy of the Complaints Register to TINSW daily. Sydney Metro provides a copy of the Complaints Register to DPHI weekly. A copy is also provided to the ER weekly.</p> <p>Complaints within the reporting period have been focussed on predominantly isolated incidents including the runoff of dirty water (Orchard Hills); Noise during standard construction hours; Road damage (Orchard Hills); and Worker parking (St Marys).</p>
B5	Complainants must be advised of the following information before, or as soon as practicable after, providing personal information: (a) the Complaints Register may be forwarded to government agencies, including the Department (Department of Planning Industry and Environment, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150), to allow them to undertake their regulatory duties; (b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies; (c) the supply of personal information by the complainant is voluntary; and (d) the complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement).  The <b>Collection Statement</b> must be included on the Proponent or development website to make prospective complainants aware of their rights under the <i>Privacy and Personal Information Protection Act 1998</i> (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.	<ul style="list-style-type: none"> <li>SM-WSA SSTOM Complaints Report - Feb-July 2024</li> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>Complainants Privacy Collection Statement: <a href="https://parklifemetro.com.au/wp-content/uploads/2023/08/Complaints-Privacy-Collection-Notice">https://parklifemetro.com.au/wp-content/uploads/2023/08/Complaints-Privacy-Collection-Notice</a></li> </ul>	C	<p>Auditees provided a summary of information describing how the information specified in Condition B5 is communicated to complainants.</p> <ul style="list-style-type: none"> <li>The Complainants Privacy Collection Statement was available on the PLM website - <a href="https://parklifemetro.com.au/wp-content/uploads/2023/08/Complaints-Privacy-Collection-Notice">https://parklifemetro.com.au/wp-content/uploads/2023/08/Complaints-Privacy-Collection-Notice</a> and Sydney Metro website - <a href="https://www.sydneymetro.info/privacy-statement-use-sydney-metro-website">https://www.sydneymetro.info/privacy-statement-use-sydney-metro-website</a></li> <li>A Privacy Management Plan has been prepared and was available on the Sydney Metro website - <a href="https://www.sydneymetro.info/media/document/42641">https://www.sydneymetro.info/media/document/42641</a></li> <li>ParkLife Metro has prepared a SSTOM Community Communications Strategy - Delivery - <a href="https://parklifemetro.com.au/wp-content/uploads/2023/11/SMW_SASSM-PLD-1NL-PC-PLN-000065-Community-Communications-Strategy-Rev-0.pdf">https://parklifemetro.com.au/wp-content/uploads/2023/11/SMW_SASSM-PLD-1NL-PC-PLN-000065-Community-Communications-Strategy-Rev-0.pdf</a></li> </ul> <p>The above documents were reviewed and meet the requirements of Condition B5.</p>
B6	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.  <b>Note:</b> Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>SM-WSA SSTOM Complaints Report - Feb-July 2024</li> </ul>	C	Sydney Metro provides a copy of the Complaints Register to DPHI weekly.

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B7	A <b>Community Complaints Mediator</b> that is independent of the design and construction personnel must be engaged by the Proponent, upon the referral of the complaint by the ER in accordance with the <b>Overarching Community Communication Strategy</b> .	<ul style="list-style-type: none"> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>OCCS Rev 4 14 Dec 2023</li> <li>Sydney Metro WSA Construction Complaints Management System</li> </ul>	NT	In accordance with the Sydney Metro WSA Construction Complaints Management System, issues and complaint escalation to independent mediation would be at the recommendation of the ER following a thorough review of the complaint information in consideration of the project planning and assessment process. The Director, Project Communication may also refer a complaint to independent mediation at any point in the complaint.  There have been no complaints referred to mediation during the course of the SSTOM project.
B8	The role of the <b>Community Complaints Mediator</b> is to provide independent mediation services for any reasonable and unresolved complaint referred by the ER where a member of the public is not satisfied by the Proponent's response. Where a <b>Community Complaints Mediator</b> is required, a mediator accredited under the National Mediator Accreditation System (NMAS), administered by the Mediator Standards Board must be appointed.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>OCCS Rev 4 14 Dec 2023</li> <li>Sydney Metro WSA Construction Complaints Management System</li> </ul>	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for SSTOM during the audit period.
B9	The <b>Community Complaints Mediator</b> will: (a) review any unresolved disputes, referred by the ER in accordance with the <b>Overarching Community Communication Strategy</b> ; (b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes; and (c) provide a copy of the recommendations, and the Proponent's response to the recommendations, to the Planning Secretary within one month of the recommendations being made.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SM-WSA SSTOM Complaints Report - Feb-July 2024</li> </ul>	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for SSTOM during the audit period.
B10	<b>Community Complaints Mediation</b> will not be enacted before the <b>Complaints Management System</b> required by <b>Condition B2</b> has been executed for a complaint and will not consider issues such as property acquisition, where other dispute processes are provided for in this approval, statute or clear government policy and resolution processes are available, or matters which are not within the scope of this CSSI.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SM-WSA SSTOM Complaints Report - Feb-July 2024</li> </ul>	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for SSTOM during the audit period.

**PROVISION OF ELECTRONIC INFORMATION**

B11	<p>A website or webpage providing information in relation to the CSSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 24 months following the completion of all stages of construction of the CSSI. Up-to-date information (excluding confidential, private, 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>(a) information on the current implementation status of the CSSI; (b) a copy of the documents listed in Condition A1, and any documentation relating to any modifications made to the CSSI or the terms of this approval; (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; (d) a copy of each statutory approval, licence or permit required and obtained in relation to the CSSI, or where the issuing agency maintains a website of approvals, licences or permits, a link to that website; (e) a current copy of each document required under the terms of this approval, which must be published within one (1) 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 (f) a copy of the audit reports required under this approval.</p> <p>Where the information / document relates to a particular work or is required to be implemented, it must be published before the commencement of the relevant work to which it relates or before its implementation.</p> <p>All information required in this condition is to be provided on the website or webpage, and easy to navigate.</p>	<ul style="list-style-type: none"> <li>PLM Project website: <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a></li> <li>Sydney Metro Document Library: <a href="https://www.sydneymetro.info/documents">https://www.sydneymetro.info/documents</a></li> <li>Construction Environment Management Plan (CEMP), SSTOM, Rev 01 19/7/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>CTMP Orchard Hills Station, Rev01, dated 8/4/2024</li> <li>CTMP Orchard Hills Station, Rev02, dated 11/6/2024</li> <li>CTMP Orchard Hills Station, DPHI Submission, dated 6/8/2024</li> </ul>	C	<p>A project website had been established for SSTOM: <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a> Sydney Metro also maintains a project website: <a href="https://www.sydneymetro.info/documents">https://www.sydneymetro.info/documents</a></p> <p>(a) Work Updates including current and past work activity notifications were available on the Sydney Metro project website and addressed the current scope of work at the time of the audit, including out of hours works. The website includes documentation required under <b>Condition A1</b> including CEMPs, communication strategies and reports, sustainability documents etc. (b) &amp; (c) Documents listed in <b>Condition A1</b> were available on the website: <a href="https://www.sydneymetro.info/documents">https://www.sydneymetro.info/documents</a>, and included the EIS Chapters &amp; Appendices, Submissions Report and overarching documents associated with the project approval, e.g. Ministers Conditions of Approval, Unexpected Contamination Finds Protocol, and WSA Staging Report Rev 10, May 2024. (d) Project approval &amp; the contractor EPL was on the website. (e) A current copy of most documents requested as evidence during the audit was available on the project website. <b>Refer below for Observation and Recommendation.</b> (f) The previous SSTOM Independent Audit Report (SSTOM IA1/ WSA IA5) was on the project website.</p> <p>The website was generally easy to navigate and documents searched for by the Auditor were located in a timely manner.</p> <p><b>Observation 5:</b> The latest version of the CTMP Orchard Hills Station is Rev02, dated 11/6/2024, as submitted to DPHI on 6/8/2024. The version of the CTMP on the project website was CTMP Orchard Hills Station, Rev0, dated 27/9/2023. <b>Recommendation:</b> A review of the Sydney Metro and PLM website should be undertaken to ensure all documents are current.</p>
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Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>PART C</b>				
<b>CONSTRUCTION ENVIRONMENTAL MANAGEMENT</b>				
<b>CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN</b>				
C1	Construction Environmental Management Plans (CEMPs) and CEMP Sub-plans 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"> <li>Sydney Metro WSA Staging Report Rev 10, 22 May 2024</li> <li>Construction Environment Management Plan (CEMP), SSTOM, Rev 01 19/7/2024</li> <li>DPHI CEMP &amp; Sub-plan approval letter:               <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> <li>SM-WSA Environmental Impact Statement, Appendix F - Construction Environmental Management Framework (CEMF), September 2020</li> </ul> </li> <li>Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206, dated 5/12/2023</li> <li>Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 01, 17/7/2023</li> </ul>	NC	<p>Appendix C of the Staging Report documents applicable CEMP requirements for each stage, which have been addressed in the CEMP, endorsed by the ER and approved by DPHI. The CEMP includes reference to the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020).</p> <p><b>Non-Compliance</b> Section 3.4 (f) of the CEMP addresses the preparation of CEMPs and requires "The Principal Contractor CEMP will cover the requirements of the relevant planning approval documentation, the conditions of all other permits and licences, the Principal Contractor's corporate EMS, the environmental provisions of the contract documentation and this Construction Environmental Management Framework". Section 12.2 (a)(viii) of the CEMP addresses Soil and Water and requires "Principal Contractors will develop and implement a Soil and Water Management Plan for all off-airport works ... will include as a minimum: The requirements of any applicable licence conditions".</p> <p>The Sydney Water Trade Waste Agreement (TWA) in place for discharge of wastewater to sewer from the St Mary's Water Treatment Plant (WTP) has not been identified in the SSTOM CEMP. The TWA and applicable conditions have also not been identified in the SSTOM Soil and Water Management Sub-Plan (SWMP). It is noted that the option to discharge to trade waste is presented (amongst other options) in the Groundwater Monitoring Program (SWMP, Appendix G), but no details are provided, as the TWA was issued after the GWMP was prepared.</p> <p><b>Recommendation</b> Review and update the SSTOM CEMP and SWMP to address requirements for the discharge of wastewater to sewer under the Sydney Water Trade Waste Agreement, as required by the SM-WSA CEMP Sections 3.4(f) and 12.2(a)(viii). An update to the Water Quality Monitoring Program (WQMP) may also be required to satisfy the TWA conditions.</p>
C2	With the exception of any CEMPs expressly nominated by the Planning Secretary to be endorsed by the ER, all CEMPs must be submitted to the Planning Secretary for approval.  <i>Note: The Planning Secretary will consider the assessment of the predicted level of environmental risk and potential level of community concern required under Condition A11(e) when deciding whether any CEMP's may be endorsed by the ER.</i>	<ul style="list-style-type: none"> <li>Sydney Metro WSA Staging Report Rev 10, 22 May 2024</li> <li>Construction Environment Management Plan (CEMP), SSTOM, Rev 01 19/7/2024</li> <li>DPHI CEMP &amp; Sub-plan approval letter:               <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> <li>ER endorsement of GWMP Rev0.0, letter dated 11/7/2023</li> <li>ER endorsement of AQMP Rev0.0, letter dated 27/6/2023</li> <li>ER endorsement of SWMP Rev0.0, letter dated 26/6/2023</li> <li>ER Endorsement of Surface Water Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023</li> </ul>	C	<p>The WSA SSTOM CEMP &amp; Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for SSTOM commenced on 8/8/2023, after DPHI approval.</p>
C3	The CEMP(s) not requiring the Planning Secretary's approval must be submitted to the ER for endorsement no later than one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage. That CEMP must obtain the endorsement of the ER as being consistent with the conditions of this approval and all undertakings made in the documents listed in Condition A1.	<ul style="list-style-type: none"> <li>Construction Environment Management Plan (CEMP), SSTOM, Rev 01 19/7/2024</li> <li>Construction Environment Management Plan (CEMP), SSTOM, Rev 01 19/7/2024</li> <li>DPHI CEMP &amp; Sub-plan approval letter:               <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> <li>ER Endorsement of CEMP Rev0.0, letter dated 27/6/2023</li> <li>ER endorsement of AQMP Rev0.0, letter dated 27/6/2023</li> <li>ER Endorsement of AQCMP Rev 0.0, dated 28/6/2023</li> <li>ER Endorsement of FFMP Rev 2.0, letter dated 27/3/2024</li> <li>ER endorsement of GWMP Rev0.0, letter dated 11/7/2023</li> <li>ER Endorsement of NAWMP Rev 0.0, letter dated 26/6/2023</li> <li>ER Endorsement of NVMP Rev 0.0, letter dated 27/6/2023</li> <li>ER Endorsement of NVCMP Rev 0.0, letter dated 28/6/2023</li> <li>ER endorsement of SWMP Rev0.0, letter dated 26/6/2023</li> <li>ER Endorsement of SWQCM Rev 0.0, letter dated 28/6/2023</li> <li>ER Endorsement of VAMP Rev 0.0, letter dated 31/7/2023</li> <li>ER Endorsement of WMP Rev 1.0, letter dated 31/7/2023</li> <li>ER Endorsement of Aboriginal Cultural Heritage Management Plan Rev 9.0</li> <li>Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023</li> <li>Letter to DPE - SSI 10051 Submission of Endorsed SSTOM CEMP, dated 28/6/2023</li> <li>Post Approval Form_20230628225726, Submission of endorsed SSTOM CEMP, 28/6/2024</li> </ul>	C	<p>The WSA SSTOM CEMP &amp; Sub-plans were:</p> <ul style="list-style-type: none"> <li>Endorsed by the ER on 28/6/2023 (SWMP, NAWMP, &amp; NVMP), 11/7/2023 (GWMP), 31/7/2023 (VAMP, WMP), 27/3/2024 (FFMP)</li> <li>Submitted to DPHI on 28/6/2023</li> <li>Approved by DPHI in a letter dated 4/8/2023</li> <li>Construction for SSTOM commenced on 8/8/2023, after DPHI approval.</li> </ul> <p>SSTOM CEMP &amp; Sub-plans were submitted to DPHI for approval no later than one month before the commencement of SSTOM in accordance with Condition C3.</p> <p>The SSTOM CEMP &amp; Sub-plans include requirements relevant to MOD-1 (approved 14/4/2022) to amend Condition E4 to reduce the biodiversity offset credit requirement.</p> <p>DPHI approved the WSA SSTOM CEMP, Sub-plans and Monitoring Programs in a letter dated 4/8/2023.</p> <p>Notifications of commencement of construction were submitted to DPHI (as per Conditions A34 &amp; A35) for each stage. Commencement of Construction for SSTOM was on 1/8/2023 for commencement date 8/8/2023. The original CEMP and Sub-plans (Rev 0.0) were endorsed by the ER on 27/6/2023, more than one month prior to the commencement of construction date for SSTOM.</p>
C4	Any CEMP to be approved by the Planning Secretary must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	<ul style="list-style-type: none"> <li>Construction Environment Management Plan (CEMP), SSTOM, Rev 01 19/7/2024</li> <li>DPHI CEMP &amp; Sub-plan approval letter:               <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> <li>ER Endorsement of CEMP Rev0.0, letter dated 27/6/2023</li> <li>Letter to DPE - SSI 10051 Submission of Endorsed SSTOM CEMP, dated 28/6/2023</li> <li>Post Approval Form_20230628225726, Submission of endorsed SSTOM CEMP, 28/6/2024</li> </ul>	C	<p>The WSA SSTOM CEMP Rev 0.0 was:</p> <ul style="list-style-type: none"> <li>Endorsed by the ER on 27/6/2023</li> <li>Submitted to DPHI on 28/6/2023</li> <li>Approved by DPHI in a letter dated 4/8/2023</li> <li>Construction for SSTOM commenced on 8/8/2023</li> </ul> <p>The SSTOM CEMP was submitted to DPHI for approval no later than one month before the commencement of SSTOM in accordance with Condition C3 and C4.</p>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED], Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations															
C5	<p>Of the CEMP Sub-plans required under Condition C1, the following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan. Details of issues raised by a government agency during consultation (as required by Condition A6) must be provided with the relevant CEMP Sub-plan when submitted to the Planning Secretary / ER (whichever is applicable). Where a government agency(ies) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why.</p> <table border="1"> <thead> <tr> <th></th> <th>Required CEMP Sub-plan</th> <th>Relevant government agencies to be consulted for each CEMP Sub-plan</th> </tr> </thead> <tbody> <tr> <td>(a)</td> <td>Noise and vibration</td> <td>Relevant Councils and WaterNSW (in relation to its assets)</td> </tr> <tr> <td>(b)</td> <td>Flora and fauna</td> <td>DPIE EES, DPI Fisheries, and Relevant Councils</td> </tr> <tr> <td>(c)</td> <td>Soil and Water</td> <td>DPI Fisheries, and Relevant Councils</td> </tr> <tr> <td>(d)</td> <td>Non-Aboriginal heritage</td> <td>Relevant Councils, WaterNSW and Heritage NSW</td> </tr> </tbody> </table> <p>temporal activities or activity based staging.</p>		Required CEMP Sub-plan	Relevant government agencies to be consulted for each CEMP Sub-plan	(a)	Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)	(b)	Flora and fauna	DPIE EES, DPI Fisheries, and Relevant Councils	(c)	Soil and Water	DPI Fisheries, and Relevant Councils	(d)	Non-Aboriginal heritage	Relevant Councils, WaterNSW and Heritage NSW	<ul style="list-style-type: none"> <li>• Sydney Metro WSA Staging Report Rev 10, 22 May 2024</li> <li>• Construction Environment Management Plan (CEMP), SSTOM, Rev 01 19/7/2024</li> <li>• Noise and Vibration Management Sub-plan (NVMP), SSTOM, Rev 02, 1/8/2023</li> <li>• Flora and Fauna Management Sub-plan (FFMP), Rev 02, 13/3/2024</li> <li>• Air Quality Management Sub Plan (AQMP), SSTOM, Rev 01, 20/7/2023</li> <li>• Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 01, 17/7/2023</li> <li>• Non-Aboriginal Heritage Management Sub Plan (HMP), SSTOM, Rev 01, 17/7/2023</li> <li>• Waste Management Sub Plan (WMP), SSTOM, Rev 01, 28/7/2023</li> <li>• Visual Amenity Management Sub Plan (VAMP), Rev 00, 27/6/2023</li> </ul> <ul style="list-style-type: none"> <li>• DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>• WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> </ul> <p>Consultation Report is attached to each Sub-Plan.</p>	C	<p>Partially Applicable as per the table in Appendix B of the Staging Report Rev 10, 22 May 2024 Table 4-2 of the Staging Report lists the following Sub-plans as applicable to SSTOM:</p> <p>a) Noise and Vibration Management Sub-plan and monitoring program  b) Flora and Fauna Sub-plan  c) Soil and Water Sub-plan and monitoring program  d) Non-Aboriginal Heritage Sub-plan</p> <p>The details of agency consultation are included in each relevant Sub-plan. Consultation with agencies, and the approval of the original WSA SSTOM CEMP &amp; Sub-plans was not conducted within the IA2 reporting period. DPHI approved the WSA SSTOM CEMP &amp; Sub-plans, which included the verification of agency consultation as per C5, in a letter dated 4 August 2023.</p>
	Required CEMP Sub-plan	Relevant government agencies to be consulted for each CEMP Sub-plan																	
(a)	Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)																	
(b)	Flora and fauna	DPIE EES, DPI Fisheries, and Relevant Councils																	
(c)	Soil and Water	DPI Fisheries, and Relevant Councils																	
(d)	Non-Aboriginal heritage	Relevant Councils, WaterNSW and Heritage NSW																	
C6	<p>The CEMP Sub-plans must state how:</p> <p>(a) the environmental performance outcomes identified in the documents listed in Condition A1 will be achieved;</p> <p>(b) the mitigation measures identified in the documents listed in Condition A1 will be implemented;</p> <p>(c) the relevant terms of this approval will be complied with; and</p> <p>(d) issues requiring management during construction (including cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART principles.</p>	<ul style="list-style-type: none"> <li>• SSTOM CEMP, Rev 01, 19/7/2024</li> <li>• SSTOM NVMP, Rev 02, 1/8/2023</li> <li>• SSTOM FFMP, Rev 02, 13/3/2024</li> <li>• SSTOM AQMP, Rev 01, 20/7/2023</li> <li>• SSTOM SWMP, Rev 01, 17/7/2023</li> <li>• SSTOM HMP, Rev 01, 17/7/2023</li> <li>• SSTOM WMP, Rev 01, 28/7/2023</li> <li>• SSTOM VAMP, Rev 00, 27/6/2023</li> </ul> <ul style="list-style-type: none"> <li>• DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>• WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> </ul>	C	The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023.															
C7	With the exception of any CEMP Sub-plans expressly nominated by the Planning Secretary to be endorsed by the ER, all CEMP Sub-plans must be submitted to the Planning Secretary for approval.	<ul style="list-style-type: none"> <li>• SSTOM FFMP, Rev 02, 13/3/2024</li> <li>• Sydney Metro WSA SSI 10051 MOD 1 Approval, dated 14/4/2024</li> <li>• DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>• WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> </ul>	C	DPHI approval of the WSA SSTOM CEMP & Sub-plans was not within the IA6 audit period. Compliance with Condition C7 was verified during a previous audit. The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023.															
C8	The CEMP Sub-plans not requiring the Planning Secretary's approval must obtain the endorsement of the ER as being in accordance with the conditions of approval and all relevant undertakings made in the documents listed in Condition A1. Any of these CEMP Sub-plans must be submitted to the ER with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	<ul style="list-style-type: none"> <li>• ER endorsement of GWMP Rev0.0, letter dated 11/7/2023</li> <li>• ER endorsement of AQMP Rev0.0, letter dated 27/6/2023</li> </ul>	C	The documents required by CEMP and not requiring DPHI approval - Groundwater Monitoring Program and AQMP have been endorsed by the ER.															
C9	Any of the CEMP Sub-plans to be approved by the Planning Secretary must be submitted to the Planning Secretary with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	<ul style="list-style-type: none"> <li>• DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>• WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> </ul>	C	As per the DPHI approval letter, the CEMP, Sub-plans and associated monitoring programs were submitted in compliance with Condition C9.															
C10	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction.	<ul style="list-style-type: none"> <li>• SSTOM CEMP, Rev 01, 19/7/2024</li> <li>• SSTOM NVMP, Rev 02, 1/8/2023</li> <li>• SSTOM FFMP, Rev 02, 13/3/2024</li> <li>• SSTOM AQMP, Rev 01, 20/7/2023</li> <li>• SSTOM SWMP, Rev 01, 17/7/2023</li> <li>• SSTOM HMP, Rev 01, 17/7/2023</li> <li>• SSTOM WMP, Rev 01, 28/7/2023</li> <li>• SSTOM VAMP, Rev 00, 27/6/2023</li> </ul> <ul style="list-style-type: none"> <li>• DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>• WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> <li>• ER endorsement of GWMP Rev0.0, letter dated 11/7/2023</li> <li>• ER endorsement of AQMP Rev0.0, letter dated 27/6/2023</li> </ul>	C	DPHI approval of the original WSA SSTOM CEMP & Sub-plans was not within the IA6 audit period. Compliance with Condition C10 was verified during a previous audit. The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023. The implementation of the CEMP & Sub-plans was verified during the audit site inspection and as noted throughout the audit.															
C11	In addition to the relevant requirements of the CEMP, the Flora and Fauna CEMP Sub-plan must include but not be limited to:	<ul style="list-style-type: none"> <li>• ER Endorsement of FFMP Rev 2.0, letter dated 27/3/2024</li> <li>• DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>• WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> <li>• Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	C	The WSA SSTOM Flora and Fauna CEMP Sub-plan was endorsed by the ER on 27/3/2024. A detailed review of compliance of the WSA SSTOM Flora and Fauna CEMP Sub-plan with Condition C11 was conducted during IA1 and found to meet the relevant requirements.															

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations										
C12	In addition to the relevant requirements of the CEMF, the <b>Soil and Water CEMP Sub-Plan</b> must include but not be limited to:  (a) details how the requirements of <b>Conditions E127, E128 and E129</b> will be met; and (b) the unexpected contaminated finds protocol required by <b>Condition E98</b> .	<ul style="list-style-type: none"> <li>ER endorsement of SWMP Rev0.0, letter dated 26/6/2023</li> <li>ER Endorsement of SWQCMP Rev 0.0, letter dated 28/6/2023</li> <li>DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 01, 17/7/2023</li> <li>Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev01, 17/7/2023 (SWMP, Appendix B)</li> <li>Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206, dated 5/12/2023</li> </ul>	C	<p>The WSA SSTOM Soil and Water CEMP Sub-plan was endorsed by the ER on 26/6/2023.</p> <p>The WSA SSTOM Soil and Water CEMP Sub-plan was approved by DPHI on 4/8/2023.</p> <p>WSA SSTOM construction commenced on 8/8/2023, after Soil and Water CEMP Sub-plan endorsement and DPHI approval.</p> <p>Minor amendments to the CEMP and Sub-plans have been approved by the ER as required.</p> <p>A detailed review of compliance of the WSA SSTOM Soil and Water CEMP Sub-plan with Condition C12 was conducted during IA1 and found to meet the relevant requirements, including how Conditions E127, E128 and E129 will be met. Refer to Conditions E127, E128 and E129 for more information.</p> <p><b>Refer to Condition C1 for recommendations to update the CEMP and SWMP to identify the TWA and address TWA conditions.</b></p>										
<b>CONSTRUCTION MONITORING PROGRAMS</b>														
C13	<p>The following <b>Construction Monitoring Programs</b> must be prepared in consultation with the relevant government agencies (as required by <b>Condition A6</b>) identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in <b>Condition A1</b> or in the <b>CEMP</b>. Where a government agency(ies) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why.</p> <table border="1" data-bbox="168 597 697 711"> <thead> <tr> <th>Required Construction Monitoring Programs</th> <th>Relevant government agencies to be consulted for each Construction Monitoring Program</th> </tr> </thead> <tbody> <tr> <td>(a) Noise and vibration</td> <td>Relevant Councils and WaterNSW (in relation to its assets)</td> </tr> <tr> <td>(b) Surface water quality</td> <td>DPIE Water, DPI Fisheries, and Relevant Councils</td> </tr> <tr> <td>(c) Groundwater</td> <td>DPIE Water</td> </tr> <tr> <td>(d) Air Quality</td> <td>Relevant Councils</td> </tr> </tbody> </table>	Required Construction Monitoring Programs	Relevant government agencies to be consulted for each Construction Monitoring Program	(a) Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)	(b) Surface water quality	DPIE Water, DPI Fisheries, and Relevant Councils	(c) Groundwater	DPIE Water	(d) Air Quality	Relevant Councils	<ul style="list-style-type: none"> <li>SSTOM CEMP, Rev 01, 19/7/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023, includes: <ul style="list-style-type: none"> <li>Noise and Vibration Monitoring Program</li> </ul> </li> <li>SSTOM AQMP, Rev 01, 20/7/2023, includes: <ul style="list-style-type: none"> <li>Air Quality Construction Monitoring Program</li> </ul> </li> <li>SSTOM SWMP, Rev 01, 17/7/2023, includes: <ul style="list-style-type: none"> <li>Surface Water Monitoring Program</li> <li>Groundwater Monitoring Program, Rev A, dated 11/5/2023</li> </ul> </li> <li>ER Endorsement of Noise and Vibration Construction Monitoring Program Rev 0.0, letter dated 28/6/2023</li> <li>ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023</li> <li>ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023</li> <li>DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> </ul>	C	<p>Partially Applicable as per the table in Appendix B of the Staging Report Rev 10, 22 May 2024 Table 4-2 of the Staging Report lists the following Sub-plans as applicable to SSTOM:</p> <p>a) Noise and Vibration Monitoring Program - Included in Sub-plan b) Surface Water Quality Monitoring Program - Included in Sub-plan c) Groundwater Monitoring Program - Included in Sub-plan d) Air Quality Monitoring Program - Included in Sub-plan</p> <p>Compliance with Condition C13 was verified during IA1. Details of consultation with the relevant government agencies is documented in each relevant Sub-plan.</p> <p>The WSA SSTOM CEMP and Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI in a letter dated 4/8/2023.</p>
Required Construction Monitoring Programs	Relevant government agencies to be consulted for each Construction Monitoring Program													
(a) Noise and vibration	Relevant Councils and WaterNSW (in relation to its assets)													
(b) Surface water quality	DPIE Water, DPI Fisheries, and Relevant Councils													
(c) Groundwater	DPIE Water													
(d) Air Quality	Relevant Councils													
C14	Each <b>Construction Monitoring Program</b> must provide: (a) details of baseline data available including the period of baseline monitoring; (b) details of baseline data to be obtained and when; (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; (g) the reporting of monitoring results and analysis results against relevant criteria; (h) details of the methods that will be used to analyse the monitoring data; (i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicated unacceptable project impacts; (j) a consideration of SMART principles; (k) any consultation to be undertaken in relation to the monitoring programs; and (l) any specific requirements as required by <b>Conditions C15 to C16</b> .	<ul style="list-style-type: none"> <li>SSTOM CEMP, Rev 01, 19/7/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023, includes: <ul style="list-style-type: none"> <li>Noise and Vibration Monitoring Program</li> </ul> </li> <li>SSTOM AQMP, Rev 01, 20/7/2023, includes: <ul style="list-style-type: none"> <li>Air Quality Construction Monitoring Program</li> </ul> </li> <li>SSTOM SWMP, Rev 01, 17/7/2023, includes: <ul style="list-style-type: none"> <li>Surface Water Monitoring Program</li> <li>Groundwater Monitoring Program, Rev A, dated 11/5/2023</li> </ul> </li> <li>ER Endorsement of Noise and Vibration Construction Monitoring Program Rev 0.0, letter dated 28/6/2023</li> <li>ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023</li> <li>ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023</li> <li>DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> </ul>	C	<p>Construction monitoring programs for Noise &amp; Vibration, Air Quality and Soil &amp; Water were reviewed as part of the audit. All parts (a)-(l) of Condition C14 were included in each monitoring program.</p> <p>The WSA SSTOM Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI (in the case of the Noise &amp; Vibration and Surface Water monitoring programs) in a letter dated 4/8/2023.</p>										
C15	The <b>Noise and Vibration Construction Monitoring Program</b> must include: (a) noise and vibration monitoring at representative residential and other locations (including at the worst-affected residences), subject to property owner approval, to confirm construction noise and vibration levels; (b) monitoring undertaken during the day, evening and night-time periods throughout the construction period and cover the range of activities being undertaken; (c) method and frequency for reporting monitoring results; and (d) a process to undertake real time noise and vibration monitoring.  The results of the monitoring must be readily available to the construction team, the Proponent and ER. The Planning Secretary and EPA must be provided with access to the results on request.	<ul style="list-style-type: none"> <li>SSTOM CEMP, Rev 01, 19/7/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023, includes: <ul style="list-style-type: none"> <li>Noise and Vibration Monitoring Program</li> </ul> </li> <li>ER Endorsement of Noise and Vibration Construction Monitoring Program Rev 0.0, letter dated 28/6/2023</li> <li>DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> </ul>	C	<p>The Noise &amp; Vibration monitoring program (part of the WSA SSTOM Construction NVMP) was reviewed as part of the audit. All parts (a)-(d) of Condition C15 were included in the monitoring program.</p> <p>The WSA SSTOM Noise and Vibration construction monitoring program was endorsed by the ER in a letter dated 28/6/2023. The WSA SSTOM Noise and Vibration construction monitoring program was approved by DPHI in a letter dated 4/8/2023.</p>										

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED], Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C16	Groundwater Construction Monitoring Program must include: (a) groundwater monitoring networks at each construction excavation site predicted to intercept groundwater in the documents listed in Condition A1; (b) detail of the location of all monitoring bores with nested sites to monitor both shallow and deep groundwater levels and quality; (c) define the location of saltwater interception monitoring where sentinel groundwater monitoring bores will be installed between the saline sources and that of each construction excavation site predicted to intercept groundwater in the documents listed in Condition A1; (d) results from existing monitoring bores; (e) monitoring and gauging of groundwater inflow to the excavations predicted to intercept groundwater in the documents listed in Condition A1, appropriate trigger action response plan for all predicted groundwater impacts upon each noted neighbouring groundwater system component for each excavation construction site; (f) trigger levels for groundwater quality, salinity and groundwater drawdown in monitoring bores and / or other groundwater users; (g) daily measurement of the amount of water discharged from the water treatment plants; (h) water quality testing of the water discharged from treatment plants; (i) management and mitigation measures and criteria, including measures to address impacts on groundwater dependent ecosystems; (j) groundwater inflow to the excavations to enable a full accounting of the groundwater take from the Sydney Basin Central Groundwater Source; (k) reporting of groundwater gauging at excavations, groundwater monitoring, groundwater trigger events and action responses; and (l) methods for providing the data collected to Sydney Water where discharges are directed to their assets.	<ul style="list-style-type: none"> <li>SSTOM SWMP, Rev 01, 11/7/2023, includes: <ul style="list-style-type: none"> <li>Surface Water Monitoring Program</li> <li>Groundwater Construction Monitoring Program, Rev A, dated 11/5/2023</li> </ul> </li> <li>ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023</li> </ul>	C	<p>The Groundwater Construction Monitoring Program forms part of the SWMP and was endorsed by the ER in a letter dated 11/7/2023. Section 1.3.1 Conditions of Approval, and Table 1 of the Groundwater Monitoring Program detail how these conditions have been addressed.</p> <p>The Groundwater Monitoring Program was undergoing review at the time of the audit to align with the SBT Groundwater Monitoring Program, and would be implemented once the review had been endorsed / approved. Groundwater monitoring requirements had not been triggered for SSTOM at the time of this audit.</p>
C17	With the exception of any <b>Construction Monitoring Programs</b> expressly nominated by the Planning Secretary to be endorsed by the ER, all <b>Construction Monitoring Programs</b> must be submitted to the Planning Secretary for approval.	<ul style="list-style-type: none"> <li>DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> <li>Sydney Metro WSA Staging Report Rev10, May 2023</li> </ul>	C	<p>The WSA SSTOM Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI (in the case of the Noise &amp; Vibration and Surface Water monitoring programs) in a letter dated 4/8/2023.</p> <p>The Sydney Metro WSA Staging Report sets out the requirement for ER Endorsement and DPHI approval roles for the SSTOM CEMP, Sub-plans and monitoring programs, which have been applied for the project.</p>
C18	The <b>Construction Monitoring Programs</b> not requiring the Planning Secretary's approval must obtain the endorsement of the ER as being in accordance with the conditions of approval and all undertakings made in the documents listed in Condition A1. Any of these <b>Construction Monitoring Programs</b> must be submitted to the ER for endorsement at least one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	<ul style="list-style-type: none"> <li>ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023</li> <li>ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023</li> <li>Sydney Metro WSA Staging Report Rev10, May 2023</li> </ul>	C	<p>ER Endorsement Letters were sighted for the SSTOM Air Quality and Groundwater Construction monitoring programs.</p> <p>As set out in Table 4-6 of the Sydney Metro WSA Staging Report, the Air Quality and Groundwater Construction monitoring programs require ER Review and Endorsement only (i.e. no requirement for approval of the Planning Secretary).</p> <p>The SSTOM Air Quality and Groundwater Construction monitoring programs, were approved by the ER in letters dated 28/6/2023 and 11/7/2023 respectively.</p> <p>Construction for SSTOM commenced on 8/8/2023.</p> <p>SSTOM CEMP &amp; Sub-plans (and Construction Monitoring Programs within) were submitted to the ER for endorsement no later than one month before the commencement of SSTOM in accordance with Condition C18.</p>
C19	Any of the <b>Construction Monitoring Programs</b> which require Planning Secretary approval must be endorsed by the ER and then submitted to the Planning Secretary for approval at least one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	<ul style="list-style-type: none"> <li>SSTOM CEMP, Rev 01, 19/7/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023, includes: <ul style="list-style-type: none"> <li>Noise and Vibration Monitoring Program</li> </ul> </li> <li>SSTOM SWMP, Rev 01, 11/7/2023, includes: <ul style="list-style-type: none"> <li>Surface Water Monitoring Program</li> </ul> </li> <li>DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> </ul>	C	<p>The WSA SSTOM CEMP and Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI in a letter dated 4/8/2023.</p> <p>As set out in the Sydney Metro WSA Staging Report, the Noise &amp; Vibration and Surface Water Construction monitoring programs require DPHI Approval.</p> <p>Construction for SSTOM commenced on 8/8/2023.</p> <p>SSTOM CEMP &amp; Sub-plans (and Construction Monitoring Programs within) were submitted to the Planning Secretary for approval no later than one month before the commencement of SSTOM in accordance with Condition C19.</p>
C20	Unless otherwise agreed with the Planning Secretary, construction must not commence until the Planning Secretary has approved, or the ER has endorsed (whichever is applicable), all of the required <b>Construction Monitoring Programs</b> and all relevant baseline data for the specific construction activity has been collected.	<ul style="list-style-type: none"> <li>ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023</li> <li>ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023</li> <li>Sydney Metro WSA Staging Report Rev10, May 2023</li> <li>DPHI CEMP &amp; Sub-plan approval letter: <ul style="list-style-type: none"> <li>WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023</li> </ul> </li> <li>Baseline Noise Measurement Plan ver. A dated 24 Feb 2023</li> <li>Groundwater Monitoring Program Rev A</li> <li>Air Quality Construction Monitoring Program Rev 0.0</li> <li>Soil and Water Management Plan, Rev 00</li> </ul>	C	<p>The WSA SSTOM Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI in a letter dated 4/8/2023.</p> <p>Construction for WSA SSTOM commenced on 8/8/2023.</p> <p>Stage 2 CEMP &amp; Sub-plans (and Construction Monitoring Programs within) were submitted to DPHI for approval no later than one month before the commencement of SSTOM in accordance with Condition C20.</p> <p>Baseline data for air quality, noise, groundwater and water quality were verified to be included in the corresponding CEMP Sub-plans, endorsed by the ER and approved by DPHI.</p>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C21	The <b>Construction Monitoring Programs</b> , as approved by the Planning Secretary or the ER has endorsed (whichever is applicable), including any minor amendments 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 or the ER (whichever is applicable), whichever is the greater.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SSTOM AQMP, Rev 01, 20/7/2023</li> <li>Appendix B Air Quality Monitoring Program</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>Appendix B Noise &amp; Vibration Monitoring Program</li> <li>SSTOM SWMP, Rev 01, 17/7/2023</li> <li>Surface Water Monitoring Program - Appendix B</li> <li>Groundwater Monitoring Program - (in progress)</li> <li>SMWSA SSTOM Noise &amp; Vibration Construction Monitoring Report, February 2024</li> <li>EPL 21807 Monitoring Report July 2024</li> <li>EPL 21807 Monitoring Report June 2024</li> <li>EPL 21807 Monitoring Report May 2024</li> <li>EPL 21807 Monitoring Report April 2024</li> <li>EPL 21807 Monitoring Report March 2024</li> </ul>	C	<p>Reporting timeframes for SSTOM Construction Monitoring Programs are summarised below:</p> <ul style="list-style-type: none"> <li>Noise &amp; Vibration Monitoring Program - Six-monthly</li> <li>Air Quality Monitoring Program - Annual</li> <li>Groundwater Monitoring Program - (TBC - in progress at the time of the audit)</li> <li>Surface Water Monitoring Program - Annual</li> </ul> <p>The first Noise &amp; Vibration Monitoring Report for SSTOM was prepared, dated February 2024 and covers the monitoring period from 4 Aug 2023 - 3 February 2024.</p> <p><b>Note: Annual reporting timeframes for Air Quality, Groundwater and Surface Water monitoring were due and should cover the monitoring period from 8 August 2023 to 8 August 2024. The Draft reports were not available for review at the time of this audit. It is also noted that the Groundwater Monitoring Program was not included as an appendix to the SWMP on the project website and remained under review at the time of the audit.</b></p> <p>The SSTOM Noise &amp; Vibration Construction Monitoring Report February 2024 sets out the results of implementation of the Noise &amp; Vibration Construction Monitoring Program.</p> <p>Noise mitigation measures as per Condition E74 are set out in the WSA SSTOM NVMP, and are defined for specific scenarios in Out of Hours Work (OOHW) Permits.</p> <p>EPL noise and vibration monitoring reports are available on the ParkLife Metro website and also demonstrate evidence of implementation of the Noise &amp; Vibration Construction Monitoring Program.</p> <p>ER Monthly Reports and ER Inspection Reports also provide evidence of the review and implementation of monitoring requirements as set out in monitoring programs.</p> <p>EPL Monitoring Reports are prepared monthly and were available on the PLM project website. EPL Monitoring Reports include the results of Weather, Noise &amp; Vibration, Water, Surface Water and Discharge to water monitoring.</p>
C22	The results of the <b>Construction Monitoring Programs</b> must be submitted to the Planning Secretary, ER and relevant regulatory agencies, for information in the form of a <b>Construction Monitoring Report</b> at the frequency identified in the relevant <b>Construction Monitoring Program</b> .  <i>Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.</i>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SSTOM AQMP, Rev 01, 20/7/2023</li> <li>Appendix B Air Quality Monitoring Program</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>Appendix B Noise &amp; Vibration Monitoring Program</li> <li>SSTOM SWMP, Rev 01, 17/7/2023</li> <li>Surface Water Monitoring Program - Appendix B</li> <li>Groundwater Monitoring Program - in progress</li> <li>SM-WSA SSTOM Noise &amp; Vibration Construction Monitoring Report February 2024, Rev01 dated 5/6/2024</li> <li>NV Monitoring Report Feb 2024 Submission to DPHI, dated 9/7/2024</li> <li>NV Monitoring Report Feb 2024 Submission to ER, (various review correspondence, dated 26/4/2024-5/7/2024)</li> </ul>	C	<p>The SSTOM Noise &amp; Vibration Construction Monitoring Report February 2024 was prepared during the audit period and covers the period from 4 August 2023 - 3 February 2024, dated 5/6/2024.</p> <p>The SSTOM Noise &amp; Vibration Construction Monitoring Report February 2024 was submitted to DPHI on 9/7/2024.</p> <p>A six-monthly reporting frequency is specified in the Noise and Vibration Monitoring Program. Section 6.3.1 of the NV Monitoring Program states "The Construction Monitoring Reports will be submitted to the Planning Secretary, ER, Water NSW (where applicable and in accordance with REMM NV2) and the EPA upon request, in accordance with Condition C22. The Construction Monitoring Reports will be submitted six-monthly for the duration of SSTOM Works". It is noted that the 2nd SSTOM NV CMR will be due for submission to DPHI by 9/1/2025.</p> <p>Evidence of submission the SSTOM Noise &amp; Vibration Construction Monitoring Report February 2024, dated 5/6/2024 to DPHI and the ER was sighted. Submission to DPHI was dated 9/7/2024.</p> <p>It is understood that work around the WaterNSW canal had not commenced at the time of the audit so submission to WaterNSW was not triggered. Submission to EPA is upon request only.</p> <p><b>Note: Annual reporting timeframes for Air Quality, Groundwater and Surface Water monitoring were due and should cover the monitoring period from 8 August 2023 to 8 August 2024. The Draft reports were not available for review at the time of this audit. It is also noted that the Groundwater Monitoring Program was not included as an appendix to the SWMP on the project website and remained under review at the time of the audit.</b></p>

Item
Project Name: SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client: ParkLife Metro / Sydney Metro
Auditor: Morasey Environment Pty Ltd
Audit Details: Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No. MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>PART E</b>				
<b>KEY ISSUE CONDITIONS</b>				
<b>AIR QUALITY</b>				
E1	All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction.	<ul style="list-style-type: none"> <li>Site inspection, 14/08/2024</li> </ul>	C	<p>Dust suppression measures were observed during the site inspection including hoses, wheel wash, application of polymer to batters, and water carts. Site accesses were mainly constructed with hardstand, or stabilised with rumble grids in place.</p> <p>There were no odours noted during the audit inspection.</p> <p>A gurney was available for use at the cattle grid at Orchard Hills; a wheel wash utilising recycled water was in use at St Marys. Water carts were provided (x2 @SMF, 1x Orchard Hills, &amp; 1x Luddenham); a sweeper was in use at St Marys (predominantly hardstand). Sweepers were also setup in the station box to reduce WHS related dust risk as well as reducing sediment load in sumps.</p> <p><b>Observation 6:</b> Internal haul roads at the Orchard Hills site were muddy and chip seal that had reportedly been applied 2 months prior had washed away and/or sunk into the ground. De-stabilised haul roads in use by heavy vehicles could contribute to sediment load diverted to sediment basins, dust emissions, and increase the risk of sediment laden runoff from the HV access to Lansdowne Road. The Site Supervisor advised further stabilisation would be undertaken as necessary.</p> <p><b>Recommendation:</b> Review options and apply suitable mitigation measures for the ongoing stabilisation of internal haul roads.</p>
<b>BIODIVERSITY AND TREES</b>				
<b>Biodiversity Credits</b>				
E2	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities and threatened species habitat.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SSI-10051 IEA No 4 by Wolfpeak, September 2023</li> <li>Flora and Fauna Management Plan, Rev00 dated 15/6/2023</li> <li>Interview with Auditees</li> <li>Site inspection, 14/8/2024</li> </ul>	NT	<p>The clearing of trees for the SM-WSA corridor was undertaken by SCAW prior to the SSTOM works commencing. During clearing and grubbing SCAW collected and stored separately any useful removed landscape materials for re-use in the project in fauna crossings, etc. As per the Independent Audit 4 finding (Wolfpeak), the only clearing conducted on SBT sites during the audit period has been at Orchard Hills to facilitate SSTOM.</p> <p>This has been minimal. The clearing process is consistent with the approved FFMP.</p> <p>No clearing or re-use of native vegetation has occurred during the audit period under the SSTOM package.</p>
E3	Impacts to plant community types must not exceed those identified in the documents listed in <b>Condition A1</b> , unless otherwise approved by the Planning Secretary. In requesting the Planning Secretary's approval, an assessment of the additional impact(s) to plant community types and an updated ecosystem and / or species credit requirement under Condition E4 below, if required, must be provided.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection, 14/8/2024</li> <li>Flora and Fauna Management Plan, Rev00 dated 15/6/2023</li> <li>Letter from SM to DPHI RE: Condition E7 - Evidence of the retirement of credits or payment to secure offsets, dated 13/5/2024</li> <li>Post Approval Form_20240514005704, SSTOM - CoA E7 letter, DPHI Submission, dated 14/5/2024</li> </ul>	NT	<p>No clearing of the plant community types identified has occurred in SSTOM package scope areas during the audit period. Section 6.2 of the FFMP states "Sites will be handed over to Parklife Metro D&amp;C generally cleared and stabilised with all major earthworks completed and for this reason SSTOM Works have limited potential to impact biodiversity. However until detailed design is further progressed, and the full extent of clearing is completed by prior Works contractors, Parklife Metro D&amp;C is unable to confirm if any areas will require clearing as part of SSTOM Works".</p> <p>On 13/5/2024 Sydney Metro issued a letter to DPHI summarising Condition E3 biodiversity credit allocation and submission of proof of retirement credits. SSTOM has been allocated one biodiversity credit for Plant Community Type (PCT) 724.</p> <p>The existing environment had been significantly altered by the time of handover to the SSTOM package contractor and ecosystem credits had been retired. In a letter to DPHI, dated 13/5/2024, in relation to the retirement of additional credits per Condition E3, Sydney Metro submitted evidence of payment into the Biodiversity Conservation Fund (BCF) prior to removal of native vegetation along Kent Road associated with utility works for the SSTOM construction stage. The letter refers to an attached certificate (BCF295) issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the <i>Biodiversity Conservation Act 2016</i> (BC Act) as evidence of payment into the BCF in satisfaction of CoA E5 as it relates to the SSTOM construction stage.</p> <p>The letter also notes "the BCF payment documented in the section 6.33 certificates only relate to the additional credits sought under CoA E3 per the Departments approval ... Should SMWSA need to retire further credits for their works, another submission to the Department would be made".</p>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
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<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations																																														
E4	<p>Prior to impacts on the biodiversity values set out in <b>Table 3</b> and <b>Table 4</b>, the number and classes of ecosystem credits and species credits (like-for-like) must be retired. <b>Note: Credits have been calculated using the Biodiversity Assessment Method.</b></p> <table border="1"> <caption>Table 3: Ecosystem credits</caption> <thead> <tr> <th>Plant Community Type (PCT) ID and name</th> <th>Number of Credits</th> </tr> </thead> <tbody> <tr> <td>726 Broad-leaved heath - Grey Shrub - Melaleuca decora grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion</td> <td>246</td> </tr> <tr> <td>835 Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion</td> <td>217</td> </tr> <tr> <td>848 Grey Shrub - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion</td> <td>202,204</td> </tr> <tr> <td>1835 Swamp Oak open forest on riverbanks of Cumberland Plain and Hunter Valley</td> <td>181</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>646,648</b></td> </tr> </tbody> </table> <table border="1"> <caption>Table 4: Species credits required</caption> <thead> <tr> <th>Species</th> <th>Number of Credits</th> </tr> </thead> <tbody> <tr><td><i>Amorpha canescens</i> (Synaptic Swallow)</td><td>21</td></tr> <tr><td><i>Amorpha canescens</i> (Common Swallow)</td><td>64</td></tr> <tr><td><i>Alcedinides glaucoides</i></td><td>57</td></tr> <tr><td><i>Chrysomitris chrysotis</i> (White-breasted Warbler)</td><td>64</td></tr> <tr><td><i>Dryobates borealis</i></td><td>21,72</td></tr> <tr><td><i>Grewia juniperina</i> subsp. <i>juniperina</i> (Juniper-leaved Greivolia)</td><td>67,462</td></tr> <tr><td><i>Grewia parviflora</i> subsp. <i>parviflora</i> (Small-flowered Greivolia)</td><td>32</td></tr> <tr><td><i>Melanotrochilodes subsp. sandstonei</i> (Sandstone parrotbill) <i>Melanotrochilodes</i> <i>arctura</i> N. Br. subsp. <i>arctura</i></td><td>122</td></tr> <tr><td><i>Melanotrochilodes subsp. sandstonei</i></td><td>42</td></tr> <tr><td><i>Pyrrhuloxia sula</i> (Sulphur Finch)</td><td>18</td></tr> <tr><td><i>Rhipidura flabellifera</i> (Black-winged Stilt)</td><td>22</td></tr> <tr><td><i>Vulpes parviflora</i></td><td>19,31</td></tr> <tr><td><i>Melanotrochilodes subsp. sandstonei</i></td><td>158</td></tr> <tr><td>Cumberland Plain Lard Grass</td><td></td></tr> <tr><td>Myotis Aescopus (Southern Myotis)</td><td>260</td></tr> <tr><td><b>TOTAL SPECIES CREDITS</b></td><td><b>539,444</b></td></tr> </tbody> </table>	Plant Community Type (PCT) ID and name	Number of Credits	726 Broad-leaved heath - Grey Shrub - Melaleuca decora grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion	246	835 Forest Red Gum - Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion	217	848 Grey Shrub - Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion	202,204	1835 Swamp Oak open forest on riverbanks of Cumberland Plain and Hunter Valley	181	<b>TOTAL</b>	<b>646,648</b>	Species	Number of Credits	<i>Amorpha canescens</i> (Synaptic Swallow)	21	<i>Amorpha canescens</i> (Common Swallow)	64	<i>Alcedinides glaucoides</i>	57	<i>Chrysomitris chrysotis</i> (White-breasted Warbler)	64	<i>Dryobates borealis</i>	21,72	<i>Grewia juniperina</i> subsp. <i>juniperina</i> (Juniper-leaved Greivolia)	67,462	<i>Grewia parviflora</i> subsp. <i>parviflora</i> (Small-flowered Greivolia)	32	<i>Melanotrochilodes subsp. sandstonei</i> (Sandstone parrotbill) <i>Melanotrochilodes</i> <i>arctura</i> N. Br. subsp. <i>arctura</i>	122	<i>Melanotrochilodes subsp. sandstonei</i>	42	<i>Pyrrhuloxia sula</i> (Sulphur Finch)	18	<i>Rhipidura flabellifera</i> (Black-winged Stilt)	22	<i>Vulpes parviflora</i>	19,31	<i>Melanotrochilodes subsp. sandstonei</i>	158	Cumberland Plain Lard Grass		Myotis Aescopus (Southern Myotis)	260	<b>TOTAL SPECIES CREDITS</b>	<b>539,444</b>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection, 14/8/2024</li> <li>Flora and Fauna Management Plan, Rev00 dated 15/6/2023</li> <li>Letter from SM to DPHI RE: Condition E7 - Evidence of the retirement of credits or payment to secure offsets, dated 13/5/2024</li> </ul>	C	<p>No clearing of the plant community types identified has occurred in SSTOM package scope areas during the audit period. As per previous audit finding on SBT and SCAW, ecosystem credits have been retired prior to impact during previous construction activities.</p> <p>On 13/5/2024 Sydney Metro issued a letter to DPHI summarising E3 biodiversity credit allocation and submission of proof of retirement credits. SSTOM has been allocated one biodiversity credit for PCT 724.</p>
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E5	The requirement to retire like-for-like ecosystem credits and species credits in <b>Condition E4</b> may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem credits and species credits.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection, 14/8/2024</li> <li>Flora and Fauna Management Plan, Rev00 dated 15/6/2023</li> <li>Letter from SM to DPHI RE: Condition E7 - Evidence of the retirement of credits or payment to secure offsets, dated 13/5/2024</li> <li>Post Approval Form_20240514005704, SSTOM - CoA E7 letter, DPHI Submission, dated 14/5/2024</li> </ul>	C	<p>No clearing of the plant community types identified have occurred in SSTOM package scope areas during the audit period. Section 4 of the FFMP refers to BDAR, EIS and Submissions Report. The existing environment had been significantly altered by the time of handover to SSTOM package contractor and ecosystem credits had been retired.</p> <p>The maximum number of credits has been purchased - (as managed by the Sydney Metro Planning team). At this stage it is not expected that more credits would be required. Refer to Condition E7 for more information.</p>																																														
E6	Where evidence of compliance with the <u>Ancillary rules: Reasonable steps to seek like-for-like biodiversity credits for the purpose of applying the variation rules</u> has been provided to the Planning Secretary, variation rules may be applied to retire the relevant ecosystem credits and species credits as set out in the BAM Biodiversity Credit Report (Variation).	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection, 14/8/2024</li> <li>Flora and Fauna Management Plan, Rev00 dated 15/6/2023</li> <li>E6 - SM to Confirm applicability to SSTOM (RFI 2)</li> </ul>	NT	The existing environment has been significantly altered by the time of handover to SSTOM package contractor and ecosystem credits had been retired.																																														
E7	Evidence of the retirement of credits in satisfaction of <b>Condition E4</b> or payment to the Biodiversity Conservation Fund in satisfaction of <b>Condition E5</b> must be provided to the Planning Secretary prior to impacts on the biodiversity values.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection, 14/8/2024</li> <li>Flora and Fauna Management Plan, Rev00 dated 15/6/2023</li> <li>Letter from SM to DPHI RE: Condition E7 - Evidence of the retirement of credits or payment to secure offsets, dated 13/5/2024</li> <li>Post Approval Form_20240514005704, SSTOM - CoA E7 letter, DPHI Submission, dated 14/5/2024</li> </ul>	C	<p>The existing environment has been significantly altered by the time of handover to SSTOM package contractor and ecosystem credits had been retired. In a letter to DPHI, dated 13/5/2024, in relation to the retirement of additional credits per CoA E3, Sydney Metro submitted evidence of payment into the Biodiversity Conservation Fund (BCF) prior to removal of native vegetation along Kent Road associated with utility works for the SSTOM construction stage. The letter refers to an attached certificate (BCF295) issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the Biodiversity Conservation Act 2016 (BC Act) as evidence of payment into the BCF in satisfaction of CoA E5 as it relates to the SSTOM construction stage.</p> <p>The letter also notes "the BCF payment documented in the section 6.33 certificates only relate to the additional credits sought under CoA E3 per the Departments approval' ... Should SMWSA need to retire further credits for their works, another submission to the Department would be made".</p>																																														
<b>Key Fish Habitat</b>																																																		
E8	The Proponent must minimise impacts to Key Fish Habitat (KFH) as defined in <i>Policy and Guidelines for Fish Habitat Conservation and Management</i> (DPI, 2013 update). Residual impacts to KFH, following the implementation of habitat rehabilitation or other environmental compensation measures, must be offset at a ratio of 2:1 habitat offset requirement in accordance with the <i>Policy and Guidelines for Fish Habitat Conservation and Management</i> (DPI, 2013 update) and in consultation with DPI Fisheries.	N/A	NT	Not Applicable to SSTOM as per Appendix B of the Staging Report, Rev 10, 22 May 2024																																														
E9	Where offsets are required in accordance with <b>Condition E8</b> , payment of the habitat offset requirement must be made to the DPI Fish Conservation Trust Fund prior to the commencement of Work that impacts KFH.	N/A	NT	Not Applicable to SSTOM as per Appendix B of the Staging Report, Rev 10, 22 May 2024																																														
E10	Where offsets are required in accordance with <b>Condition E8</b> , the Proponent must submit to the Planning Secretary a receipt confirming payment to the DPI Fish Conservation Trust Fund within one (1) month of making the payment.	N/A	NT	Not Applicable to SSTOM as per Appendix B of the Staging Report, Rev 10, 22 May 2024																																														

Item
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Nest Boxes</b>				
E11	Nest Boxes must be installed one (1) month prior to any removal of existing tree hollows and/or the release of any captured hollow dependent fauna.	N/A	NT	Not Applicable to SSTOM as per Appendix B of the Staging Report, Rev 10, 22 May 2024
<b>Re-use of Timber</b>				
E12	<p>Prior to vegetation clearing, the Proponent must identify where it is practicable for the CSSI to reuse native trees and vegetation that are to be removed. If it is not possible for the CSSI to reuse removed native trees and vegetation, the Proponent must consult with the relevant council(s), NSW National Parks &amp; Wildlife Service, Western Sydney Parklands Trust, Greater Sydney Local Land Services, Landcare groups, DPI Fisheries and any additional relevant government agencies to determine if:</p> <p>(a) hollows, tree trunks (greater than 25-30 centimetres in diameter and 2-3 metres in length), mulch, bush rock and root balls salvaged from native vegetation impacted by the CSSI; and</p> <p>(b) collected plant material, seeds and/or propagated plants from native vegetation impacted by the CSSI, could be used by others in habitat enhancement and rehabilitation work, before pursuing other disposal options.</p>	N/A	NT	Not Applicable to SSTOM as per Appendix B of the Staging Report, Rev 10, 22 May 2024
E13	<p>Revegetation and the provision of replacement trees must be informed by a Tree Survey undertaken during detailed design. The Tree Survey must identify the number, type and location of any trees to be removed, except for trees that are offset under <b>Condition E4</b>. The Tree Survey must be submitted to the Planning Secretary for information with the <b>Place, Urban Design and Corridor Landscape Plan</b> required under <b>Condition E79</b>.</p> <p>Where trees are to be removed, the Proponent must provide a net increase in the number of replacement trees at a ratio of 2:1, except trees that are offset under <b>Condition E4</b>. Replacement trees must have a minimum pot size consistent with the relevant authority's plans / programs / strategies for vegetation management, street planting, or open space landscaping, or as agreed by the relevant authority(ies).</p> <p><b>Note:</b> For the purposes of this condition, the relevant authority is that State or local government authority that owns or manages the land on which the replacement trees will be planted.</p>	<ul style="list-style-type: none"> <li>• Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>• Stage 1 Place, Urban Design and Corridor Landscape Plan (PUDCLP) Ver 0, November 2023</li> </ul>	NT	<p>There has been no revegetation required during the SSTOM package works to-date and therefore no tree survey has been required. As per Section 1.6 of the Stage 1 Place, Urban Design and Corridor Landscape Plan (PUDCLP), the clearing of trees for the corridor was undertaken by SCAW prior to the SSTOM works commencing.</p> <p>Section 1.5.2 of the PUDCLP states "The provision of replacement trees is a key outcome of the project. New tree planting is to be at a ratio of 2:1, except trees that are offset under Condition E4 (biodiversity credits). This requirement will be addressed in the Corridor Landscape Master Plan in the future Stage 2 SSTOM PUDCLP".</p> <p>The Stage 2 SSTOM PUDCLP was in draft at the time of the audit.</p> <p>The SSTOM project has been left with felled hollow-bearing trees from SCAW for reuse as habitat features at the Orchard Hills site.</p>
<b>Watercourse Crossings</b>				
E14	<p>The Proponent must design the watercourse crossings and the east-west regional corridor (Patons Lane) crossing to achieve the following objectives:</p> <p>(a) design of viaducts to retain and minimise clearing/disturbance of native vegetation and maximise native plant growth under the structures;</p> <p>(i) maintain and/or improve riparian/terrestrial connectivity under the viaduct and bridge structures to maximise the corridor function;</p> <p>(ii) maximise the viaduct and bridge structures span over the riparian corridor and/or remnant native vegetation whichever is the widest;</p> <p>(iii) minimise the clearing/disturbance of native vegetation and native riparian vegetation; and</p> <p>(iv) maximise light and moisture penetration under the viaduct and bridge structures to support native plant growth;</p> <p>(b) design of culverts and other crossings incorporate the following into the design to provide for movement of aquatic and terrestrial fauna.</p> <p>(i) elevated "dry" cells to encourage terrestrial movement, and recessed "wet" cells to facilitate the movement of aquatic fauna;</p> <p>(ii) maximise light penetration into the culvert structures;</p> <p>(iii) a naturalised base along the bed of the culvert; and 'fauna furniture' (such as rocks, logs, ropes and ledges) to facilitate fauna movement to maintain connectivity and provide fauna passage.</p> <p>(c) design of scour protection using natural solutions such as the revegetation of banks with local native species; and</p> <p>(d) details of remnant native vegetation including riparian vegetation.</p> <p>The Proponent must consult with DPIE EES, DPI Fisheries and engage suitably qualified experts in fauna crossing design to achieve the outcomes of this condition.</p> <p><b>Note:</b> These design objectives must form part of the Place, Urban Design and Corridor Landscape Plan required under Condition E79.</p>	<ul style="list-style-type: none"> <li>• Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>• Stage 1 Place, Urban Design and Corridor Landscape Plan (PUDCLP) Ver 0, November 2023</li> <li>• PUDCLP - Luddenham and SMF (Rev 0)_FINAL for IC</li> </ul>	NT	<p>The Stage 1 SSTOM PUDCLP refers to the SCAW PUDCLP for requirements and design of fauna crossings which states that fauna crossing proposals will be reviewed with DPIE EES and DPI Fisheries. The requirement to consult with these stakeholders has not occurred for design, and is due to commence in the near future but the date has not been confirmed at the time of the audit.</p> <p>Sections 1.5 and 1.6 of the SSTOM Stage 1 PUDCLP state "This requirement is not applicable to the scope of this Stage 1 SSTOM PUDCLP as it only applies to the design of the rail corridor, and does not apply to the Luddenham Station building or the Stabling and Maintenance Facility which Stage 1 PUDCLP addresses".</p> <p>NB: Three future watercourse crossings are proposed later in the project for the Linewide portion of the SSTOM Project.</p>



Item
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<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations																										
<b>FLOODING</b>																														
E15	<p>The CSSI must be designed and constructed with the objective of not exceeding the flood impacts presented in the documents listed in <b>Condition A1</b> or the flood impact criteria in <b>Table 5</b>, whichever is greater, within and in the vicinity of the CSSI for all flood events up to and including the one (1) per cent Annual Exceedance Probability (AEP) flood event.</p> <p><b>Table 5: Flood Impact Criteria</b></p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Location</th> <th>Criteria</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Afflux</td> <td rowspan="2">Land zoned as residential, industrial or commercial, and critical infrastructure</td> <td>Maximum 10 mm to buildings that are flood prone in existing conditions</td> </tr> <tr> <td>No new above floor flooding</td> </tr> <tr> <td rowspan="2">Roads</td> <td>Maximum 50 mm where flooding is below floor level</td> </tr> <tr> <td>Maximum 50 mm</td> </tr> <tr> <td rowspan="2">Velocity</td> <td rowspan="2">All areas</td> <td>Maximum 100 mm</td> </tr> <tr> <td>Velocities are to remain below 1 metre per second. Where existing velocities exceed 1 metre per second, increase by less than 10 per cent</td> </tr> <tr> <td rowspan="2">Flood hazard</td> <td>Residential and commercial land</td> <td>No increase in the flood hazard or risk to life</td> </tr> <tr> <td>Roads</td> <td>No increase in the flood hazard or risk to life</td> </tr> <tr> <td rowspan="3">Flood duration</td> <td>Residential and commercial buildings</td> <td>No increase to duration of above floor flooding</td> </tr> <tr> <td>Roads</td> <td>No more than one hour increase</td> </tr> <tr> <td>Crown land, open space, farming, grazing and cropping land</td> <td>No more than one hour increase</td> </tr> </tbody> </table> <p>the same outcome must be incorporated into the detailed design of the CSSI.</p>	Parameter	Location	Criteria	Afflux	Land zoned as residential, industrial or commercial, and critical infrastructure	Maximum 10 mm to buildings that are flood prone in existing conditions	No new above floor flooding	Roads	Maximum 50 mm where flooding is below floor level	Maximum 50 mm	Velocity	All areas	Maximum 100 mm	Velocities are to remain below 1 metre per second. Where existing velocities exceed 1 metre per second, increase by less than 10 per cent	Flood hazard	Residential and commercial land	No increase in the flood hazard or risk to life	Roads	No increase in the flood hazard or risk to life	Flood duration	Residential and commercial buildings	No increase to duration of above floor flooding	Roads	No more than one hour increase	Crown land, open space, farming, grazing and cropping land	No more than one hour increase	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Flood Modelling Report Design Stage 1 Rev A 6/7/2023</li> <li>Flood Modelling Report Design Stage 2, dated 17/4/2024</li> <li>Soil and Water Management Sub-plan</li> </ul>	NT	<p>It is understood that the flood design is ongoing. It is the responsibility of the design engineers and nominated review parties as per Condition E15 to verify compliance with E15 once all information is made available.</p> <p>Flooding is considered with regard to Condition E15 during design and construction.</p> <p>The requirements of Condition E15 relating to design will be addressed in the Design Reports and noted in the approved Soil and Water Management Sub-plan. Examples of design reports showing compliance with flood modelling parameters being met by design has been sighted. As per the flood modelling report provided for review, there are no departures or concessions applicable. It is noted that further compliance review is to be undertaken in future revisions of the flood modelling report.</p> <p>It is understood that the SCAW project owns the majority of flood-associated risks.</p> <p>Section 6.1.1.3 of the PLM Flood Modelling Report Design Stage 2, dated 17/4/2024 addressed flood impacts from SSTOM versus Aerotropolis Core Precinct Design and states "SSTOM accordingly has no responsibility to demonstrate conformance to SSI 10051 E15 since the impacts outside of the works area are generated by the Precinct Design and the flood mitigations for the Precinct Design are basins outside the limits of SSTOM works".</p> <p>Section 6 of the PLM Flood Modelling Report Design Stage 2, dated 17/4/2024 addresses compliance with Condition E15 for a number of locations and scenarios.</p> <p>Table 10 of the PLM Flood Modelling Report Design Stage 2, dated 17/4/2024 sets out assumptions, dependencies and constraints associated with flood modelling.</p> <p>NB: It is not the role of the Auditor to ensure flood modelling is completed to meet the requirements of Conditions E15-E18. The Auditor relies on statements provided by suitably qualified and experienced flood engineers or other specialists that may be engaged by the project to ensure the project meets compliance with flood-related conditions. Relevant extracts of the PLM flood design reports were reviewed during the audit, which does not constitute a full audit of flood-related requirements, which is the responsibility of the Proponent and Contractor.</p>
Parameter	Location	Criteria																												
Afflux	Land zoned as residential, industrial or commercial, and critical infrastructure	Maximum 10 mm to buildings that are flood prone in existing conditions																												
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E16	<p>Updated modelling that incorporates these measures and is calibrated and validated with consideration of the results of the Wianamatta-South Creek Catchment Flood Assessment prepared by Infrastructure NSW as part of Stage 2 of the South Creek Sector Review must be prepared by a suitably qualified flood consultant. The modelling must identify changes in post-development flood behaviour including cumulative flood impacts associated with Western Sydney International Airport and the M12, where this information is available, prior to detailed design being finalised.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Flood Modelling Report Design Stage 1 Rev A 6/7/2023</li> <li>Flood Modelling Report Design Stage 2, dated 17/4/2024</li> <li>Soil and Water Management Sub-plan</li> </ul>	NT	<p>As per the flood modelling report, there are no departures or concessions applicable. It is noted that further compliance review is to be undertaken in future revisions of the flood modelling report as design is finalised.</p> <p>As per Section 3.5, Table 10 of the Flood Modelling Report Design Stage 2, dated 17/4/2024, "certified FIW models from SBT &amp; SCAW Contracts are provided to SSTOM. Accordingly, SSTOM is dependent on the inherited Flood Models and prior conformance documented by the SCAW/SBT reports to CoA E16 which is applicable to all Construction contracts for SM-WSA".</p> <p>"It is noted that the SCAW permanent design scenario within the inherited SCAW flood model is not amended by SSTOM. SSTOM only amends the permanent design scenario to account for works undertaken by SSTOM. The SSTOM permanent design scenario flood assessment is accordingly the cumulative flood assessment of SBT, SCAW and SSTOM works. The SCAW inherited flood model (dependency) is: SMWSASCA-CPU-SWD-EW000-SD-M3D245000.A.S3.A.01.zip &amp; SMWSASCA-CPU-SWD-EW000SD-M3D-245001.A.S3.A.01.zip received March 2023.</p> <p>Regarding to the Flood Modelling undertaken by SBT, SCAW and WSI provided to SSTOM by SM. SSTOM assumes that:  * Flood modelling provided to SSTOM by SM is fit for purpose of the SM-WSA Project  * Flood modelling provided to SSTOM by SM is conforming to the SSI CoA and PS requirements applicable the prior model development".</p> <p>NB: It is not the role of the Auditor to ensure flood modelling is completed to meet the requirements of Conditions E15-E18. The Auditor relies on statements provided by suitably qualified and experienced flood engineers or other specialists that may be engaged by the project to ensure the project meets compliance with flood-related conditions. Relevant extracts of the PLM flood design reports were reviewed during the audit, which does not constitute a full audit of flood-related requirements, which is the responsibility of the Proponent and Contractor.</p>																										
E17	<p>Where flooding characteristics exceed the levels identified in Condition E15 above the Proponent must undertake the following:  (a) consult with affected landowners for properties adversely flood affected as a result of the CSSI regarding appropriate mitigations; and  (b) consult with the NSW State Emergency Service (SES) and Relevant Council(s) regarding the management of any continuous and residual flood risk from rarer flood events larger than the 1 per cent AEP and up to the probable maximum flood.</p> <p>In the event that the Proponent and the affected landowner cannot agree on the measures to mitigate the impact as described in <b>Condition E15</b>, the Proponent must engage a suitably qualified and experienced independent person to advise and assist in determining the impact and relevant mitigation measures.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Flood Modelling Report Design Stage 1 Rev A 6/7/2023</li> <li>Flood Modelling Report Design Stage 2, dated 17/4/2024</li> <li>Soil and Water Management Sub-plan</li> </ul>	NT	<p>This condition has not been triggered to-date for the SSTOM package. Condition E17 provides a mechanism to mitigate floodplain impacts which are non-conforming to the E15 flood impact criteria. According to the Flood Modelling Report Design Stage 2, dated 17/4/2024, the project is conforming to Condition E15.</p>																										
E18	<p>Flood information including flood reports, models and geographic information system outputs must be provided to the DPIE PDPS, Relevant Council(s), DPIE EES and the SES in order to assist in preparing relevant documents and to reflect changes in flood behaviour as a result of the CSSI. The DPIE PDPS, Relevant Council(s), DPIE EES and the SES must be notified in writing that the information is available no later than one (1) month following the completion of construction.</p> <p>Information requested by the DPIE PDPS, Relevant Council(s), DPIE EES or the SES must be provided no later than six (6) months following the completion of construction or within another timeframe agreed with the DPIE PDPS, Relevant Council(s), DPIE EES and the SES. The project flood models and data must be uploaded to the NSW Flood Data Portal and access must be provided to the DPIE PDPS, Relevant Council(s), DPIE EES and SES no later than one (1) month following the completion of construction.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Flood Modelling Report Design Stage 1 Rev A 6/7/2023</li> <li>Flood Modelling Report Design Stage 2, dated 17/4/2024</li> <li>Soil and Water Management Sub-plan</li> </ul>	NT	<p>This condition has not been triggered as construction is still underway.</p>																										
<b>HERITAGE</b>																														
<b>NON-ABORIGINAL HERITAGE</b>																														

Item
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<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2 WSA SSTOM August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E19	The Proponent must not destroy, modify or otherwise physically affect any Heritage item not identified in documents referred to in <b>Condition A1</b> . Unexpected heritage finds identified by the CSSI must be managed in accordance with the Unexpected Heritage Finds and Human Remains Procedure outlined in Conditions E34 to E36. Consideration of avoidance and redesign to protect unexpected finds of state heritage significance must be addressed where this condition applies.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Non-Aboriginal Heritage Management Plan (NAHMP), Rev01, dated 17/7/2022</li> <li>Unexpected Heritage Find Recording Form, dated 11/4/2024</li> </ul>	C	<p>Section 4 of the Non-Aboriginal Heritage Management Plan (NAHMP) lists Non-Aboriginal heritage items that could potentially be impacted by the SSTOM works.</p> <p>There has been no known damage to Heritage items during the project.</p> <p>On 10/4/2024 an animal bone was uncovered at the Aerotropolis Core Site and the Unexpected Heritage Finds Procedure was implemented. An Unexpected Heritage Finds Recording Form was completed, dated 11/4/2024 and included details of the find - "The end of a bone was observed protruding from the dirt on the edge of the ridge of a large mound of what appears to be imported material. The bone was inspected and possessed both ends of the bone and did not show any indication of butchering. The bone was a long bone (from a limb) that measured approximately 18cm in length. It was determined that the bone belonged to a sheep or goat".</p> <p>No unexpected finds of state heritage significance have been encountered.</p>
E20	The dismantling and reassembly of the jib crane at St Marys Station, if required, must only be undertaken under the supervision of a consultant experienced in the conservation of heritage machinery.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	<p>Management of the jib crane at St Marys is set out in Section 6.8.1 of the NAHMP, and would require preparation of a detailed methodology should be jib crane require relocation. Exclusion zones are set out in Section 6.11 of the NAHMP and will include the jib crane and Goods Shed within the St Marys Railway Station Group.</p> <p>It is understood that disassembly of the jib crane is unlikely to be required during SSTOM.</p>
E21	The St Marys Goods Shed must not be destroyed, modified or otherwise adversely affected, except as identified in the documents listed in Condition A1.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Non-Aboriginal Heritage Management Plan (NAHMP), Rev01, dated 17/7/2023</li> </ul>	C	<p>No damage has reportedly occurred to the St Marys Goods Shed during the audit period. Any works that impact the Goods Shed would be the subject of a planning approval modification.</p> <p>Exclusion zones are set out in Section 6.11 of the NAHMP and will include the jib crane and Good Shed within the St Marys Railway Station Group.</p>
E22	The <b>Archaeological Research Design</b> included in the documents listed in <b>Condition A1</b> must be implemented during construction.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro – Western Sydney Airport Non-Aboriginal Archaeological Research Design, Artefact, April 2021</li> <li>Non-Aboriginal Heritage Management Plan (NAHMP), Rev01, dated 17/7/2022</li> </ul>	NT	<p>The Archaeological Research Design (ARD) forms Appendix K to the Submissions Report. The ARD is relevant at St Marys and will form part of the future precinct works for services.</p> <p>The requirement for an Archaeological Method Statement (AMS) on the project is set out in Section 6.6 of the SSTOM NAHMP.</p> <p>An activity-specific AMS will be required for SSTOM works for ground disturbing activities in the area of the St Marys Goods Yard and Shed, and the Excavation Director will determine whether monitoring or a test excavation program is necessary. Ground disturbing works have not been undertaken by SSTOM in this area at the time of the audit.</p> <p>Archaeological excavations under an AMS had not been conducted at the time of the audit, but would be required to be undertaken in accordance with the Archaeological Research Design and Excavation Methodology(s), as set out in Section 6.7 of the NAHMP.</p>
E23	Before commencement of archaeological excavation, the Proponent must, in consultation with Heritage NSW, nominate a suitably qualified <b>Excavation Director</b> , who complies with Heritage Council of NSW's <i>Criteria for Assessment of Excavation Director</i> (September 2019), to oversee and advise on matters associated with historical archaeology for the approval of the Planning Secretary. The <b>Excavation Director</b> must be present to oversee excavation, advise on archaeological issues, advise on the duration and extent of oversight required during archaeological excavations consistent with the <b>Archaeological Research Design and Excavation Methodology(s)</b> identified in the documents listed in <b>Condition A1</b> . More than one <b>Excavation Director</b> may be engaged for CSSI to exercise the functions required under the conditions of this approval.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro – Western Sydney Airport Non-Aboriginal Archaeological Research Design, Artefact, April 2021</li> <li>Letter from SM to DPHI RE SMWSA - CoA E23 - Submission of Nominated Excavation Director, dated 16/8/2023</li> <li>Letter from DPHI to SM RE: Excavation Direction Nomination / Approval, dated 5/9/2023</li> </ul>	NT	<p>No archaeological excavation has been undertaken to date for SSTOM.</p> <p>An Excavation Director was nominated/approved for the project in a letter from DPHI dated 5/9/2023.</p>
E24	Archival photographic digital recording must be undertaken for all listed heritage items which will be affected by the CSSI. The recordings must be undertaken prior to the commencement of Work which may impact the items and documented in an <b>Archival Recording Report</b> . The recordings must include buildings, structures and landscape features and detailed maps showing the location of features. The archival recording must be prepared in accordance with <i>How to Prepare Archival Records of Heritage Items</i> (NSW Heritage Office, 1998) and <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i> (NSW Heritage Office, 2006).	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Existing Condition Survey Report, Tram Sheds, St Marys, Rev 0, Land Surveys, 30/5/2023</li> <li>SMWSA - St Marys Station: Goods Shed alteration to ground level elevation, Statement of Heritage Impact, June 2022</li> <li>St Marys Railway Station, Archival Recording - Final Report, Biosis, Rev1, dated 11/1/2022</li> <li>Submission to DPHI, dated 30/10/2023</li> </ul>	C	<p>Archival recording reports for the St Marys Goods Shed have been prepared. The heritage-listed jib crane is covered in the 2022 Biosis Archival Recording Report.</p> <p>While outside the scope of this audit, auditees confirmed the Report was prepared after the commencement of Construction, but prior to potential physical impact in the subject areas.</p>
E25	The <b>Archival Recording Report</b> must be submitted to the Planning Secretary, relevant councils and Heritage NSW for information within 12 months of completing all work described in the documents listed in Condition A1 in relation to heritage items. Copies of the <b>Archival Recording Report</b> must also be provided to relevant local historical societies.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	Not triggered within the audit period.
E26	Following completion of all work described in the documents listed in <b>Condition A1</b> in relation to heritage items, a <b>non-Aboriginal Archaeological Excavation Report</b> including the details of further historical research either undertaken or to be carried out and archaeological excavations (with artefact analysis and identification of a final repository for finds) and addressing the research design, must be prepared in accordance with any guidelines and standards required by the Heritage Council of NSW and Heritage NSW.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	Not triggered within the audit period.
E27	The <b>non-Aboriginal Archaeological Excavation Report</b> must be submitted to the Planning Secretary, relevant councils and Heritage NSW for information within 12 months of completing all Work described in the documents listed in <b>Condition A1</b> in relation to heritage items. Copies of the <b>Report</b> must also be provided to relevant local historical societies and local libraries.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	Not triggered within the audit period.
<b>ABORIGINAL HERITAGE</b>				
E28	All reasonable steps must be taken so as not to harm, modify or otherwise impact Aboriginal objects or places of cultural significance except as authorised by this approval.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024</li> </ul>	C	<p>In November 2022 a Walk on Country was undertaken with the Connect with Country Working Group. Two culturally modified trees were identified by the group at Cosgroves Creek, noted by one of the attendees as having been in an area obscured by vegetation and inaccessible due to poor ground conditions and flooding during earlier surveys.</p> <p>The two trees were recorded on 23 November 2022 by Working Group representative Erin Wilkins (Darug Custodial Aboriginal Corporation (DCAC)) and Colin Davison (Sydney Metro Aboriginal Cultural Heritage Advisor). They were subsequently registered in AHIMS as sites Cosgrove Creek scar tree 1 (45-5-5667) and Cosgrove Creek scar tree 2 (45-5-5668).</p> <p>The presence of the scar trees will become relevant for the SSTOM project upon commencement of the PLM Linewide package of works, and will be assessed during IA3.</p> <p>No other AHIMS sites are known to occur within the project boundary.</p> <p>No damage is known to have occurred to the listed sites and works had not commenced in the Cosgrove Creek area.</p>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E29	The Registered Aboriginal Parties (RAPs) must be kept regularly informed about the CSSI. The RAPs must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of the CSSI throughout construction.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024</li> <li>Quarterly Registered Aboriginal Party (RAP) update, June 2024</li> </ul>	C	Evidence to support ongoing consultation with Registered Aboriginal Parties was provided via the Quarterly Registered Aboriginal Party (RAP) update, June 2024. The Aboriginal Cultural Heritage Excavation Report for Sydney Metro – Western Sydney Airport was finalised in early March 2024, to fulfil Condition E32 of the project's condition of approval. The report was prepared by AECOM, in consultation with RAPs. The final report was distributed to all RAPs registered on the Sydney Metro – Western Sydney Airport project on 8 March 2024. Section 2 of the report provides an overview of the Aboriginal community consultation undertaken to inform the preparation of the project's original and revised ACHARs, as well as the off-airport ACHMP. RAP participation in the SM-WSA salvage program is also detailed. No Aboriginal cultural heritage test and salvage excavations have been undertaken for SSTOM.
E30	The <b>Aboriginal Cultural Heritage Management Plan</b> included in the documents listed in <b>Condition A1</b> must be updated to include: <ul style="list-style-type: none"> <li>(a) a methodology for the completion of pedestrian surveys for all areas within the project footprint yet to be surveyed;</li> <li>(b) procedures for undertaking further test excavation and, if necessary, salvage excavations prior to the commencement of works in areas subject to further test excavation;</li> <li>(c) mapping that clearly outlines all areas yet to be subject to survey, test excavations, and salvage excavations;</li> <li>(d) a procedure to update mapping following the completion of survey, test excavations, and salvage excavations that detail the archaeological works conducted across the project footprint;</li> <li>(e) a procedure for updating the predictive model following the identification of new Aboriginal heritage items; and</li> <li>(f) a procedure to report and update the effectiveness of the following the completion of survey, test excavation activities or significant artefact finds.</li> </ul> <p>The updated Plan must be submitted to the Planning Secretary for information prior to works in areas identified for further test excavations.</p> <p><i>Note: Salvage excavations in the areas identified for salvage in documents in Condition A1, may occur prior to additional test excavations occurring.</i></p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024</li> <li>Sydney Metro WSA Independent Audit No.5 – Audit Report (SSTOM), GHD February 2024</li> </ul>	C	A detailed review of the Aboriginal Cultural Heritage Management Plan was conducted as part of the initial IEA and found to comply with Condition E30.
E31	The updated <b>Aboriginal Cultural Heritage Management Plan</b> must be implemented for the duration of salvage activities and construction.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024</li> </ul>	NT	Implementation of the Aboriginal Cultural Heritage Management Plan had not yet commenced for SSTOM. This is expected to occur upon commencement of the PLM Linewide package of works and will be assessed in the IA3 audit period.
E32	At the completion of Aboriginal cultural heritage test and salvage excavations, an <b>Aboriginal Cultural Heritage Excavation Report(s)</b> must be prepared by a suitably qualified person. The <b>Aboriginal Cultural Heritage Excavation Report(s)</b> must: <ul style="list-style-type: none"> <li>(a) be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, OEH 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010; and</li> <li>(b) document the results of the archaeological test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds).</li> </ul> <p>The <b>RAPs</b> must be given a minimum of 28 days to consider the report(s) and provide comments before the report(s) is finalised. The final report(s) must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, Gandangara LALC and Deurubbin LALC, the RAPs and local libraries within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024</li> <li>Sydney Metro WSA Independent Audit No.5 – Audit Report (SSTOM), GHD February 2024</li> </ul>	C	The Aboriginal Cultural Heritage Excavation Report for Sydney Metro – Western Sydney Airport was finalised in early March 2024, to fulfil condition E32 of the project's condition of approval. The report was prepared by AECOM, in consultation with RAPs. The final report was distributed to all RAPs registered on the Sydney Metro – Western Sydney Airport project on 8 March 2024. In the report, efforts were documented to salvage archaeological artefacts from four subsurface sites as well as from two surface sites. No Aboriginal cultural heritage test and salvage excavations have been undertaken for SSTOM.

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E33	Where previously unidentified Aboriginal objects or places of cultural significance are discovered, all work must immediately stop in the vicinity of the affected area. Works potentially affecting the previously unidentified objects or places must not recommence until Heritage NSW has been informed. The measures to consider and manage this process must be specified in the <b>Unexpected Heritage Finds and Human Remains Procedure</b> required by <b>Condition E34</b> and include registration in the Aboriginal Heritage Information Management System (AHIMS), where required.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024</li> </ul>	NT	No previously unidentified Aboriginal objects or places of cultural significance have been discovered for SSTOM.
<b>Unexpected Finds and Human Remains</b>				
E34	An <b>Unexpected Heritage Finds and Human Remains Procedure</b> must be prepared to manage unexpected heritage finds (heritage items and values) in accordance with any guidelines and standards prepared by the Heritage Council of NSW or Heritage NSW.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SSTOM NAHMP, Rev 01, 17/7/2023</li> <li>Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024</li> </ul>	C	The Unexpected Heritage Finds and Human Remains Procedure is included in the ACHMP.
E35	The <b>Unexpected Heritage Finds and Human Remains Procedure</b> must be prepared by a suitably qualified and experienced heritage specialist in consultation with the Heritage Council of NSW (with respect to non-Aboriginal cultural heritage) and in relation to Aboriginal cultural heritage, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010) and submitted to the Planning Secretary for information no later than one (1) month before the commencement of construction.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024</li> <li>Unexpected Heritage Find Recording Form, dated 11/4/2024</li> </ul>	C	<p>Unexpected Aboriginal heritage finds are to be managed in accordance with Section 6.24 of Sydney Metro's Unexpected Heritage Finds Procedure [SM-18-00105232], Appendix A to the ACHMP.</p> <p>Unexpected finds are addressed in Section 4.3 of the ACHMP.</p> <p>Two sites have been recorded to date following these unexpected find procedures (for the wider WSA project). In November 2022 a Walk on Country was undertaken with the Connect with Country Working Group. Two culturally modified trees were identified by the group at Cosgroves Creek.</p> <p>On 10/4/2024 an animal bone was uncovered and the Unexpected Heritage Finds Procedure was implemented for SSTOM. Refer to Condition E19 for details. No unexpected finds of state heritage significance have been encountered.</p>
E36	<p>The <b>Unexpected Heritage Finds and Human Remains Procedure</b>, as submitted to the Planning Secretary, must be implemented for the duration of construction.</p> <p>Where archaeological investigations have been undertaken as a result of Unexpected Finds notifications then a Final Archaeological Report must be provided in accordance with Heritage Council guidance and standard requirements for final reporting under Excavation Permits.</p> <p><b>Note:</b> 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. Management of human remains in NSW is subject to requirements set out in the Public Health Act 2010 (NSW) and Public Health Regulation 2012 (NSW). Nothing in these conditions prevents separate procedures for the <b>Unexpected Heritage Finds and Human Remains Procedure</b>.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024</li> <li>Unexpected Heritage Find Recording Form, dated 11/4/2024</li> </ul>	C	On 10/4/2024 an animal bone was uncovered and the Unexpected Heritage Finds Procedure was implemented for SSTOM. Refer to Condition E19 for details. No unexpected finds of state heritage significance have been encountered.
<b>NOISE AND VIBRATION</b>				
<b>Land Use Survey</b>				
E37	A detailed land use survey must be undertaken to confirm sensitive land use(s) (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration and construction ground-borne noise. The survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of work which generates construction noise, vibration or ground-borne noise in that area. The results of the survey must be included in the <b>Detailed Noise and Vibration Impact Statements</b> required under <b>Condition E47</b> .	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>SM-WSA SSTOM Noise and Vibration Construction Monitoring Report, February 2024</li> <li>WSA SSTOM, OHE Station, Concrete Works OOH and Batch Plant DNVIS, Rev 01, 5/6/2024</li> <li>WSA SSTOM, Stabling and Maintenance Facility, Site Works and Power Installation, Rev01, 30/5/2024</li> <li>Environment Protection Licence (EPL) 21807</li> </ul>	C	<p>The SSTOM CNVMP identifies noise catchment areas (NCAs) and sensitive receivers potentially exposed to project noise. Sensitive receiver information is determined via the Land Use Survey in the Detailed Noise and Vibration Impact Assessment (DNVIS).</p> <p>A DNVIS is prepared for each project site to predict the impact of project activities on nearby receivers, including noise and vibration sensitive receivers. The purpose of the DNVIS is to identify receivers with predicted levels above Noise Management Levels requiring Additional Mitigation Measures.</p> <p>There were two DNVIS' provided for review during the audit - Site Works and Power Installation (Stabling and Maintenance Facility) May 2024, and Concrete Works OOH and Batch Plant (Orchard Hills Station) June 2024. A Land Use Survey was prepared for both assessments and forms Appendix B to each DNVIS. The Sydney Metro and PLM Communications team hold knowledge of other sensitive land uses such as childcares, churches etc. but were not interviewed in relation to Condition E37.</p> <p>The ParkLife Metro EPL governs project noise, with DNVIS' potentially resulting in EPL variations.</p>
<b>Construction Hours</b>				
E38	Work must only be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 6:00pm Saturdays; and (c) at no time on Sundays or public holidays.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>WSA SSTOM, OHE Station, Concrete Works OOH and Batch Plant DNVIS, Rev 01, 5/6/2024</li> <li>WSA SSTOM, Stabling and Maintenance Facility, Site Works and Power Installation DNVIS, Rev01, 30/5/2024</li> <li>Environment Protection Licence (EPL) 21807</li> </ul>	C	<p>Construction hours are documented in the SSTOM CNVMP and the DNVIS for each project site/activity.</p> <p>The SSTOM Orchard Hills Station, Concrete Works OOH and Batch Plant DNVIS predicts impacts related to the following three activities:</p> <ul style="list-style-type: none"> <li>Concrete Batching Plant Operation During Construction (Monday to Sunday - OOH)</li> <li>Concrete Works (Monday to Friday 6pm-10pm &amp; Saturday 1pm-4pm)</li> <li>Use of Site Office &amp; Amenities (Monday to Sunday - OOH)</li> </ul> <p>The DNVIS includes the verification of compliance against each applicable SSI 10051 Condition of Approval and EPL Condition and recommends whether the proposed works can be managed to comply with SSI 10051 and the EPL.</p> <p>The concrete batching plant had not commenced operation at the time of the audit. There were no known unapproved OOHW conducted during the audit period. OOHW takes place as permitted by EPL 21807.</p>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morayse Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Highly Noise Intensive Work</b>				
E39	Except as permitted by an EPL or approved in accordance with the Out-of-Hours Works Protocol required by Condition E42, 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 1:00 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.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> </ul>	NT	Auditees advised there have been no highly noise intensive works conducted for SSTOM to date.
E40	This approval does not permit blasting.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> </ul>	NT	No blasting is known to have been undertaken for the project.
<b>Variation to Work Hours</b>				
E41	Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances: (a) Safety and Emergencies, including: (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (ii) 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; or (b) Low impact, including: (i) construction that causes LAeq(15 minute) noise levels: <ul style="list-style-type: none"> <li>no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and</li> <li>no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); and</li> </ul> (ii) construction that causes: <ul style="list-style-type: none"> <li>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</li> <li>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); or</li> </ul> (c) By Approval, including: (i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or (ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E42; or (iii) negotiated agreements with directly affected residents and sensitive land user(s); or (d) By Prescribed Activity, including: (i) tunnelling and ancillary support activities (excluding cut and cover tunnelling and surface works not directly supporting tunnelling) are permitted 24 hours a day, seven days a week; or (ii) grout batching at the Orchard Hills construction site is permitted 24 hours per day, seven days per week; or (iii) delivery of material that is required to be delivered outside of standard construction hours in Condition E38 to directly support tunnelling activities, except between the hours 10:00 pm and 7:00 am to / from the Orchard Hills ancillary facility; or (iv) haulage of spoil generated through tunnelling is permitted 24 hours per day, seven days per week except between the hours of 10:00 pm and 7:00 am to / from the Orchard Hills construction site; or (v) works within an acoustic enclosure are permitted 24 hours a day, seven days a week where there is no exceedance of noise levels or intermittent vibration levels under Low impact circumstances identified in Condition E41(b), unless otherwise agreed with the Planning Secretary; or (vi) tunnel and underground station box fit out works are permitted 24 hours per day, seven days per week. On becoming aware of the need for emergency work in accordance with (a)(i) above, the ER, the Planning Secretary and the EPA must be notified of the reasons for such work. The Proponent must use best endeavours to notify as soon as practicable all noise and/or vibration affected sensitive land user(s) of the likely impact and duration of those work.  <b>Notes:</b> 1. Tunnelling does not include station box excavation. 2. Tunnelling ancillary support activities includes logistics support and material handling and delivery	<ul style="list-style-type: none"> <li>Interview with ER, 19/8/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro WSA ER Monthly Report March 2024, dated 7/4/2024</li> <li>Sydney Metro WSA ER Monthly Report April 2024, dated 7/5/2024</li> <li>Sydney Metro WSA ER Monthly Report May 2024, dated 7/6/2024</li> <li>Sydney Metro WSA ER Monthly Report June 2024, dated 5/7/2024</li> <li>ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3</li> <li>OOH Work Permit No. 036 -Bradfield OOH Waterproofing and Concrete finishing Works Rev A, approved 6/8/2024</li> <li>OOH Work Permit No. 014 - OHE OSOM Deliveries Rev06, approved 23/7/2024</li> <li>OOH Work Permit No. 022 - OHE OOH Concrete Works Rev03, approved 2/8/2024</li> <li>OOH Work Permit No. 020 - SMF Earthworks 6am Early Start Rev01, approved 12/6/2024</li> <li>E41 - PLM OOHW Register</li> <li>E41(c) (ii) - PLM The Stabling and Maintenance Facility Earthworks Community Agreement E1.3 Report, Rev00, dated 15/5/2024</li> <li>DNVIS - STM - Concrete Works Rev01, dated 1/8/2024</li> <li>DNVIS - AEC - Concrete Works OOH Rev01, dated 26/6/2024</li> <li>DNVIS - Orchard Hills Utilities Rev00, dated 30/4/2024</li> <li>Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 004, dated 3/7/2024</li> <li>NCR 004 - OHE Generator Noise DPHI submission (SSI-10051-PA-464), dated 12/8/2024</li> </ul>	NC	<p>(a) Condition E68(a) was not triggered during the audit period:</p> <p>(b) (i) Low Impact Works undertaken during the audit period include Oversize Deliveries and Waterproofing. These activities are approved via an Out of Hours Works (OOHW) Permit process. The SSTOM OOHW Register was provided for review during the audit and includes a propose calendar of works so potential cumulative impacts can be assessed. There were seven instances of SSTOM OOHW undertaken during the audit period including: ATL Enabling Works on-airport; Extended earthworks (6am starts) at the SMF; Concrete pours and waterproofing at Orchard Hills; and electrical steel testing in the St Marys station box (5am). Examples of OOHW Permits were reviewed for Bradfield Waterproofing and Concrete finishing Works, and Oversize Deliveries for Orchard Hills, and for OOH Concrete works at St Marys and AEC. The DNVIS for utilities works at Orchard Hills was also provided.</p> <p>Data is reported six-monthly in the Noise and Vibration Construction Monitoring Report (CMR) to DPHI. The SSTOM Noise and Vibration Construction Monitoring Report, February 2024 was made available for review during the audit, and submission to DPHI verified.</p> <p>(ii) - Not triggered.</p> <p>(c) (i) &amp; (ii) - Not triggered.</p> <p>(iii) - A Negotiated Agreement is in place for spoil import from 6am at the SMF site. PLM requested the agreement of the community to consent to earthworks activities 6am to 7am M-F and 1pm-4pm Saturdays for works planned from May-August 2024. The agreement includes a DNVIS, proposes additional mitigation measures, and summarises consultation conducted throughout the process. Corresponding OOHW Permits were provided for review.</p> <p>(d) No OOHW outside of the EPL reported.</p> <p><b>Self-Reported Non-Compliance (E41(b)(i)):</b> NCR 004 was raised against Condition E41(b)(i) and related to operational noise from a generator at the SSTOM Orchard Hills site. Notification of the NC to DPHI was within the required 7-day timeframe, and a response from DPHI was received. A193</p>

Item
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Out-Of-Hours Work Protocol – Work not subject to an EPL</b>				
E42	<p>An <b>Out-of-Hours Work Protocol</b> must be prepared to identify a process for the consideration, management and approval of work (not subject to an EPL) that is outside the hours defined in <b>Conditions E38 and E39</b>. The Protocol must be approved by the Planning Secretary before commencement of the out-of-hours work. The Protocol must be prepared in consultation with the ER. The Protocol must provide:</p> <p>(a) justification for why out-of-hours work need to occur;</p> <p>(b) identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where:</p> <p>(i) the ER reviews all proposed out-of-hours activities and confirms their risk levels;</p> <p>(ii) low risk activities that can be approved by the ER; and</p> <p>(iii) high risk activities that are approved by the Planning Secretary;</p> <p>(c) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria;</p> <p>(d) a process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods consistent with the requirements of <b>Condition E56</b>. The measures must take into account the predicted noise levels and the likely frequency and duration of the out-of-hours works that sensitive land user(s) would be exposed to, including the number of noise awakening events;</p> <p>(e) procedures to facilitate the coordination of out-of-hours work including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided; and</p> <p>(f) notification arrangements for affected receivers for all approved out-of-hours works and notification to the Planning Secretary of approved low risk out-of-hours works.</p> <p>This condition does not apply if the requirements of <b>Condition E41</b> are met.</p> <p><b>Note:</b> <i>Out-of-hours work is any work that occurs outside the construction hours identified in <b>Condition E38 and E39</b>.</i></p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>Sydney Metro WSA Out of Hours Work Protocol v2.0, dated 8/11/2021</li> </ul>	C	<p>Reference to the OOHW Protocol is included in the SSTOM CNVMP, but all out of hours works during the audit period were reportedly conducted under the EPL for PLM.</p> <p>Refer previous audits for details of OOHW Protocol approval and consultation, and verification of Protocol contents in accordance with Condition E42.</p>
<b>Construction Noise Management Levels and Vibration Criteria</b>				
E43	<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) preferred vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure);</p> <p>(c) Australian Standard AS 2187.2 - 2006 "Explosives - Storage and Use - Use of Explosives" (for human exposure);</p> <p>(d) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and</p> <p>(e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage).</p> <p>Any work identified as exceeding the noise management levels and / or vibration criteria must be managed in accordance with the <b>Noise and Vibration CEMP Sub-plan</b>.</p> <p><b>Note:</b> <i>The ICNG identifies 'particularly annoying' activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction Noise Management Level.</i></p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>WSA SSTOM, OHE Station, Concrete Works OOH and Batch Plant DNVIS, Rev 01, 5/6/2024</li> <li>SMWSA SSTOM Noise and Vibration Construction Monitoring Report, February 2024</li> <li>OOH Work Permit No. 036_Bradfield OOH Waterproofing and Concrete finishing Works Rev A, approved 6/8/2024</li> <li>OOH Work Permit No. 014 - OHE OSOM Deliveries Rev06, approved 23/7/2024</li> <li>OOH Work Permit No. 022 - OHE OOH Concrete Works Rev03, approved 2/8/2024</li> <li>OOH Work Permit No. 020 - SMF Earthworks 6am Early Start Rev01, approved 12/6/2024</li> <li>E41 – PLM OOHW Register</li> </ul>	C	<p>Noise and vibration standards and guidelines adopted for the Project are listed in Section 6 of the SSTOM NVMP. Section 6.4 of the SSTOM NVMP addresses Condition E43 and the recommended limits outlined in DIN 4150 to ensure minimal risk of cosmetic damage to residential and industrial buildings.</p> <p>In accordance with CSSI 10051, a DNVIS is to be prepared for each construction site before construction noise and vibration impacts commence for any work that may exceed the NMLs, vibration criteria and / or groundborne noise levels specified in Conditions E43 and E44 at any residence outside construction hours identified in Condition E38, or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under Condition E87.</p> <p>Each DNVIS includes the verification of compliance against each applicable SSI 10051 Condition of Approval, and EPL Conditions and recommends whether the proposed works can be managed to comply with SSI 10051 and the EPL.</p> <p>A sample of OOH Permits was reviewed during the audit. Mitigation measures are included in each OOHW Permit.</p> <p>There were no potentially vibration impacted receivers identified during the audit period.</p>
E44	<p>All reasonable and feasible mitigation measures must be applied when the following residential ground-borne noise levels are exceeded:</p> <p>(a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and</p> <p>(b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A).</p> <p>The mitigation measures must be outlined in the <b>Noise and Vibration CEMP Sub-plan</b>, including in any <b>Out-of-Hours Work Protocol</b>, required by <b>Condition E42</b>.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>WSA SSTOM, OHE Station, Concrete Works OOH and Batch Plant DNVIS, Rev 01, 5/6/2024</li> </ul>	C	<p>Ground-borne noise has not been identified as an issue relevant to SSTOM during the audit period.</p> <p>Ground-borne noise criteria is set out in Section 6.2 of the SSTOM NVMP; Potential impacts associated with ground-borne noise are set out in Section 7.2.3 of the SSTOM NVMP. PLM has predicted that ground-borne noise impacts for SSTOM are expected to be negligible and are not anticipated to result in negative community reaction. The application of mitigation measures in Section 9 of the CNVMP for the control of airborne noise emissions and vibration is expected to adequately address ground-borne noise.</p> <p>There were no complaints received about ground-borne noise during the audit period.</p>
E45	<p>Noise generating work in the vicinity of potentially-affected community, religious, educational institutions and noise and vibration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) resulting in noise levels above the NMLs must not be timetabled within sensitive periods, unless other reasonable arrangements with the affected institutions are made at no cost to the affected institution.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>WSA SSTOM, OHE Station, Concrete Works OOH and Batch Plant DNVIS, Rev 01, 5/6/2024</li> </ul>	NT	<p>Condition E45 has not been relevant during the audit period.</p>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
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<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Construction Noise and Vibration Mitigation and Management</b>				
E46	Industry best practice construction methods must be implemented where reasonably practicable to ensure that noise and vibration levels are minimised around sensitive land use(s). Practices may include, but are not limited to:  (a) use of regularly serviced low sound power equipment; (b) at source control, temporary noise barriers (including the arrangement of plant and equipment) around noisy equipment and activities such as rock hammering and concrete cutting; (c) use of non-tonal reversing alarms; and (d) use of alternative construction and demolition techniques.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>Site inspection, dated 14/8/2024</li> <li>WSA SSTOM, OHE Station, Concrete Works OOH and Batch Plant DNVIS, Rev 01, 5/6/2024</li> <li>E46(a) – Sound power level check for tower crane, St Marys, undated</li> <li>E46(a) – Sound power level check for generator, Orchard Hills, undated</li> </ul>	C	<p>Noise mitigation measures as per Condition E46 are set out in the SSTOM NVMP, and are defined for specific scenarios in DNVIS' and Out of Hours Work (OOHW) Permits.</p> <p>(a) Plant and equipment service records are managed via the MEX system. Sound Power Level measurements were reviewed for the tower crane at St Marys, and recommendations for the application of acoustic shields was in the process of being implemented at the time of the audit. Sound Power Level measurements for the Orchard Hills generator were also provided for review. <b>Refer E41(b)(i) for more information.</b></p> <p>(b) At source noise controls were observed during the site inspection. Noise blankets had been placed around the top perimeter of the station box, and under hoarding facing residential receivers at St Marys. A noise shed and noise blankets had been placed around the generator at Orchard Hills. It is noted that the generator was in the process of being relocated to ensure noise levels at nearest receivers were compliant with applicable NMLs.</p> <p>(c) Pre-start checks include a check for reversing alarms (no beepers allowed).</p> <p>(d) Examples of the use of alternative construction and demolition techniques was discussed and included a the use of day makers utilising batteries or solar rather than generators. There was no demolition undertaken during the audit period.</p>
E47	Detailed Noise and Vibration Impact Statements (DNVIS) must be prepared for any work that may exceed the NMLs, vibration criteria and / or ground-borne noise levels specified in Conditions E43 and E44 at any residence outside construction hours identified in Condition E38, or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under Condition E87. The DNVIS must include specific mitigation measures identified through consultation with affected sensitive land user(s) and the mitigation measures must be implemented for the duration of the works. A copy of the DNVIS must be provided to the ER before the commencement of the associated works. The Planning Secretary and the EPA may request a copy (ies) of the DNVIS.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Interview with ER, 19/8/2024</li> <li>WSA SSTOM, OHE Station, Concrete Works OOH and Batch Plant DNVIS, Rev 01, 5/6/2024</li> <li>WSA SSTOM, Stabling and Maintenance Facility, Site Works and Power Installation, Rev01, 30/5/2024</li> </ul>	C	<p>DNVIS' have been prepared for each project site (and for specific activities) for SSTOM and were available on the project website. There were two DNVIS' provided for review during the audit - Site Works and Power Installation (Stabling and Maintenance Facility) May 2024, and Concrete Works OOH and Batch Plant (Orchard Hills Station) June 2024. A Land Use Survey was prepared for both assessments and forms Appendix B to each DNVIS. The purpose of the DNVIS is to identify receivers with predicted levels above Noise Management Levels requiring Additional Mitigation Measures, which are documented in Section 7.2 of each DNVIS.</p> <p>Sensitive receiver information in the DNVIS is captured from the attached Land Use Survey. In the case of the OHE Station, Concrete Works OOH and Batch Plant DNVIS the closest other noise sensitive receiver was identified as a childcare centre, located at the intersection of Kent Road and Caddens Road. While evidence of consultation with affected sensitive land user(s) is not included in the DNVIS, Section 7.1 notes that "consultation with affected receivers as per CCS will be ongoing".</p> <p>Implementation of the specific mitigation measures is verified by the PLM Environment Manager, and the ER during construction, as evidenced in ER inspection reports.</p> <p>The ER confirmed DNVIS are provided to him for review.</p>
E48	Owners and occupiers of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before works that generate vibration commences in the vicinity of those properties. If the potential exceedance is to occur more than once or extend over a period of 24 hours, owners and occupiers must be provided a schedule of potential exceedances on a monthly basis for the duration of the potential exceedances, unless otherwise agreed by the owner and occupier. These properties must be identified and considered in the Noise and Vibration CEMP Sub-plan.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>SMWSA SSTOM Noise and Vibration Construction Monitoring Report, February 2024</li> <li>Sydney Metro WSA ER Monthly Report March 2024, dated 7/4/2024</li> <li>Sydney Metro WSA ER Monthly Report April 2024, dated 7/5/2024</li> <li>Sydney Metro WSA ER Monthly Report May 2024, dated 7/6/2024</li> <li>Sydney Metro WSA ER Monthly Report June 2024, dated 5/7/2024</li> </ul>	NT	<p>Vibration monitoring results are summarised in ER Monthly Reports and Construction Monitoring Reports (there were no vibratory activities with the potential to affect buildings, structures or receivers identified during the audit period). There was therefore no vibration monitoring undertaken and no vibratory exceedances identified.</p> <p>The requirement to identify properties at risk of cosmetic damage is addressed in Section 6.4 of the SSTOM NVMP. Vibration screening criteria for cosmetic damage is listed in Table 17 of the SSTOM NVMP. The list of potentially affected residents for any particular scope is included in the DNVIS and/or OOHW Permit, rather than in the NVMP.</p> <p>It is understood that notification to properties at risk of exceeding vibration screening criteria would generally be captured in the notification process for noisy works.</p> <p>The Goods Shed at St Marys is expected to trigger the requirement for vibration monitoring later in the project. No SSTOM works have been undertaken within the minimum working distance of the Goods Shed to date.</p> <p>Section 6.4.3 of the SSTOM NVMP sets out the requirements for work near vibration sensitive structures, including heritage-listed structures.</p> <p>The EIS (Technical Paper 2) identified heritage receivers relevant to noise and vibration impacts associated with SSTOM Works which are summarised in in Table 25 of the SSTOM NVMP and include: St Marys Railway Station Group, Queen Street St Marys Post-War Commercial Building, St Marys Munitions Workers Housing, Four Winds - Dwelling &amp; Brick House (Claremont Meadows), Warragamba to Prospect Water Supply Pipelines and McGarvie-Smith Farm (off-airport corridor).</p>
E49	Where sensitive land use(s) are identified in Appendix B as exceeding the highly noise affected criteria during typical case construction, mitigation measures must be implemented with the objective of reducing typical case construction noise below the highly noise affected criteria at each relevant sensitive landuse(s). Activities that would exceed highly noise affected criteria during typical case construction must not commence until the measures identified in this condition have been implemented, unless otherwise agreed with the Planning Secretary.  <i>Note: Mitigation measures may include path barrier controls such as acoustic sheds and/or noise walls, at-property treatment, or a combination of path and at-property treatment.</i>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>SMWSA SSTOM Noise and Vibration Construction Monitoring Report, February 2024</li> </ul>	NT	<p>There have been no sensitive land use(s) identified for SSTOM exceeding the highly noise affected criteria during typical case construction during the audit period. The St Marys Station site has the closest residents to the project site and construction activities, but Condition E49 has not been triggered to date for SSTOM.</p>
E50	For all construction sites where acoustic sheds are installed, the sheds must be designed, constructed and operated to minimise noise emissions. This would include the following considerations:  (a) all significant noise producing equipment that would be used during the night-time would be inside the sheds, where feasible and reasonable; (b) noise generating ventilation systems such as compressors, scrubbers, etc. would be located inside the sheds and external air intake/discharge ports would be appropriately acoustically treated; and (c) the doors of acoustic sheds would be kept closed during the night-time period. Where night-time vehicle access is required at sites with nearby residences, the shed entrances would be designed and constructed to minimise noise breakout.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>SMWSA SSTOM Noise and Vibration Construction Monitoring Report, February 2024</li> </ul>	NT	<p>There are no acoustic sheds on SSTOM.</p>

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<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E51	Where <b>Condition E49</b> determines that at-property treatment (temporary or permanent) is the appropriate measure to reduce noise impacts, this at-property treatment must be offered to landowners of residential properties for habitable living spaces, unless other mitigation or management measures are agreed to by the landowner.  Landowners must be advised of the range of options that can be installed at or in their property and given a choice as to which of these they agree to have installed.  A copy of all guidelines and procedures that will be used to determine at-property treatment at their residence must be provided to the landowner.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>SMWSA SSTOM Noise and Vibration Construction Monitoring Report, February 2024</li> </ul>	NT	There have been no sensitive land use(s) identified for SSTOM exceeding the highly noise affected criteria during typical case construction during the audit period. The St Marys Station site has the closest residents to the project site and construction activities, but Condition E49 has not been triggered to date for SSTOM.
E52	Any offer for at-property treatment or the application of other noise mitigation measures in accordance with <b>Condition E51</b> , does not expire until the noise impacts specified in <b>Condition E49</b> , affecting that property are completed, even if the landowner initially refuses the offer.  <i>Note: If an offer has been made but is not accepted, this does not preclude the commencement of construction under <b>Condition E49</b>.</i>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>SMWSA SSTOM Noise and Vibration Construction Monitoring Report, February 2024</li> </ul>	NT	There has been no application of at-property treatment or other noise mitigation measures applicable to Condition E52 to date for SSTOM.
E53	The implementation of at-property treatment does not preclude the application of other noise and vibration mitigation and management measures including temporary and long term accommodation.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>SMWSA SSTOM Noise and Vibration Construction Monitoring Report, February 2024</li> </ul>	NT	There has been no application of at-property treatment or other noise mitigation measures applicable to Condition E53 to date for SSTOM.
<b>Construction Vibration Mitigation - Heritage Items</b>				
E54	Vibration testing must be conducted during vibration generating activities that have the potential to impact on Heritage items to verify minimum working distances to prevent cosmetic damage. In the event that the vibration testing and attended monitoring shows that the preferred values for vibration are likely to be exceeded, the Proponent must review the construction methodology and, if necessary, implement additional mitigation measures. Such measures must include, but not be limited to, review or modification of excavation techniques.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>ER Interview, 19/8/2024</li> </ul>	NT	There has been no vibration monitoring conducted for SSTOM to date and no vibration generating activities identified within minimum working distances with the potential to impact on Heritage items.
E55	The Proponent must seek the advice of a heritage specialist on methods and locations for installing equipment used for vibration, movement and noise monitoring at Heritage items.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>SMWSA SSTOM Noise and Vibration Construction Monitoring Report, February 2024</li> </ul>	NT	Vibration monitoring equipment was installed on the Goods Shed by SBT prior to their works commencing.  <b>NB: SSTOM will seek advise as to whether Condition E55 needs to be re-verified prior to the commencement of vibratory activities within minimum working distance of the Goods Shed.</b>
<b>Utility Coordination and Respite</b>				
E56	All work undertaken for the delivery of the CSSI, including those undertaken by third parties (such as utility relocations), must be coordinated to ensure respite periods are provided. The Proponent must: (a) reschedule any work to provide respite to impacted noise sensitive land use(s) so that the respite is achieved in accordance with Condition E57; or (b) consider the provision of alternative respite or mitigation to impacted noise sensitive land use(s); and (c) provide documentary evidence to the ER in support of any decision made by the Proponent in relation to respite or mitigation.  The consideration of respite must also include all other approved Critical SSI, SSI and SSD projects which may cause cumulative and / or consecutive impacts at receivers affected by the delivery of the CSSI.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> <li>Environmental Review ER 002 - Kent Road Watermain, approved 27/3/2024</li> <li>Environmental Review ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main, approved 29/4/2024</li> <li>DNVIS - Orchard Hills Utilities Rev00, dated 30/4/2024</li> </ul>	C	Auditees advised there have been no circumstances where Condition E56 has become an issue during SSTOM to date. Third party works relevant to E56 will be managed as per the DNVIS and OOHW procedures discussed elsewhere during the audit. The process for coordination and respite is defined in the CNVMP.  Environmental Reviews have been prepared for utility works on Kent Street & Samuel Marsden Roads, Orchard Hills. These works had not commenced at the time of the audit, but will be included in OOHW Permits and have been assessed in a specific DNVIS (Orchard Hills Utilities Rev00, dated 30/4/2024).  Utility works had not commenced at the time of the audit.
<b>Out-of-Hours Works – Community Consultation on Respite</b>				
E57	In order to undertake out-of-hours work outside the work hours specified under <b>Condition E38</b> , appropriate respite periods for the out-of-hours work must be identified in consultation with the community at each affected location on a regular basis. This consultation must include (but not be limited to) providing the community with: (a) a progressive schedule for periods no less than three (3) months, of likely out-of-hours work; (b) a description of the potential work, location and duration of the out-of-hours work; (c) the noise characteristics and likely noise levels of the work; and (d) likely mitigation and management measures which aim to achieve the relevant NMLs under <b>Condition E43</b> (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers).  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 ER, EPA and the Planning Secretary prior to the out-of-hours work commencing.  <i>Note: Respite periods can be any combination of days or hours where out-of-hours work would not be more than 5 dB(A) above the RBL at any residence.</i>	<ul style="list-style-type: none"> <li>Interview with ER, 19/8/2024</li> <li>Interview with Sydney Metro SSTOM Communications Manager, 16/8/2024</li> <li>PLM SMF - E57 The Stabling and Maintenance Facility Consultation Report, RevA, dated 28/5/2024</li> <li>PLM OOHW - E57 Orchard Hills Station Consultation Report, Rev01, dated 18/6/2024</li> </ul>	C	The application of Condition E57 for SSTOM is usually via a case by case assessment for RO and AA offers for sensitive receivers.  The Sydney Metro SSTOM Communications Manager was interviewed during the audit. The Comms Manager outlined the consultation process for OOHW.  E57 Consultation Reports were reviewed for the Stabling and Maintenance Facility (SMF) and Orchard Hills Station (OHE). Out of hours work at the SMF includes deliveries and bulk earthworks. Out of hours work at OHE includes deliveries of plant and equipment, extended work hours for concrete pours and concrete finishing works, and waterproofing within the station box and dive areas. E57 Consultation Reports provide a summary of consultation undertaken in accordance with E57 with respect to out of hours works activities at each site, and include at least a 3-month lookahead for proposed activities at each site. Maps of the distribution area are also included. Notifications are uploaded to the Sydney Metro website. Where impacted properties have not been able to be reached by doorknocking, SWMY slips are left at the property that include contact details to get in touch.  Consultation Reports were available on the PLM project website.



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<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Noise Mitigation - Operational Noise and Vibration Mitigation Measures</b>				
E58	<p>The Proponent must prepare an Operational Noise and Vibration Review (ONVR) to confirm noise and vibration mitigation measures that would be implemented for the Operation of the CSSI for the ultimate service. The ONVR must be prepared as part of the iterative design development and in consultation with the EPA, relevant council(s), other relevant stakeholders and must:</p> <p>(a) identify appropriate Operational noise and vibration objectives and levels for surrounding development, including existing and potential future (as known at the time of ONVR preparation) sensitive land use(s);  (b) confirm the operational noise and vibration predictions based on the expected final design.  Confirmation must be based on an appropriately calibrated noise model;  (c) identify sensitive landuses that are predicted to exceed:  (i) noise criteria set out in the Rail Infrastructure Noise Guideline (EPA, 2013), Noise Policy for Industry (EPA, 2017), and  (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing Vibration: a Technical Guideline (DECC, 2006);  (d) identify all noise and vibration mitigation measures including location, type and timing of mitigation measures, with a focus on:  (i) source control and design;  (ii) at the receiver (if relevant); and  (iii) 'best practice' achievable noise and vibration outcome for each activity;  (e) describe how the final suite of mitigation measures will achieve:  (i) the noise criteria outlined in the Rail Infrastructure Noise Guideline (EPA, 2013) and Noise Policy for Industry (EPA, 2017), and  (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing Vibration: a Technical Guideline (DECC, 2006);  (f) include a consultation strategy to seek feedback from directly affected landowners on the noise and vibration mitigation measures being offered;  (g) include procedures for operational noise and vibration complaints management, including investigation and monitoring (subject to complainant agreement).</p> <p>The ONVR must be verified by an independent acoustic expert and submitted to the Planning Secretary for approval before the implementation of any operational noise mitigation measures.</p> <p>The Proponent must implement the identified noise and vibration control measures and make the ONVR publicly available.</p> <p><b>Note:</b> The design of noise barriers and the like must be undertaken in consultation with the relevant stakeholders, including affected landowners and businesses (or a representative of a business), Western Parklands City Authority and relevant council(s) as part of the <b>Place, Urban Design and Corridor Landscape Plan</b> required under <b>Condition E79</b>.</p>	<p>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</p>	NT	<p>PLM's designer was preparing an Operational Noise and Vibration Review (ONVR) at the time of the audit. Consultation had commenced with the NSW EPA. The ONVR was not available for review during the audit.</p>
E59	<p>Operational noise mitigation measures as identified in <b>Condition E58</b> that will not be physically affected by work, must be implemented within six months of submitting the ONVR, unless otherwise agreed by the Planning Secretary.</p> <p>Where implementation of operational noise mitigation measures are not proposed to be implemented in accordance with this requirement, the Proponent must submit to the Planning Secretary a report providing justification as to why, along with details of temporary measures that would be implemented to reduce construction noise impacts, until such time that the operational noise mitigation measures are implemented.</p>	<p>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</p>	NT	<p>Not triggered during the audit period.</p>

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<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E60	<p>Within 12 months of the commencement of operation of the CSSI, the Proponent must undertake monitoring of operational noise to compare actual noise performance of the CSSI against the noise performance predicted in the review of noise mitigation measures required by <b>Condition E58</b>. An <b>Operational Noise and Vibration Compliance Report (ONVCR)</b> must be prepared to document this monitoring and include, but not necessarily be limited to:</p> <p>(a) noise and vibration monitoring to assess compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under <b>Condition E58</b>;</p> <p>(b) methodology, location and frequency of noise and vibration monitoring undertaken, including monitoring sites at which CSSI noise and vibration levels are ascertained, with specific reference to locations indicative of impacts on receivers;</p> <p>(c) a review of the performance of the CSSI against the:</p> <p>(i) operational noise levels in terms of criteria and noise goals established in the <i>NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017)</i>;</p> <p>(ii) vibration goals for human exposure for existing sensitive land use(s), as presented in <i>Assessing Vibration: a Technical Guideline (DECC, 2006)</i>;</p> <p>(d) details of any complaints and enquiries received in relation to Operational noise and vibration generated by the CSSI (between the date of commencement of Operation and the date the report was prepared);</p> <p>(e) an assessment of the performance and effectiveness of applied noise and vibration mitigation measures together with a review and if necessary, reassessment of mitigation measures;</p> <p>(f) identification of:</p> <p>(i) additional measures to meet the criteria outlined in the <i>NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017)</i>;</p> <p>(ii) additional measures to meet the vibration goals for human exposure for existing sensitive land, as presented in <i>Assessing Vibration: a Technical Guideline (DECC, 2006)</i>;</p> <p>(iii) when these measures are to be implemented; and</p> <p>(iv) how their effectiveness is to be measured and reported to the Planning Secretary and the EPA.</p> <p>The <b>ONVCR</b> must be submitted to the Planning Secretary and the EPA within 60 days of completing the Operational noise and vibration monitoring and made publicly available.</p> <p><b>Note:</b> Refer to <b>Condition B5</b> about how personal information will be handled.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	Not triggered during the audit period.
<b>PLACE, URBAN DESIGN AND VISUAL AMENITY</b>				
<b>Construction Sites</b>				
E61	Wayfinding information must be incorporated on temporary hoardings to guide pedestrians around the St Marys construction site and enhance their understanding and experience of the locality and space.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection 14/8/2024</li> <li>St Marys wayfinding signage – photo - RFI 2</li> </ul>	C	Wayfinding signage was installed on the hoarding around the St Marys station site, as observed during the site inspection and as per photo evidence in Section 6 of the audit report.
E62	The CSSI must be constructed in a manner that minimises visual impacts of construction sites including temporary landscaping and vegetative screening, minimising light spill, and incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located, wherever practicable.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection 14/8/2024</li> </ul>	C	Visual mitigation measures observed to be installed during the site inspection at St Marys and Orchard Hills stations included: Hoarding around the project site, and a spoil bund and retained remnant vegetation at the rear of the Orchard Hills site. Auditees advised visual mitigation measures were implemented during night works such as ensuring lights are directed away from receivers. There have been no complaints re visual impacts during the audit period.
<b>Design Requirements and Strategic Context</b>				
E63	<p>The CSSI must be designed with consideration of:</p> <p>(a) the design objectives, principles and guidelines identified in documents listed in <b>Condition A1</b>;</p> <p>(b) the principles and objectives of the draft Connecting with Country Framework;</p> <p>(c) relevant land use changes, masterplans and initiatives, where this information is known and/or available;</p> <p>(d) existing and proposed future local context and character; and</p> <p>(e) transport and land use integration and system functionality in the context of precincts, to the extent it is known and/or defined.</p> <p>Responses to items (a) – (e) must be reviewed by the <b>Design Review Panel (DRP)</b> to inform the design of permanent built works and landscape design of the CSSI. The outcome of the <b>DRP</b> review must be provided to the Planning Secretary prior to the submission of the <b>Place, Urban Design and Corridor Landscape Plan (PUDCLP)</b>.</p> <p><b>Note:</b> In accordance with <b>Condition A10</b> and <b>Condition A16</b>, the requirements of this condition can be staged.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility, Rev02 April 2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2 (on exhibition)</li> <li>SMWSA SSTOM – Stage 1 PUDCLP – E63 Compliance Statement, undated</li> </ul>	C	<p>The Place, Urban Design and Corridor Landscape Plan (PUDCLP) has been prepared to address the requirements of Condition E63 and was placed on public exhibition the week of 5/8/2024.</p> <p>SSTOM – Stage 1 PUDCLP – E63 Compliance Statement, undated was provided as evidence and outlines compliance with Condition E63, as verified by ParkLife Metro. The memo was submitted to the Planning Secretary for information prior to lodgement of the SSTOM PUDCLP:</p> <p>a) PLM's D&amp;C Contractor's design objectives, principles and guidelines have been documented within the PUDCLP at conceptual level to provide a point of reference for ongoing detailed design. Beyond the submission of the PUDCLP these objectives, principles and guidelines will be further evidenced in our Architectural Design Strategy for each station and area and implemented within the developed design to align with the intent of the EIS and Submissions Report.</p> <p>b) PLM's D&amp;C Contractor's response to the draft Connecting with Country Framework is documented within our PUDCLP submission and will be further verified in detailed design within the Architectural Design Strategy for each station and area. In addition to establishing the lineside response to the Connecting with Country Framework, each of the station designs is supported by a "Station Design Response" which articulates how the overall framework has been applied at each specific site. The Connecting with Country framework has been a foundation of our design development since the earliest stage of the Tender. Consultation with Sydney Metro's Connecting with Country Working Group is on-going.</p> <p>c) Where known, land use and master plans have been considered in design development.</p> <p>d) Existing conditions and future planning outcomes (where known) were considered in the design development.</p> <p>e) Transport and land use integration and system functionality (where defined) has been suitably considered in the design development.</p> <p>As per PLM's SSTOM contract, <b>DRP</b> consultation began in January 2023 on a bi-weekly basis in order to ensure that design excellence is being achieved.</p>

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<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Design Guidance and Standards - Lighting and Security</b>				
E64	<p>The CSSI must be constructed and operated with the objective of minimising light spill to surrounding properties. All lighting associated with the CSSI must be consistent with the requirements of:</p> <p>(a) ASINZS 4282:2019 <i>Control of the obtrusive effects of outdoor lighting, relevant Australian Standards in the series ASINZS 1158 - Lighting for Roads and Public Spaces;</i></p> <p>(b) NASF Guideline E: <i>Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports;</i> and</p> <p>(c) NASF Guideline C: <i>Managing the risk of wildlife strikes in the vicinity of airports.</i></p> <p>Mitigation measures must be provided to manage residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>ER Inspection Reports</li> <li>SSTOM Complaints Register February-August 2024</li> <li>Sydney Metro WSA SSTOM CEMP, Rev01, 19/7/2024</li> <li>OOHW Permits</li> </ul>	C	<p>The OOHW approval process includes an assessment of controls to be applied to minimise light spill during construction. Mitigation measures to manage any residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners are included in the approval process during night works.</p> <p>Auditees advised visual mitigation measures were implemented during night works such as ensuring lights are directed away from receivers. There have been no complaints re visual impacts during the audit period.</p>
<b>Design Guidance and Standards - Active Transport</b>				
E65	<p>Designs must have regard to the Movement and Place Framework relevant guidance including the <i>Walking Space Guide: Towards Pedestrian Comfort and Safety</i> (TINSW, 2020) and the <i>Cycleway Design Toolbox: Designing for Cycling and Micromobility</i> (TINSW, 2020).</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SSTOM Complaints Register February-August 2024</li> <li>Sydney Metro WSA SSTOM CEMP, Rev01, 19/7/2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility, Rev02 April 2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2 (on exhibition)</li> </ul>	NT	<p>Design remained in progress and was yet to be finalised. PUDCLP section 2 refers to design objectives and standards and section 6 refers to requirements of Condition E65.</p>
E66	<p>Active transport facilities must be designed, constructed and/or rectified in accordance with the Guide to Road Design Part 6A: Paths for Walking and Cycling (Austrroads, 2017) and relevant Australian Standards (AS) such as AS 1428.1-2009 Design for access and mobility. The active transport links must also incorporate relevant Crime Prevention Through Environmental Design principles.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SSTOM Complaints Register February-August 2024</li> <li>Sydney Metro WSA SSTOM CEMP, Rev01, 19/7/2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility, Rev02 April 2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2 (on exhibition)</li> </ul>	NT	<p>PUDCLP section 2 refers to Active transport design guidance and standards, sections 5-7 refer to the design guides and standards required by this condition being incorporated into the design.</p> <p>CPTED is currently addressed in the PUDCLP Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility. It is noted that further information for other stations and the Linewide works will be available in the future Stage 2 SSTOM PUDCLP.</p> <p>Section 2.5.2 - Community safety and privacy, provides details of the CPTED principles which have been applied to each station and includes consideration of: Direct sightlines; Mitigation of concealed spaces; CCTV; Precinct activation; and Lighting design and customer assistance. CPTED compliance will also be further considered in landscape design packages.</p>
<b>Design Review Panel and Design Review</b>				
<b>Panel Membership</b>				
E67	<p>The Proponent must establish an independent <b>DRP</b> to provide advice and recommendations to the Proponent during the CSSI's design development and construction to facilitate quality design and place outcomes. The <b>DRP</b> must be formed and hold its first meeting within six months of the date of this approval, or as otherwise agreed with the Planning Secretary.</p> <p><b>Note:</b> <i>Nothing in this approval prevents the use of an existing design panel as the Design Review Panel convened for this project where the function and composition of that panel complies with the terms of this approval.</i></p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> </ul>	C	<p>The Sydney Metro Design Review Panel (DRP) Terms of Reference, Western Sydney Airport Line were sighted and available on the project website. The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month.</p> <p>Participants are set out in Section 3 and include the <b>DRP</b> Chair and panel, including Panel Advisor, Coordinator and SM Project Advisor.</p> <p>Special advisors and external stakeholders may be invited periodically to participate in <b>DRP</b> meetings to advise on local issues and design outcomes as they relate to matters of interest.</p>
E68	<p>The responsibilities of the Design Review Panel include:</p> <p>(a) providing advice and recommendations to the Proponent for consideration in the design development of the CSSI</p> <p>(b) provide advice on the application of Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines to key design elements in relation to place making, architecture, heritage, urban and landscape design and artistic aspects of the CSSI; and</p> <p>(c) reviewing and endorsing any updates to the Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines.</p> <p>The Panel's advice must be consistent with the CSSI as approved.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> </ul>	C	<p>Roles and responsibilities of the <b>DRP</b> are set out in Section 3 of the Terms of Reference and align with Condition E68.</p>
E69	<p>The <b>DRP</b> must be chaired by the NSW Government Architect (or their nominee), and must be comprised of, where relevant, by suitably qualified, experienced and independent professional(s) in each of the fields of:</p> <p>(a) urban design and place making;</p> <p>(b) landscape architecture; and</p> <p>(c) architecture.</p> <p>The Panel may seek advice from suitably qualified, experienced independent professionals in other fields as required, including but not limited to sustainability, active transport and non-Aboriginal heritage. The Panel must also seek appropriate expertise to ensure Aboriginal cultural heritage and cultural values inform its advice.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> </ul>	C	<p>The role of the <b>DRP</b> Chair is set out in Section 3.1 of the <b>DRP</b> Terms of Reference and states <b>DRP</b> meetings are chaired by the NSW Government Architect or their nominee. In the event of their absence, the Chair may nominate an Alternative Chair from the regular Panel members.</p>
E70	<p>Panel members must be sourced from the NSW State Design Review Panel Pool or otherwise be approved by the NSW Government Architect.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> </ul>	C	<p>The responsibilities of Panel Members are set out in Section 3.2 of the <b>DRP</b> Terms of Reference.</p>

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NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Operation of the Design Review Process</b>				
E71	Prior to forming the <b>DRP</b> , a <b>Design Review Panel Terms of Reference</b> is to be developed and endorsed by the NSW Government Architect. The <b>Terms of Reference</b> must be submitted to the Planning Secretary once it is endorsed by the NSW Government Architect and:  (a) must be generally consistent with the NSW State Design Review Panel Terms of Reference (version 5); (b) outline the frequency of <b>DRP</b> meetings, coordinated with the Proponent's program requirements, as outlined in <b>Condition E76</b> , to ensure timely advice and design adjustment; and (c) identify cessation arrangements.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> </ul>	C	The SM-WSA DRP Terms of Reference has been prepared and is available on the project website. The DRP Terms of Reference (Western Sydney Airport line and Metro West) were endorsed by the Government Architect NSW on 4/3/2022. The DRP Terms of Reference was submitted to DPHI for information. The Terms of Reference addresses each part of E71 as follows: a) Section 3.2 of the DRP Terms of Reference commits to consistency with the NSW State Design Review Panel Terms of Reference b) The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month c) Cessation arrangements are set out in Section 5.
E72	The <b>DRP</b> must be operated and managed in accordance with the <b>Design Review Panel Terms of Reference</b> .	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> </ul>	C	Noted. As per evidence Conditions E67-E76.
E73	The NSW Government Architect must, after consultation with the Proponent, appoint an appropriately qualified and experienced design advisor to the <b>DRP</b> and may appoint an alternate design advisor. The advisor must attend meetings of the Panel. The advisor may also be invited by the Panel to assist with decisions regarding the Panel's recommendations and record the Panel's advice and recommendations.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> <li>GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024</li> <li>GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024</li> </ul>	C	Appointment of the Panel Advisor is addressed in Section 3.3 of the DRP Terms of Reference, including a list of responsibilities. As per the SDRP Terms of Reference, an alternate Panel advisor may also be appointed to attend where the Panel advisor is absent or unavailable. GANSW Principal Design Advisor Melizza Morales was appointed.
E74	The relevant council may be invited to the meetings of the Panel as observers or to provide feedback on key design elements of the CSSI.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> <li>GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024</li> <li>GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024</li> </ul>	C	Section 3 of the DRP Terms of reference sets out the procedure for special advisors and external stakeholders to be invited periodically to participate in DRP meetings to advise on local issues and design outcomes as they relate to matters of interest.
E75	<b>DRP</b> advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation must be included when submitting the final <b>PUDCLP</b> to the Planning Secretary for information.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> <li>GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024</li> <li>GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility, Rev02 April 2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2 (on exhibition)</li> </ul>	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, was finalised in May 2024 & submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). The Stage 2 PUDCLP was on public exhibition at the time of IA2. In accordance with Condition E75, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information. A record of advice and recommendations register was available for review in Appendix C of the Stage 1 PUDCLP to satisfy Condition E75.
E76	The Proponent must provide the design development schedule to the <b>DRP</b> prior to its first meeting, including details of when relevant elements of the detailed design will be available for review by the Panel. The schedule must be updated every three months until the detailed design process is complete.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> <li>DRP 36 DRP Meeting Agenda - 01 February, 2024-Rev 3</li> <li>Evidence RE: Design Development Schedule, as provided by the Sydney Metro Manager Precinct and Place Making and Precinct Activation, Property and Place, dated 20/8/2024</li> </ul>	C	A package of slides was presented to the DRP on 1/2/2024 (DRP #36) providing the DRP with a future Design Development Schedule as required under Condition E76. A copy of the agenda was also provided for review.  <b>NB: The requirement for the Design Development Schedule to be provided to the DRP prior to its first meeting was not verified during this audit (outside the audit period and scope), but should be verified by the Proponent to ensure compliance with Condition E76.</b>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Place, Urban Design and Corridor Landscape Plan</b>				
E77	<p>A PUDCLP must be prepared to document and illustrate the permanent built works and landscape design of the CSSI and how these works are to be maintained. The PUDCLP must be:</p> <p>(a) prepared by a suitably qualified and experienced person(s) in consultation with the community (including the affected landowners and businesses or a representative of the businesses), Western Parklands City Authority, Western Sydney Planning Partnership and relevant council(s);</p> <p>(b) reviewed by an independent and suitably qualified and experienced person nominated by the DRP;</p> <p>(c) submitted to the Planning Secretary prior to the construction of permanent built surface works and/or landscaping, excluding those elements which for ecological requirements, or technical requirements, or requirements as agreed by the Planning Secretary do not allow for alternate design outcomes; and</p> <p>(d) implemented during construction and operation of the CSSI.</p> <p><i>Note: The PUDCLP may be developed and considered in stages to facilitate design progression and construction. Any such staging and associated approval would need to facilitate a cohesive final design and not limit final design outcomes.</i></p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 4/3/2023</li> <li>GANSW Letter of Advice, Sydney Metro WSA, DRP 24, 21/8/2023</li> <li>GANSW Letter of Advice, Sydney Metro WSA, DRP 43, 24/6/2024</li> <li>GANSW Letter of Advice, Sydney Metro WSA, DRP 44, 13/8/2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility, Rev02 April 2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2 (on exhibition)</li> </ul>	C	<p>The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility, was finalised in May 2024 &amp; submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). The Stage 2 PUDCLP was on public exhibition at the time of IA2.</p> <p>In accordance with Condition E75, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information.</p> <p>Section 01.6 of the Stage 1 PUDCLP addressed compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the audit.</p> <p>b) GANSW Principal Design Advisor Melizza Morales was appointed and reviewed the PUDCLP, as documented in GANSW Letter of Advice, Sydney Metro WSA, DRP 24, 21/8/2023.</p>
<b>Place, Urban Design and Corridor Landscape Plan - Documentation</b>				
E78	<p>The PUDCLP must document how the following matters have been considered in the design and landscaping of the project:</p> <p>(a) the requirements of <b>Conditions E63 to E65</b>, and</p> <p>(b) advice and recommendations from the <b>DRP</b>.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility, Rev02 April 2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2 (on exhibition)</li> </ul>	C	<p>The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility, was finalised in May 2024 &amp; submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). The Stage 2 PUDCLP was on public exhibition at the time of IA2.</p> <p>In accordance with Condition E75, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information.</p> <p>Section 01.6 of the Stage 1 PUDCLP addressed compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the audit.</p> <p>A summary of the dates of the DRP meetings and the issues raised by the DRP at these meetings is contained in Section 01 and Appendix C of the PUDCLP Stage 1.</p>
E79	<p>The PUDCLP must include descriptions and visualisations (as appropriate) of:</p> <p>(a) design of the permanent built elements of the CSSI, including stabling and maintenance and ancillary facilities, service facilities and tunnel portals;</p> <p>(b) plans for station precincts including but not limited to:</p> <ol style="list-style-type: none"> <li>justification of the spatial scope of each station precinct plan;</li> <li>provision for public art and heritage interpretation installations;</li> <li>placemaking opportunities, having regard to placemaking initiatives in Western Sydney Aerotropolis planning documents;</li> <li>interchange access plans developed in consultation with the <b>Traffic and Transport Liaison Group</b>;</li> <li>active transport connections and end of trip facilities, design of pedestrian and cycle access, facilities and fixtures;</li> <li>design of commuter car parking elements, where relevant;</li> </ol> <p>(c) landscaping and building design opportunities to mitigate visual impacts and minimise light spill on the nearby residences;</p> <p>(d) the design of watercourse crossings and east-west corridor movements to give to effect of Condition E14;</p> <p>(e) landscaping:</p> <ol style="list-style-type: none"> <li>landscape plan, hard and soft elements, for the corridor and the station precincts;</li> <li>use of native species from the relevant native vegetation community (or communities), where identified as appropriate;</li> <li>water sensitive urban design initiatives</li> <li>management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design;</li> <li>measures to prevent wildlife strike risk in proximity to Western Sydney International Airport;</li> </ol> <p>(f) details of strategies to rehabilitate, regenerate or revegetate disturbed areas, where relevant;</p> <p>(g) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design;</p> <p>(h) operational maintenance standards; and</p> <p>(i) the timing and responsibilities for implementation of elements included within the PUDCLP.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility, Rev02 April 2024</li> <li>Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2 (on exhibition)</li> </ul>	C	<p>The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building &amp; Stabling and Maintenance Facility, was finalised in May 2024 &amp; submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). The Stage 2 PUDCLP was on public exhibition at the time of IA2.</p> <p>In accordance with Condition E75, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information.</p> <p>Section 01.6 of the Stage 1 PUDCLP addressed compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the audit.</p> <p>A summary of the dates of the DRP meetings and the issues raised by the DRP at these meetings is contained in Section 01 and Appendix C of the PUDCLP Stage 1.</p>

Item
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<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Operational Maintenance</b>				
E80	The ongoing maintenance and operation costs of urban design, open space, landscaping and recreational items and work implemented as part of this approval remain the Proponent's responsibility until satisfactory arrangements have been put in place for the transfer of the asset to the relevant authority. Before the transfer of assets, the Proponent must maintain items and work to at least the design standards established in the PUDCLP, required by <b>Condition E79</b> .  The Planning Secretary must be advised prior to the transfer of the asset(s) to the relevant authority.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2024	NT	Not triggered during the audit period.
E81	Should any plant loss occur during the maintenance period the plants must be replaced by the same plant species unless it is determined by a suitably qualified person that a different species is more suitable for that location.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2024	NT	Not triggered during the audit period.
<b>SOCIO-ECONOMIC, LAND USE AND PROPERTY</b>				
E82	The CSSI must be designed and constructed with the objective of minimising impacts to, and interference with third party property, and that such infrastructure and property is protected during construction.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2024	NT	Auditees advised there has been no excavation to date for SSTOM that may pose a settlement risk or interference with third party property. Future SSTOM works in the vicinity of the St Marys Goods Shed will involve preparation of an Environmental Control Map (ECM) to identify relevant environmental aspects, including potential vibration and settlement impacts to the heritage-listed building. It is understood Condition E102 relates predominantly to the SBT portion of the project for the tunnelling works. While groundwater has been encountered in the station boxes, SSTOM's responsibility for groundwater monitoring and settlement monitoring had not been triggered at the time of IA2. The Groundwater Monitoring Program is understood to be under review prior to handover of the management of these risks to SSTOM.
E83	The utilities and services (hereafter "services") potentially affected by construction must be identified to determine requirements for diversion, protection and / or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. Disruption to services resulting from construction must be avoided, wherever possible, and advised to customers where it is not possible.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2024 • Environmental Review ER 002 - Kent Road Watermain, approved 27/3/2024 • Environmental Review ER 003 - Lansdowne and Samuel Marsden Roads (Orchard Hills) Sewer Main, approved 29/4/2024 • WSA SSTOM, Stabling and Maintenance Facility, Site Works and Power Installation DNVIS, Rev01, 30/5/2024 • SSTOM Precinct Utility Package Design Report, Stage 2, RevA, dated 3/10/2023	NT	Works with the potential to impact services had not been undertaken during the audit period. Utilities works are planned in streets surrounding the Orchard Hills site in the near future, with associated planning approval pathways captured in Environmental Reviews. The design report for services was made available for review during the audit and documents the framework for the identification and management of utility authority assets. Section 3.3 of the design report confirms the design is required to comply with obligations of Third-Party Agreements as stipulated in the Deed so that Sydney Metro is not in breach of complying with these agreements.
<b>Condition Survey</b>				
E84	A suitably qualified and experienced person must undertake condition surveys of all buildings, structures, utilities and the like identified in the documents listed in <b>Condition A1</b> and the further assessment carried out under mitigation measure GW1 of the Submissions Report as being at risk of damage before commencement of any work that could impact on the subject surface / subsurface structure. The results of the surveys must be documented in a Pre-construction <b>Condition Survey Report</b> for each item surveyed. Copies of <b>Pre-construction Condition Survey Reports</b> must be provided to the relevant owners of the items surveyed in the vicinity of the proposed work, and no later than one (1) month before the commencement of the work that could impact on the subject surface / subsurface structure.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2024 • Land Surveys Existing Condition Survey Report, Tram Sheds, St Marys 2760, Rev0, inspection date 30/5/2023	C	Auditees advised a number of pre-condition surveys were conducted under previous packages (SBT and SCAW). The Goods Shed at St Marys has been identified as being at risk of damage by future SSTOM works. It is understood that a pre-condition survey for the Goods Shed was conducted by SBT prior to works within the vicinity of the building. SSTOM provided a copy of a pre-condition survey for the Goods Shed (also understood to be known as the Tram Sheds), the inspection for which was conducted by Land Surveys on 30/5/2023, prior to SSTOM utilising the area of land near the Goods Shed previously. Auditees confirmed that no other buildings, structures, or utilities listed in <b>Condition A1</b> are at risk of being damaged by SSTOM works. All other high risk sites have been assessed by previous contractors as part of their scope of works, with SSTOM's works primarily consisting around building stations in pre-disturbed areas / scopes (or in greenfield areas with no structures present) or fit out on existing infrastructure that has installed by other (tunnels, viaducts etc).
E85	Condition surveys of all items for which condition surveys were undertaken in accordance with <b>Condition E84</b> must be undertaken by a suitably qualified and experienced person after completion of the work identified in <b>Condition E84</b> . The results of the surveys must be documented in a <b>Post-construction Condition Survey Report</b> for each item surveyed. Copies of <b>Post-construction Condition Survey Reports</b> must be provided to the landowners of the items surveyed, and no later than three (3) months following the completion of the work that could impact on the subject surface / subsurface structure.	• Interview with Sydney Metro & ParkLife Metro, 15/08/2024 • Letter from Sydney Metro to DPHI RE: SMWSA SSI 10051 Condition E8 – Notification of appointment of Independent Property Assessment Panel, dated 28/6/2023 • Post Approval Form_20230628074714 DPE IPIAP, Compliance Report, Annual Review, Audit Report, SSI-10051-PA-258, dated 28/6/2023 • SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023	NT	Not triggered within the audit period.
E86	The Proponent, where liable, must rectify any property damage caused directly or indirectly (for example from vibration or from groundwater change) by the work at no cost to the owner. Alternatively, the Proponent may pay compensation for the property damage as agreed with the property owner. Rectification or compensation must be undertaken within 12 months of completion of the work identified in <b>Condition E84</b> unless another timeframe is agreed with the owner of the affected surface or subsurface structure or recommended by the <b>Independent Property Impact Assessment Panel (IPIAP)</b> .	• Interview with Sydney Metro & ParkLife Metro, 15/08/2024 • Land Surveys Existing Condition Survey Report, Tram Sheds, St Marys 2760, Rev0, inspection date 30/5/2023	NT	There is no property damage known to have occurred as part of SSTOM.

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<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2 WSA SSTOM August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E87	Appropriate equipment to monitor areas in proximity of ancillary facilities and the tunnel route must be installed during construction with particular reference to at risk buildings, structures and utilities identified in the condition surveys required by <b>Condition E84</b> and / or geotechnical analysis as required. If monitoring during construction indicates exceedance of the vibration criteria identified in the <b>DNVIS</b> prepared under <b>Condition E47</b> , or levels otherwise determined as appropriate by a suitably qualified structural engineer, then all construction affecting settlement must cease immediately and must not resume until fully rectified or a revised method of construction is established that will ensure protection of affected buildings.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	<p>Not triggered within the audit period. There has been no damage determined to occur as a result of the project. Auditees advised no vibratory activities requiring vibration monitoring have been conducted during the audit period.</p> <p>It is understood that the existing vibration monitor attached to the St Marys Goods Shed and settlement monitoring requirements will be handed over to SSTOM by SBT in the near future. To be re-assessed during the 3rd IEA.</p>
E88	An <b>IPIAP</b> must be established prior to tunnelling activities commencing. The Planning Secretary must be informed of the members of the <b>IPIAP</b> and must comprise geotechnical and engineering experts independent of the design and construction team. The <b>IPIAP</b> will be responsible for independently verifying condition surveys undertaken under <b>Conditions E84</b> and <b>E85</b> , the resolution of property damage disputes and the establishment of ongoing settlement monitoring requirements.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Letter from Sydney Metro to DPHI RE: SMWSA SSI 10051 Condition E8 – Notification of appointment of Independent Property Assessment Panel, dated 28/6/2023</li> <li>Post Approval Form 2023/0623074714 DPE IPIAP, Compliance Report, Annual Review, Audit Report, SSI-10051-PA-258, dated 28/6/2023</li> <li>SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023</li> </ul>	C	<p>An Independent Property Impact Assessment Panel (IPIAP) has been established as set out in a letter from Sydney Metro to DPHI RE: SMWSA SSI 10051 Condition E8 – Notification of appointment of Independent Property Assessment Panel, dated 28/6/2023. The IPIAP relates to the entire Sydney Metro – Western Sydney Airport project.</p> <p>The below people will together, act in the capacity of the IPIAP that will be responsible for independently verifying property condition surveys undertaken under <b>Conditions E84</b> and <b>E85</b>, the resolution of property damage disputes and the establishment of ongoing settlement monitoring requirements. The letter cited states the members are geotechnical and engineering experts that have a proven track record acting in the capacity of IPIAP members for other State Significant Infrastructure projects, they are:</p> <ul style="list-style-type: none"> <li>Dr James Barbato, Associate Director of Mine Subsistence Engineering Consultants</li> <li>Mr Daryl Kay, Director of Mine Subsistence Engineering Consultants</li> <li>Mr Paul Roberts, Principal Associate of JK Geotechnics</li> </ul> <p>DPHI responded to the IPIAP nominations in an Appointment of Experts Letter, dated 30/6/2023.</p> <p>There have been no investigations or claims of property damage from the project under the IPIAP to date for SSTOM.</p>
E89	Either the affected property owner or the Proponent may refer unresolved disputes arising from potential and/or actual property impacts to the <b>IPIAP</b> for resolution. All costs incurred in the establishing and implementing of the panel must be borne by the Proponent regardless of which party makes a referral to the <b>IPIAP</b> . The findings and recommendations of the <b>IPIAP</b> are final and binding on the Proponent.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023</li> </ul>	NT	There have been no SSTOM-related unresolved disputes within the audit period.
E90	Settlement must be monitored for any period beyond the minimum timeframe requirements of <b>Condition E87</b> if directed so by the <b>IPIAP</b> following its review of the monitoring data from the period not less than six (6) months after settlement has stabilised, consistent with <b>Condition E87</b> . The results of the monitoring must be made available to the Planning Secretary upon request.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023</li> </ul>	NT	SSTOM has not been directed to conduct settlement monitoring by the IPIAP during the audit period.
<b>Small Business Owners Engagement Plan(s)</b>				
E91	<b>Small Business Owners Engagement Plan(s)</b> must be prepared for St Marys and implemented in accordance with the <b>Overarching Community Communication Strategy</b> to minimise impact on small businesses directly affected by construction activities at St Marys during construction. The plan must be prepared and submitted to the Planning Secretary for information before the commencement of construction at St Marys.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection 14/8/2024</li> <li>PLM Small Business Owners Engagement Plan, St Marys, Rev.0, dated 10/11/2023</li> <li>ParkLife Project website: <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a></li> </ul>	C	The Small Business Owners Engagement Plan, St Marys was provided for review and available on the PLM project website in the community section. Sydney Metro advised that the Small Business Owners Engagement Plan was originally prepared by CPBC prior to Project Construction commencement to satisfy this Condition, thus the requirement to submit to the Planning Secretary applies to the SBT contract, not SSTOM.
<b>SOILS AND CONTAMINATION</b>				
<b>Contaminated sites</b>				
E92	Before commencement of any construction that would result in the disturbance of moderate to high risk contaminated sites as identified in the documents identified in <b>Condition A1, Detailed Site Investigations</b> (for contamination) must be conducted to determine the full nature and extent of the contamination. The <b>Detailed Site Investigation Report(s)</b> and the subsequent report(s), must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The Detailed Site Investigations must be undertaken in accordance with guidelines made or approved under section 105 of <i>Contaminated Land Management Act 1997</i> (NSW).  <i>Note: Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports (for contamination) for separate sites.</i>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>ParkLife Project website: <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a></li> <li>Sydney Metro Project website: <a href="https://www.sydneymetro.info/documents">https://www.sydneymetro.info/documents</a></li> <li>FIW Contamination Register to PLM_201223</li> </ul>	NT	<p>Detailed Site Investigation (DSI) reports for the WSA project were undertaken prior to commencement of the SSTOM package of works and prior to tunnelling and bulk excavation under previous contractors, SBT and SCAW. A list of DSIs conducted by previous contractors is recorded in a Contamination Register. The review of DSIs has not been verified as part of the SSTOM works package.</p> <p>No moderate-high-risk contaminated sites are known to have been identified for the SSTOM package of works.</p> <p>A contaminated groundwater plume is known to exist at the St Marys site from a former Dry Cleaners property. Potential impacts of the plume on the project are being managed by SBT by implementation of the Groundwater Monitoring Program, which is due to be handed over to SSTOM in the near future.</p>
E93	Should remediation be required to make land suitable for the final intended land use, a <b>Remedial Action Plan</b> must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The <b>Remedial Action Plan</b> must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997 (NSW) and must include measures to remediate the contamination at the site to ensure the site will be suitable for the proposed use when the <b>Remedial Action Plan</b> is implemented.  <i>Note: Nothing in this condition prevents the Proponent from preparing individual Remedial Action Plans for separate sites.</i>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>ParkLife Project website: <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a></li> <li>Sydney Metro Project website: <a href="https://www.sydneymetro.info/documents">https://www.sydneymetro.info/documents</a></li> </ul>	NT	There is no known requirement for remediation or the preparation of a Remedial Action Plan (RAP) for the SSTOM project to date.
E94	Before commencing remediation, a <b>Section B Site Audit Statement(s)</b> must be prepared by an NSW EPA-accredited Site Auditor that certifies that the <b>Remedial Action Plan(s)</b> is/are appropriate and that the site can be made suitable for the proposed use. The <b>Remedial Action Plan(s)</b> must be implemented and any changes to the <b>Remedial Action Plan(s)</b> must be approved in writing by the NSW EPA-accredited Site Auditor.  <i>Note: Nothing in this condition prevents the Proponent from engaging an NSW EPA-accredited Site Auditor to prepare individual Site Audit Statements for Remedial Action Plans for separate sites.</i>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>ParkLife Project website: <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a></li> <li>Sydney Metro Project website: <a href="https://www.sydneymetro.info/documents">https://www.sydneymetro.info/documents</a></li> </ul>	NT	There is no known requirement for remediation or the preparation of a Remedial Action Plan (RAP) for the SSTOM project to date.

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E95	<b>Validation Report(s)</b> must be prepared in accordance with <i>Consultants Reporting on Contaminated Land: Contaminated Land Guidelines</i> (EPA, 2020) and relevant guidelines made or approved under section 105 of the <i>Contaminated Land Management Act 1997</i> (NSW).  <i>Note: Nothing in this condition prevents the Proponent from preparing individual Validation Reports for separate sites.</i>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>ParkLife Project website: <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a></li> <li>Sydney Metro Project website: <a href="https://www.sydneymetro.info/documents">https://www.sydneymetro.info/documents</a></li> </ul>	NT	There is no known requirement for remediation or the preparation of a Remediation Action Plan (RAP) for the SSTOM project to date.
E96	<b>A Section A1 or Section A2 Site Audit Statement</b> (accompanied by an <b>Environmental Management Plan</b> ) and its accompanying <b>Site Audit Report</b> , which state that the contaminated land disturbed by the work has been made suitable for the intended land use, must be submitted to the Planning Secretary and the Relevant Council(s) after remediation and before the commencement of operation of the CSSI.  <i>Note: Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.</i>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>ParkLife Project website: <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a></li> <li>Sydney Metro Project website: <a href="https://www.sydneymetro.info/documents">https://www.sydneymetro.info/documents</a></li> </ul>	NT	There is no known requirement for remediation or the preparation of a Remediation Action Plan (RAP) for the SSTOM project to date. There is no known requirement for the preparation of a Site Audit Report (SAR) or Site Audit Statement (SAS) for the SSTOM project to date.
E97	<b>A copy of Detailed Site Investigation Report(s), Remedial Action Plan(s), Validation Report(s), Site Audit Report(s) and Site Audit Statement(s)</b> must be submitted to the Planning Secretary and the Relevant Council(s) for information.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>ParkLife Project website: <a href="https://parklifemetro.com.au/project/">https://parklifemetro.com.au/project/</a></li> <li>Sydney Metro Project website: <a href="https://www.sydneymetro.info/documents">https://www.sydneymetro.info/documents</a></li> <li>FIW Contamination Register to PLM_201223</li> </ul>	NT	DSI reports for the WSA project were undertaken prior to commencement of the SSTOM package of works and prior to tunnelling and bulk excavation under previous contractors, SBT and SCAW. A list of DSIs conducted by previous contractors is recorded in a Contamination Register. The review of DSIs has not been verified as part of the SSTOM works package. No moderate-high-risk contaminated sites are known to have been identified for the SSTOM package of works.  A contaminated groundwater plume is known to exist at the St Marys site from a former Dry Cleaners property. Potential impacts of the plume on the project are being managed by SBT by implementation of the Groundwater Monitoring Program, which is due to be handed over to SSTOM in the near future.
E98	An <b>Unexpected Contaminated Land and Asbestos Finds Procedure</b> 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"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SSTOM SWMP, Rev 01, 17/7/2023</li> <li>Contamination and Asbestos Unexpected Finds Procedure, Rev D, dated 9/6/2023</li> </ul>	C	Appendix C of the SSTOM Soil and Water Management Plan (SWMP) sets out the Unexpected Finds Procedures (UFP) for contamination. The SWMP was submitted to DPHI on 29/11/2021, prior to the commencement of work. There were no unexpected finds of contamination encountered during the audit period.
E99	The <b>Unexpected Contaminated Land and Asbestos Finds Procedure</b> must be implemented throughout construction.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SSTOM SWMP, Rev 01, 17/7/2023</li> <li>Contamination and Asbestos Unexpected Finds Procedure, Rev D, dated 9/6/2023</li> </ul>	NT	There were no unexpected finds of contamination encountered during the audit period.



<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>SUSTAINABILITY</b>				
E100	A <b>Sustainability Plan</b> must be prepared to achieve an Infrastructure Sustainability Council of Australia (ISCA) Infrastructure Sustainability rating of +75 (Version 1.2) (or equivalent level of performance using a demonstrated equivalent rating tool) or a 5-Star Green Star rating (or equivalent level of performance using a demonstrated equivalent rating tool).	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro WSA Sustainability Plan, January 2022</li> <li>Sydney Metro Letter of submission to DPHI Ref SM-2200002922, dated 21/1/2022</li> <li>RE: CSSI 10051 – Condition of Approval E100 &amp; 101 - Submission of Sydney Metro - Western Sydney Airport (SM-WSA) Sustainability Management Plan</li> </ul>	C	Sydney Metro WSA Sustainability Plan, January 2022 sighted and on the project website. Auditees confirmed the ISCA Rating tool is being followed during Construction, as required by the SMP, and the letter of submission of the Sustainability Plan states the plan has been prepared to achieve IS rating of 75+ as required by Condition E100.
E101	The <b>Sustainability Plan</b> must be submitted to the Planning Secretary for information within six (6) months of the date of this approval and must be implemented throughout construction and operation.  <i>Note: Nothing in this condition prevents the Proponent from preparing separate Sustainability Strategies for the construction and operational stages of the CSSI.</i>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Sydney Metro WSA Sustainability Plan, January 2022</li> <li>Sydney Metro Letter of submission to DPHI Ref SM-2200002922, dated 21/1/2022</li> <li>RE: CSSI 10051 – Condition of Approval E100 &amp; 101 - Submission of Sydney Metro - Western Sydney Airport (SM-WSA) Sustainability Management Plan</li> </ul>	C	The Sydney Metro WSA Sustainability Plan, January 2022 (SMP) was submitted to DPHI on 21/1/2022, within six months of the date of SSI-10051 approval on 23/7/2021.
E102	A <b>Water Reuse Strategy</b> must be prepared, which sets out options for the reuse of collected stormwater and groundwater during construction and operation. The <b>Water Reuse Strategy</b> must include, but not be limited to:  (a) evaluation of reuse options; (b) details of the preferred reuse option(s), including volumes of water to be reused, proposed reuse locations and/or activities, proposed treatment (if required), and any additional licences or approvals that may be required; (c) measures to avoid misuse of recycled water as potable water; (d) consideration of the public health risks from water recycling; and (e) time frame for the implementation of the preferred reuse option(s).  The <b>Water Reuse Strategy</b> must be prepared based on best practice and advice sought from relevant agencies, as required. The Strategy must be applied during construction.  Justification must be provided to the Planning Secretary if it is concluded that no reuse options prevail.  A copy of the <b>Water Reuse Strategy</b> must be made publicly available.  <i>Note: Nothing in this condition prevents the Proponent from preparing separate Water Reuse Strategies for the construction and operational stages of the CSSI.</i>	<ul style="list-style-type: none"> <li>PLM Sydney Metro WSA SSTOM Water Reuse Strategy Rev01, dated 15/5/2024</li> <li>https://parklifemetro.com.au/wp-content/uploads/2024/05/SMWSASSM-PLD-INL-SB-PLN-000001-Sydney-Metro-WSA-SSTOM-Water-Reuse-Strategy-Rev-01.pdf</li> </ul>	C	The E102 SSTOM Water Reuse Strategy has been prepared and was available on the PLM project website. The Water Reuse Strategy includes the following: <ul style="list-style-type: none"> <li>Water Balance Study</li> <li>Train wash water Reuse</li> <li>Rainwater tanks at stations and SMF</li> <li>Use of recycled water mains water when available to site</li> <li>Water efficiency strategies</li> <li>Engagement with Sydney Water was undertaken as part of site establishment process to determine availability of non-potable water mains.</li> </ul> Further engagement as part of development of the Water Reuse Strategy was not deemed necessary as available information was sufficient. No other relevant agencies were identified.  The contents of the Water Reuse Strategy (a)-(e) have not been re-evaluated here as the strategy was prepared prior to the IA2 audit period. E102 was verified as compliant during IA1.
<b>TRAFFIC AND TRANSPORT</b>				
E103	Construction Traffic Management Plans ( <b>CTMPs</b> ) must be prepared in accordance with the Construction Traffic Management Framework. A copy of the <b>CTMPs</b> must be submitted to the Planning Secretary for information before the commencement of any construction in the area identified and managed within the relevant <b>CTMP</b> .	<ul style="list-style-type: none"> <li>Site inspection 14/8/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>PLM Overarching CTMP_Rev0, dated 28/6/2023</li> <li>CTMP St Marys Station, Rev01, dated 3/4/2024</li> <li>CTMP St Marys Station, DPHI Submission, dated 19/4/2024</li> <li>CTMP Orchard Hills Station, Rev02, dated 11/6/2024</li> <li>CTMP Orchard Hills Station, DPHI Submission, dated 6/8/2024</li> <li>CTMP Linewide RevB</li> <li>CTMP Linewide, DPHI Submission, dated 5/8/2024</li> </ul>	C	Construction Traffic Management Plans (CTMPs) were prepared for the following locations during the audit period: - St Marys - Orchard Hills - Linewide  CTMPs for the above sites were originally submitted to DPHI prior to construction commencing in each area (refer evidence column for dates).  <b>NB: It is noted that the CTMP Orchard Hills Station, Rev02, dated 11/6/2024 was not submitted to DPHI until 6/8/2024. The timing of commencement of work the subject of the CTMP Rev02 was unable to be verified.</b>  <b>Refer to Condition B11 for Observation re CTMPs on the Project website.</b>  The Linewide CTMP was not yet available on the PLM website at the time of the audit (Linewide works had not commenced).
<b>Management of Heavy Vehicle Movements</b>				
E104	The locations of all Heavy Vehicles used for spoil haulage must be monitored in real time and the records of monitoring be made available electronically to the Planning Secretary and the EPA upon request for a period of no less than one (1) year following the completion of construction.	<ul style="list-style-type: none"> <li>Site inspection 14/8/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	There was no spoil haulage conducted for SSTOM during the audit period.
E105	Local roads proposed to be used by Heavy Vehicles to directly access ancillary facilities / construction sites that are not identified in the documents listed in <b>Condition A1</b> must be approved by the Planning Secretary and be included in the <b>CTMP</b> .	<ul style="list-style-type: none"> <li>Site inspection 14/8/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	All spoil haulage routes have been approved as documented in CTMPs. Auditees advised there has been no requirement to undertake a Heavy Vehicle Local Road (HVLRA) Assessment to date. Future HVLRA Assessments are expected to be required for the Orchard Hills site.  There were no heavy vehicles observed on local roads during the site inspection.
E106	All requests to the Planning Secretary for approval to use local roads under Condition E105 above must include the following:  (a) a swept path analysis; (b) demonstration that the use of local roads by Heavy Vehicles for the CSSI will not compromise the safety of pedestrians and cyclists of the safety of two-way traffic flow on two-way roadways; (c) details as to the date of completion of the road dilapidation surveys for the subject local roads; and (d) measures that will be implemented to avoid where practicable the use of local roads past schools, aged care facilities and child care facilities during their peak operation times; and (e) written advice from an appropriately qualified professional on the suitability of the proposed Heavy Vehicle route which takes into consideration items (a) to (d) of this condition.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	All spoil haulage routes have been approved as documented in CTMPs. Auditees advised there has been no requirement to undertake a Heavy Vehicle Local Road Assessment (HVLRA) to date. Future HVLRA are expected to be required for the Orchard Hills site.

Item
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED] Morayse Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

Result	Comment
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Road Dilapidation</b>				
E107	Before any local road is used by a Heavy Vehicle for the purposes of construction of the CSSI, a <b>Road Dilapidation Report</b> must be prepared for the road. A copy of the <b>Road Dilapidation Report</b> must be provided to the Relevant Road Authority(s) within three (3) weeks of completion of the survey and at no later than one (1) month before the road being used by Heavy Vehicles associated with the construction of the CSSI.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Land Surveys Existing Condition Survey Report, Road Corridor - Patons Lane, Rev0, dated 1/6/2023</li> <li>Land Surveys Existing Condition Survey Report, Road Corridor - Reserve Road, Rev0, dated 1/6/2023</li> <li>Email from PLM Survey Manager to Penrith City Council RE: Road Dilapidation Surveys, dated 13/7/2023</li> </ul>	C	Two Road Pre-Condition Dilapidation Surveys were sighted - Reserve Road (1/6/2023) and Patons Lane (1/6/2023). Verification of submission of these road dilapidation reports to the Relevant Road Authority, and date of first use of the road by heavy vehicles was outside the audit period so was not verified. An email from PLM, dated 13/7/2023 lists road dilapidation reports were also prepared for: Gipps Street, Luddenham Road North, Luddenham Road South, Patons Lane, Reserve Road, Putland Street (though timing for these was outside the scope of this IA2).
E108	If damage to roads occurs as a result of the construction of the CSSI, the Proponent must either (at the Relevant Road Authority's discretion): (a) compensate the Relevant Road Authority for the damage so caused; or (b) rectify the damage to restore the road to at least the condition it was in pre-work as identified in the <b>Road Dilapidation Report</b> .	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Interview with ER, 19/8/2024</li> <li>Site inspection, 14/08/2024</li> <li>ROL Licence No. 2308744, Construction of driveway to access Sydney Metro Western Sydney Airport Line Orchard Hills Station site light vehicle car park, Lansdowne Road Orchard Hills, 24/7/24-31/7/24</li> <li>ROL Licence No. 2314812, Luddenham Road is used as a main transport corridor for Linewide site access gate LWD 6 construction - occasional stop / slow is required to allow construction HV access, Luddenham Road Luddenham, 3/8/24-4/9/24</li> </ul>	NT	Damage to Kent Road, Orchard Hills has occurred during the project, and can be attributed to heavy vehicle use by the SSTOM project, and other nearby projects, including SM-WSA projects using the same road. Auditees advised road damage attributed to SSTOM has been fixed and there were no significant potholes identified during the audit period, or during the audit site inspection. Road Occupancy Licences (ROLs) obtained for the rectification of damage were reviewed during the audit. It is understood that SSTOM has come to an agreement with Penrith City Council whereby future rectification of road damage will be able to be conducted without an ROL, and thereby expediting the process by improved efficiencies. It is understood that the rectification of road damage has improved since SSTOM commenced works in the area, as confirmed by Sydney Metro and the ER.
<b>Construction Parking and Access Management</b>				
E109	Vehicles associated with the project workforce (including light vehicles and Heavy Vehicles) must be managed to: (a) minimise parking on public roads; (b) minimise idling and queuing on state and regional roads; (c) not carry out marshalling of construction vehicles near sensitive land use(s); (d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and (e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the <b>CTMP</b> .	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Interview with ER, 19/8/2024</li> <li>Interview with Sydney Metro Communications Manager, 16/8/2024</li> <li>Site inspection, 14/08/2024</li> <li>PLM Overarching CTMP, Rev0, dated 28/6/2023</li> <li>CTMP Orchard Hills Station, Rev02, dated 1/6/2024</li> <li>Construction Worker Car Parking Strategy, St Marys Station Rev0, dated 1/12/2023</li> <li>CTMP St Marys Station, Rev01, dated 3/4/2024</li> <li>CTMP, Appendix E Drivers Code of Conduct</li> </ul>	C	Section 5.2 of the Overarching CTMP states: "There will be a shortfall in the amount of on-site parking provision at St Marys. The site-specific Parking Management Plan for St Marys will seek to minimise the impact of the overall demand for construction worker parking through initiatives such as: <ul style="list-style-type: none"> <li>Investigation of remote parking facility options in conjunction with the provision of shuttle buses</li> <li>Promotion of carpooling</li> <li>Encouraging the use of public transport</li> </ul> Parklife Metro will endeavour to ensure the impact of the contractor parking demand within the St Marys area will not adversely affect the St Marys CBD and residential amenities (existing car parking spaces)".  The worker car parking strategy includes stakeholder consultation and responsibilities (ParkLife Metro, Penrith City Council and TNSW). Section 5 of the Strategy includes travel arrangements for workers and plans for communication, satellite parking arrangements and a travel mode needs survey. Section 4.5.2 of the CTMP details the truck routes and has truck swept paths in Appendix A to manage disruption of public access. Section 5 of the CTMP sets out requirements for traffic impact management.  St Marys Station was inspected during the audit. Initiatives to reduce worker parking on public streets were observed. (a) Signage including a map indicating restricted parking zones for worker vehicles was displayed on the St Marys construction site hoarding. (b) CTMP Appendix E Drivers Code of Conduct includes commitment "Do not queue on public roads unless a prior approval has been sought", reference to idling is included in Section 4.2 of the Overarching CTMP. (c) Marshalling is undertaken on Patons Lane, there are no nearby sensitive receivers. There is a limit on the number of trucks allowed to queue on Patons Lane, and for the SMF, and allowance for truck marshalling inside these sites has been implemented to reduce queuing on public roads. (d) No restriction of access is known to have occurred. There were no project vehicles observed idling or parked in the vicinity of St Marys Station during the audit site inspection. (e) Condition E109 is addressed in the Overarching CTMP, including a commitment to ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP.
<b>Property Access</b>				
E110	Access to all utilities and properties must be maintained during works, unless otherwise agreed with the relevant utility owner, landowner or occupier.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection, 14/08/2024</li> </ul>	C	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.
E111	The Proponent must maintain access to properties during the entirety of works unless an alternative access is agreed in writing with the landowner(s) whose access is impacted by the CSSI works.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection, 14/08/2024</li> </ul>	C	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.
E112	Where construction of the CSSI restricts a property's access to a public road, the Proponent must, until their primary access is reinstated, provide the property with temporary alternate access to an agreed road decided through consultation with the landowner, at no cost to the property landowner, unless otherwise agreed with the landowner.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection, 14/08/2024</li> </ul>	NT	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.
E113	Any property access physically affected by the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner or occupier. Property access must be reinstated within one (1) month of the work that physically affected the access is completed or in any other timeframe agreed with the landowner or occupier.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection, 14/08/2024</li> </ul>	NT	There was no restricted access observed during the site inspection and no issues with utility or property access had been reported during the audit period.
E114	During construction, all reasonably practicable measures must be implemented to maintain pedestrian, cyclist and vehicular access to, and parking in the vicinity of, businesses and affected properties. Disruptions are to be avoided, and where avoidance is not possible, minimised. Where disruption cannot be avoided, alternative pedestrian, cyclist and vehicular access, and parking arrangements must be developed in consultation with affected businesses and landowners and implemented before the disruption. Adequate signage and directions to businesses must be provided before, and for the duration of, any disruption.	<ul style="list-style-type: none"> <li>Site inspection, 14/08/2024</li> <li>Interview with Communications Manager, 16/8/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>PLM Small Business Owners Engagement Plan, St Marys, Rev0, dated 10/11/2023</li> <li>Community Consultation Strategy (CCS)</li> <li>Construction Worker Car Parking Strategy - St Marys Station - Rev 0, dated 1/12/2023</li> <li>PLM Overarching CTMP, Rev0, dated 28/6/2023</li> </ul>	C	Pedestrian, cyclist and vehicular access management are detailed in the sighted documents. Adequate signage has been implemented as per site observations and audit discussions. There have not been any complaints recorded on this matter.

<b>Item</b>
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<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>Pedestrian and Cyclist Access</b>				
E115	Safe pedestrian and cyclist access must be maintained around the St Marys construction site during construction. In circumstances where pedestrian and cyclist access is restricted or removed due to construction activities, a proximate alternate route which complies with the relevant standards, must be provided and signposted before the restriction or removal of the impacted access.	<ul style="list-style-type: none"> <li>Site inspection, 14/08/2024</li> <li>Interview with Communications Manager, 16/8/2024</li> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Community Consultation Strategy (CCS)</li> <li>CTMP St Marys Station, Rev01, dated 3/4/2024</li> </ul>	C	<p>As per the PLM Overarching CTMP Section 4.2, PLM has committed to providing alternate cyclist and pedestrian routes, where these may conflict with construction access/ egress. Any alternate route is to comply with the relevant standards. The CTMP commits to the installation of site safety from site establishment which includes the provision of site specific inductions/mandatory training for personnel around expectation for site operations and interactions with the community.</p> <p>Safe pedestrian and cyclist access was observed around the St Marys Station site during the audit site inspection. Accessible footpaths were observed and clear around the site perimeter hoarding and into and out of St Marys Station.</p> <p>There have been no known instances of restricted pedestrian or cyclist access to date around the St Marys site.</p>
<b>Road Traffic and Safety</b>				
E116	A <b>Traffic and Transport Liaison Group(s)</b> must be established in accordance with the Construction Traffic Management Framework to inform the development of <b>CTMP</b> .	<ul style="list-style-type: none"> <li>20240307 Metro WSA TTLG Meeting 34 - Minutes - 7 March 2024</li> <li>20240404 Metro WSA TTLG Meeting 35 - Minutes - 4 April 2024</li> <li>20240509 Metro WSA TTLG Meeting 36 - Minutes - 9 May 2024</li> <li>20240606 Metro WSA TTLG Meeting 37 - Minutes - 6 June 2024</li> <li>20240704 Metro WSA TTLG Meeting 38 - Minutes - 4 July 2024</li> </ul>	C	<p>A Traffic and Transport Liaison Group (TTLG) has been established for WSA. Meeting minutes were sighted from March-July 2024.</p> <p>As per the PLM Overarching CTMP Section 1.6, Sydney Metro is responsible for establishment of the TTLG. PLM will participate when necessary for SSTOM and provide the TTLG with required documentation.</p>
E117	Supplementary analysis and modelling as required by TINSW and / or the <b>Traffic and Transport Liaison Group(s)</b> must be undertaken to demonstrate that construction and operational traffic can be managed to minimise disruption to traffic network operations, including changes to and the management of pedestrian, bicycle and public transport networks, public transport services, and pedestrian and cyclist movements. Revised traffic management measures must be incorporated into the <b>CTMP</b> .	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>20240307 Metro WSA TTLG Meeting 34 - Minutes - 7 March 2024</li> <li>20240404 Metro WSA TTLG Meeting 35 - Minutes - 4 April 2024</li> <li>20240509 Metro WSA TTLG Meeting 36 - Minutes - 9 May 2024</li> <li>20240606 Metro WSA TTLG Meeting 37 - Minutes - 6 June 2024</li> <li>20240704 Metro WSA TTLG Meeting 38 - Minutes - 4 July 2024</li> <li>PLM Overarching CTMP, Rev0, dated 28/6/2023</li> <li>CTMP St Marys Station, Rev01, dated 3/4/2024</li> </ul>	NT	<p>As per the PLM Overarching CTMP Section 4.6, measures have been proposed for the scheduling of heavy vehicles to minimise the impact on road users during the SSTOM works including:</p> <ul style="list-style-type: none"> <li>Initial induction, mandatory training and regular briefings for all transport contractors</li> <li>Logistics monitoring to identify and regulate truck operations</li> <li>Providing personnel at the site gates, if necessary to meter the despatch of trucks onto the road network</li> <li>Management of truck movements along discrete routes to minimise cumulative impacts from heavy vehicles (see haulage routes in Annexure A)</li> <li>Regular checks of special and other events, not associated with SSTOM work activities, that could impact on heavy vehicle operations</li> <li>Scheduling, where feasible, to avoid operating school zones, high pedestrian activity times and peak road periods.</li> <li>Heavy vehicles will access the arterial roads via the most direct route</li> </ul> <p>For spoil haulage vehicles ParkLife Metro D&amp;C will use a software platform to manage and monitor truck movements. These records can be supplied to the relevant authorities and will be retained for one year post the completion of works.</p> <p>Permanent road works have not commenced for the SSTOM project.</p>
E118	As part of <b>Condition E117</b> the <b>Traffic and Transport Liaison Group(s)</b> is to identify opportunities to improve the intersection performance during operation at:	<ul style="list-style-type: none"> <li>20240307 Metro WSA TTLG Meeting 34 - Minutes - 7 March 2024</li> <li>20240404 Metro WSA TTLG Meeting 35 - Minutes - 4 April 2024</li> <li>20240509 Metro WSA TTLG Meeting 36 - Minutes - 9 May 2024</li> <li>20240606 Metro WSA TTLG Meeting 37 - Minutes - 6 June 2024</li> <li>20240704 Metro WSA TTLG Meeting 38 - Minutes - 4 July 2024</li> <li>PLM Overarching CTMP, Rev0, dated 28/6/2023</li> <li>CTMP St Marys Station, Rev01, dated 3/4/2024</li> </ul>	NT	<p>As per the PLM Overarching CTMP this requirement is held by Sydney Metro and improvements are required to be implemented prior to the commencement of operation.</p>
E119	Permanent road works, including vehicular access, signalised intersection works, and works relating to pedestrians, cyclists, and public transport users must be subject to safety audits demonstrating consistency with relevant design, engineering and safety standards and guidelines. Safety audits must be prepared in consultation with the relevant <b>Traffic and Transport Liaison Group</b> before the completion and use of the subject infrastructure and must be made available to the Planning Secretary upon request.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>20240307 Metro WSA TTLG Meeting 34 - Minutes - 7 March 2024</li> <li>20240404 Metro WSA TTLG Meeting 35 - Minutes - 4 April 2024</li> <li>20240509 Metro WSA TTLG Meeting 36 - Minutes - 9 May 2024</li> <li>20240606 Metro WSA TTLG Meeting 37 - Minutes - 6 June 2024</li> <li>20240704 Metro WSA TTLG Meeting 38 - Minutes - 4 July 2024</li> <li>PLM Overarching CTMP, Rev0, dated 28/6/2023</li> <li>CTMP St Marys Station, Rev01, dated 3/4/2024</li> </ul>	NT	<p>No permanent road works, including vehicular access, signalised intersection works, and works relating to pedestrians, cyclists, and public transport users had commenced for SSTOM.</p>

<b>Item</b>
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<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
<b>UTILITIES MANAGEMENT</b>				
E120	The CSSI must be designed and constructed with the objective of minimising impacts to, and interference with utilities infrastructure, and that such infrastructure and property is protected during construction. Utilities, services and other infrastructure potentially affected by construction must be identified before works affecting the item, to determine requirements for access to, diversion protection, and / or support. The relevant owner(s) and / or provider(s) of services must be consulted to make suitable arrangements for access to diversion, protection, and / or support of the affected infrastructure as required. The Proponent must ensure that disruption to any service is minimised and be responsible for advising local residents and businesses affected before any planned disruption of service.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>STM Precinct Utility Package Design Report, Stage 2, RevA, dated 3/10/2023</li> </ul>	C	<p>PLM has prepared a design report for the utilities package of works (STMUT0400), which had not commenced at the time of the audit. The design report was prepared to document the framework for the identification and management of utility authority assets including:</p> <ul style="list-style-type: none"> <li>Relocation of existing utilities impacted by the proposed bus interchange along the southern verge of Station Street including</li> <li>Decommissioning of the temporary construction power installed as part of SBT works</li> <li>Proposed new electrical ducts on the northern verge of Station Street to cater for future precinct developments</li> <li>Provision of new DN200 water main along Station Street from Queen Street to Glossop Street as per Sydney Water NOR to cater for firefighting requirements and future precinct water demand</li> <li>Establish connection to goods shed for all utilities</li> <li>Establish point of connection for any lead in works, and</li> <li>Space proof and coordinate the civil and urban design around existing utilities to be retained.</li> </ul> <p>Section 6.1 of the Utility Design Report commits to implementation of the Utility Strategy. The overarching strategy to manage utility impacts is to:</p> <ul style="list-style-type: none"> <li>Identify public utility assets within the project areas.</li> <li>Undertake a utility impact assessment of the proposed works. The assessment aims to identify: <ul style="list-style-type: none"> <li>Physical impacts from the proposed works, including road, drainage, TCS, structures, etc.</li> <li>Impact from a constructability, accessibility, and maintainability perspective.</li> </ul> </li> <li>Where impact to an asset is unavoidable, one of the three treatments have been adopted: <ul style="list-style-type: none"> <li>Protect during construction – temporary mechanical protection during construction or a change in construction methodology.</li> <li>Protect – permanent protection of the utility in its current position, e.g., protection slab, concrete encasement, etc.</li> <li>Relocate the utility</li> </ul> </li> </ul> <p>There has been no excavation that has the potential to disrupt utilities undertaken during the audit period.</p>
<b>Warragamba to Prospect Water Supply Pipeline</b>				
E121	The proponent must consult with WaterNSW regarding design, construction and operational management where the proposal interacts with the Warragamba to Prospect Water Supply Pipeline, and ensure that proposed construction and operational agreements are consistent with the "Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines" and implement all practical measures to protect the Warragamba to Prospect Water Supply Pipelines infrastructure, or as otherwise agreed to by WaterNSW.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>NVMP, SSTOM, Rev 02, 1/8/2023</li> </ul>	NT	<p>Section 6.4.3 of the SSTOM NVMP sets out the requirements for work near vibration sensitive structures, including heritage-listed structures.</p> <p>In accordance with REMM NAH8, a dilapidation survey of the Warragamba to Prospect Water Supply Pipelines has been completed by Sydney Metro. Prior to commencement of SSTOM Works, ParkLife Metro D&amp;C would consult with WaterNSW regarding design, construction and operational management where the proposal interacts with the Warragamba to Prospect Water Supply Pipeline, in accordance with Condition E121. Construction and operational agreements with WaterNSW would be consistent with the "Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines (WaterNSW, Sep 2021)".</p> <p>Condition E121 was not triggered for SSTOM during the audit period, but is expected to be triggered during the next IA3 audit period.</p>
<b>WASTE</b>				
E122	Waste generated during construction and operation must be dealt with in accordance with the following priorities:  (a) waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced; (b) where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered; and (c) where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Interview with ER, 19/8/2024</li> <li>SSTOM Waste Tracking Register</li> <li>Bingo Monthly Waste Report</li> <li>PLM Waste Management Sub-plan, Rev01, dated 28/7/20223</li> </ul>	C	<p>The project waste register for the period was sighted, and documented waste tracking requirements in the Waste Management Sub-plan (WMP) were reviewed. The waste hierarchy as per the WARR Act is described in Section 5.1 of the WMP.</p> <p>Bingo provides a Monthly Waste Report for Construction and office waste collected from each SSTOM site. Total recycled waste to date (March-July 2024) was reported as 97.64% for the airport terminal site.</p> <p>A Waste Tracking Register was sighted and includes: Site Name, Address, Product, Waste Type, Net Weight etc. Refer to Conditions E124 &amp; E125 for verification of the movement of spoil between SSTOM sites and to offsite disposal facilities.</p>

Item
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Result	Comment
NC	Non-Compliant (NC)
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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E123	The importation of waste and the storage, treatment, processing, reprocessing or disposal of such waste must comply with the conditions of the current EPL for the CSSI, or be done in accordance with a Resource Recovery Exemption or Order issued under the <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , as the case may be.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>SMF Import Material Tracker</li> <li>PLM Waste Management Sub-plan, Rev01, dated 28/7/20223</li> <li>Webuild Acceptance Letter (Tunnel Spoil from Gamuda), undated</li> <li>NSW EPA Section 143 Certificate, dated 11/4/2024</li> <li>The Sydney Metro West (Stage 2) Tunnel Spoil Order, November 2022 (Resource Recovery Order under Part 9, Clause 93 of the <i>POEO (Waste) Regulation 2014</i>)</li> <li>The Sydney Metro West (Stage 2) Tunnel Spoil Exemption, November 2022 (Resource Recovery Exemption under Part 9, Clauses 91 and 92 of the <i>POEO (Waste) Regulation 2014</i>)</li> <li>Spoil Compliance Assessments: <ul style="list-style-type: none"> <li>ADE Routine Tunnel Spoil Compliance Assessment Report reference: 23.0538 ROSMAC1_v1f, dated 27/11/2023</li> <li>ADE Routine Tunnel Spoil Compliance Assessment Report reference: 23.0538 ROSMAC9_v1f, dated 3/4/2024</li> <li>ADE Routine Tunnel Spoil Compliance Assessment Report reference: 23.0538 ROSMAC5_v1f, dated 5/3/2024</li> <li>ADE Routine Tunnel Spoil Compliance Assessment Report reference: 23.0538 ROSMAC14_v1f, dated 6/5/2024</li> </ul> </li> <li>ADE Monthly Spoil Inspection Records: <ul style="list-style-type: none"> <li>ADE, dated 14/5/2024</li> <li>ADE, dated 20/6/2024</li> <li>ADE, dated 26/7/2024</li> </ul> </li> </ul>	C	<p>Reusable tunnelling spoil (VENM &amp; ENM) has been imported during the SSTOM project for reuse at the Stabling and Maintenance Facility (SMF), Orchard Hills, with records included on the SMF Import Material Tracker from February to August 2024. The import material tracker includes: Date, General Description, Quantity (Tonnes), Material Classification, Onsite Placement, &amp; Truck registration.</p> <p>Tunnelling spoil (shale) has been imported from the Gamuda Western Tunnelling Package site at Rosehill to the SSTOM SMF, Orchard Hills. The TBM spoil was subject to a compliance review by consultants ADE, with results reported in the <i>ADE Routine Tunnel Spoil Compliance Assessment Report reference: 23.0538 ROSMAC1_v1f, dated 27/11/2023</i>. ADE tested stockpiled TBM spoil in the site's spoil shed - sourced from the NW portion of the Rosehill station box and adjacent tunnelling works extending to Unwin Street at a depth of 35mbl. Approximately 3,000m<sup>3</sup> of material was sampled and was described as 'natural shale'. The ADE review included review of relevant Detailed Site Investigations (DSIs) within the subject area, conducted an acid sulfate and PFAS risk assessment, and estimated the concentration of shotcrete, steel fibres and grout.</p> <p>The material was classified in accordance with a Site-Specific RRO/RRE - <i>The Sydney Metro West (Stage 2) Tunnel Spoil Order November 2022</i> with respect to interim advice on NAG test results provided by the NSW EPA. The ADE report included an assessment of compliance against the Sydney Metro Tunnel Spoil Order and was concluded to be compliant.</p> <p>An Acceptance Letter from Webuild S.p.A for Tunnel Spoil (shale) received from Gamuda (Australia) Pty Ltd was sighted, in which PLM confirms review of the ADE Routine Tunnel Spoil Compliance Assessment Report reference: 23.0538 ROSMAC1_v1f for receipt of TBM shale from Rosehill (Sydney Metro Western Tunnelling Package). PLM confirms the material is suitable for importation to the PLM Patons Lane, Orchard Hills site. The letter states the TBM Shale at Rosehill complies with the 'Sydney Metro West Stage 2 Tunnel Spoil order November 2022', and Parklife agreed that it can lawfully accept this material up to a maximum of 300,000 tonnes.</p> <p>A NSW EPA Section 143 Certificate was sighted, dated 11/4/2024 for Exempt Material in accordance with the Sydney Metro West (Stage 1) Tunnel Spoil Order December 2023 up to a maximum of 50,000 tonnes.</p> <p>In addition to TBM spoil, aggregate has also been imported under the <i>Recovered Aggregate Order 2014</i> under a Resource Recovery Order (RRO) under the <i>POEO (Waste) Regulations 2014</i>, and tracked in the Received Recycled Materials Register.</p> <p>Given the large volumes of material imported to the SMF, the Auditor requested that a summary of the due diligence process undertaken to ensure all legislative and other requirements have been satisfied in relation to material import. Auditees explained the process includes the following:</p> <ul style="list-style-type: none"> <li>Routine Spoil Assessments undertaken to ensure compliance with Resource Recovery Order/Exemption throughout the importation period (refer cited examples of Routine Spoil Compliance Assessment within the audit period)</li> <li>Monthly on-site inspections are undertaken by a suitably qualified environmental consultant to ensure imported material is visually consistent with the classification (refer cited inspection results within the audit period)</li> <li>Waste tracking register is maintained to document the spoil type, quantity and destination where it is lawfully accepted (as discussed above).</li> </ul> <p>The above process is documented in the Waste Management Sub-Plan Section 5, Appendix B - 1.3 and Figure B1.</p> <p>Routine spoil assessments/classification conducted at the generating site and monthly inspections at the receiving site represents PLMs internal auditing system to ensure compliance.</p> <p><b>NB: This audit does not constitute a full waste compliance audit and conclusions are based on representative documents and records provided for review.</b></p>
E124	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 <i>Protection of the Environment Operations (Waste) Regulation 2014</i> , or to any other place that can lawfully accept such waste.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Interview with ER, 19/8/2024</li> <li>PLM Waste Management Sub-plan, Rev01, dated 28/7/20223</li> <li>STM Material Tracking Register (St Marys) (Exporting Offsite), dated February-March 2024</li> <li>Douglas Partners In Situ Waste Classification Assessment - Tower Crane 1 Excavation, SSTOM St Marys Station Ref: 222771.0, dated 6/2/2024</li> <li>Djurwa Pty Ltd-Webuild SPA St Marys Disposal Dockets 01 Mar 2024</li> <li>Djurwa Pty Ltd-Webuild SPA St Marys Disposal Dockets 28 Feb 2024</li> <li>Djurwa Pty Ltd-Webuild SPA St Marys Disposal Dockets 29 Feb 2024</li> <li>Spoil Management Tracker (Between Sites), dated January 2024</li> <li>Douglas Partners VENM Assessment, SSTOM St Marys Metro Station Ref: 222771.01, dated 25/10/2023</li> </ul>	C	<p>Section 5.5 of the SSTOM WMP outlines the process for waste transport and disposal. A hold point has been set for the project and includes the following steps:</p> <ul style="list-style-type: none"> <li>Review and approval of the completed Section 143 documentation if the material is going to a receiving site not licensed by the EPA</li> <li>Review of receiving sites development application, planning approval or EPL to ensure the site holds the correct licence and/or approval to receive such material. A list of licensed waste disposal facilities in proximity to SSTOM Works has been developed and will be updated to include any other disposal or beneficial reuse sites identified during SSTOM Works (Appendix D).</li> </ul> <p>Disposal of the material will not occur until the Environment Manager has released the hold point.</p> <p>Requirements for waste tracking and reporting are documented in Section 5.5.1 of the SSTOM WMP and exemptions are outlined in Section 5.5.2. A Register of indicative waste disposal locations is included in Appendix D of the SSTOM WMP and includes the EPL Number for each location.</p> <p>Auditees advised spoil, ENM &amp; VENM is allowed to be moved between PLM EPL premise sites under the Waste Management Sub-plan. An internal tracking register is maintained for each site. REMM WR3 requires a material tracking system would be implemented for material transferred between construction sites. A Spoil Management Tracker is maintained for material moved between SSTOM project sites under the same EPL Premise Maps. The Spoil Management Tracker for St Marys to Bradfield Car Park was provided for review during the audit and included waste tracking records from 9/1/2024 to 30/1/2024. Information in the register included: Date, Quantity (Tonnes), Material Classification, Location of Removal (STM), Destination (Bradfield), and Truck Rego. The corresponding Waste Classification Report was sighted and aligned with the material description in the Spoil Management Tracker (VENM).</p> <p><b>Observation 7:</b> REMM WR3 requires a material tracking system would be implemented for material transferred between construction sites. The process outlining requirements for the movement of spoil, ENM &amp; VENM between PLM EPL premise sites was not adequately documented in the Waste Management Sub-plan.</p> <p><b>Recommendation:</b> Provide evidence for the approval for the movement of spoil, ENM &amp; VENM between PLM EPL premise sites. Document the approval and process for the movement of spoil, ENM &amp; VENM between PLM EPL premise sites in the Waste Management Sub-plan.</p> <p>A Material Tracking Register is also maintained for material disposed offsite from the SSTOM project. The Material Tracking Register for St Marys was provided for review during the audit and included data from 28/2/2024 to 1/3/2024. Information in the register included: Date &amp; Time Offsite, Destination, Description (Classification), Truck Rego, Tonnes &amp; EPL Number of receiving facility (EPL No. 20984). Disposal dockets were sighted from 28/2/24, 29/2/24 &amp; 1/3/24. The corresponding Waste Classification Report was sighted and aligned with the material description in the Material Tracking Register (GSW).</p> <p><b>Observation 8:</b> The STM Material Tracking Register (St Marys) did not include all required details, as documented in Section 5.5.1 of the SSTOM WMP. Details missing included: Haulage contractor, Material Type, Waste Receiving Location, Docket numbers.</p> <p><b>Recommendation:</b> Review and update the Material Tracking Register template to include all required details, as documented in Section 5.5.1 of the SSTOM WMP. It is also recommended that a reference to the corresponding Waste Classification Report is included in the Material Tracking Register.</p> <p><b>Observation 9:</b> Receiving Facility with EPL No. 20984 was not listed in the Register of indicative waste disposal locations, Appendix D of the SSTOM WMP.</p> <p><b>Recommendation:</b> Update the Register of indicative waste disposal locations, Appendix D of the SSTOM WMP to include approved disposal locations and EPLs.</p>

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E125	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"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Interview with ER, 19/8/2024</li> <li>PLM Waste Management Sub-plan, Rev01, dated 28/7/20223</li> <li>STM Material Tracking Register (St Marys) (Exporting Offsite), dated February-March 2024</li> <li>Douglas Partners In Situ Waste Classification Assessment - Tower Crane 1 Excavation, SSTOM St Marys Station Ref: 222771.0, dated 6/2/2024</li> <li>Djurua Pty Ltd-Webuild SPA St Marys Disposal Dockets 01 Mar 2024</li> <li>Djurua Pty Ltd-Webuild SPA St Marys Disposal Dockets 28 Feb 2024</li> <li>Djurua Pty Ltd-Webuild SPA St Marys Disposal Dockets 29 Feb 2024</li> <li>Spill Management Tracker (Between Sites), dated January 2024</li> <li>Douglas Partners VENM Assessment, SSTOM St Marys Metro Station Ref: 222771.01, dated 25/10/2023</li> </ul>	C	Waste classification reports were sighted for the examples of waste tracking between sites and to offsite disposal facilities as described for Condition E124. Disposal dockets and Waste Classifications were provided on request and aligned with data recorded in the Material Tracking Registers.

WATER				
E126	The CSSI must be designed and constructed so as to maintain the NSW Water Quality Objectives (NSW WQO) where they are being achieved as at the date of this approval, and contribute towards achievement of the NSW WQO over time where they are not being achieved as at the date of this approval, unless an EPL in force in respect of the CSSI contains different requirements in relation to the NSW WQO, in which case those requirements must be complied with.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3</li> <li>Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 01, 17/7/2023</li> <li>Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev01, 17/7/2023 (SWMP, Appendix B)</li> <li>SMWSA NSW (Off-airport) Wastewater Discharge Impact Assessment (WDIA), Station Boxes and Tunneling Works (SBT), RevA.02, dated 17/11/2022</li> <li>SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil &amp; Alignment Works, Rev01, dated 13/7/20222</li> <li>SSTOM Discharge Point Schedule EPL 211807</li> <li>Email from PLM Senior Environmental Consultant to NSW EPA RE: EPL No. 21807 - Request for licence variation - Additional discharge points and premise map update, dated 8/8/2024</li> <li>PLM SMWSA SSTOM Dewatering Register, up to 19/8/2024 (Register of discharge from Orchard Hills M7 sediment basin &amp; St Marys sediment basin as per EPL)</li> </ul>	C	<p>PLM maintains water quality objectives in accordance with Condition E126 by conducting water quality monitoring, and analysing results, in accordance with the parameters and discharge criteria set out in a Water Discharge Impact Assessment (WDIA). Two WDIA's were provided for review during the audit, the first prepared by SEEC in July 2022 for the Sydney Metro Surface Civil &amp; Alignment Works, and the 2nd prepared in November 2022 for the Off-airport Station Boxes and Tunneling Works (SBT).</p> <p>The SSTOM surface water quality monitoring program (SWQMP) is set out in Section 6.12.1 and Appendix B of the Soil and Water Management Plan (SWMP). The SWQMP commits to monitoring water quality to ensure discharge from the construction impact area is "in accordance with regulatory guidelines, ANZECC/NSW Water Quality Objectives (required by CoA E126), or EPL discharge criteria, and to confirm conclusions from the Water Pollution Discharge Impact Assessment (prepared to CoA E130) and to identify potential non-compliances and corrective actions". Surface water monitoring is conducted at the 14 locations set out in Section 5.1 of the SWQMP at the frequency stated in Section 5.2. Sampling parameters are outlined in Section 5.4.</p> <p>Water quality trigger values are set out in Section 5.5 and Table 10. The project environmental values, based on ANZG 2018 and ANZECC guideline trigger values for the selected toxicants, would be applied for the protection of 95 percent of species in slightly disturbed to moderately disturbed freshwater systems, and 99 percent species protection level for toxicants that bioaccumulate. For physical and chemical stressors, the ANZG 2018 guidelines are the same as the ANZECC 2000 and provide guideline trigger values for slightly disturbed ecosystems in lowland rivers in south-east Australia as shown in Table 10.</p> <p>It is noted that Surface water quality monitoring requirements from the EPL will be undertaken in addition to the monitoring described in the SWQMP. The SSTOM Discharge Point Schedule under EPL 211807 was provided for review and includes discharge and monitoring points located at Aerotropolis (Sediment Basin &amp; WTP), St Marys (WTP), Orchard Hills, Linewide South, and the SMF (Sediment Basins).</p> <p>In an email to NSW EPA on 8/8/2024 PLM confirmed "The Discharge Impact Assessment (DIA), prepared by Strategic Environmental and Engineering Consulting (SEEC), on behalf of the SCAW contractor has been reviewed to ensure it remains appropriate and applicable to the ParkLife Metro SSTOM package of works. The DIA assessed discharge to both Cosgroves Creek (proposed EPL Point 5) and Blaxland Creek (Proposed EPL Point 6) and the deflection volume proposed in the variation request remains consistent with the DIA. The sediment basins will be managed, maintained and operated by ParkLife Metro in a manner consistent with the DIA".</p> <p>An Annual Construction Monitoring Report is required to be prepared under the SWMP. This first Surface Water Quality Construction Monitoring Report for SSTOM will cover the period from commencement of Construction on 8/8/2023 to 8/8/2024. The first Surface Water Quality Construction Monitoring Report for SSTOM was not available for review at the time of this audit, and will be reviewed for the IA3 audit period.</p>

Construction Requirements				
E127	The Proponent must consider the Guidelines for controlled activities on waterfront land Riparian corridors (Department of Industry 2018) when carrying out work within 40 metres of a watercourse, including its bed.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection 14/8/2024</li> <li>Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 01, 17/7/2023</li> </ul>	NT	<p>Section 6.5 of the SWMP sets out requirements for works in waterways and temporary waterway crossings.</p> <p>The SSTOM SWMP commits to undertaking work in and around waterways (within 40m), including in the main creek channels (at Blaxland Creek, unnamed watercourse south of Patrons Lane and Cosgroves Creek) in accordance with the Guidelines for controlled activities on waterfront land riparian corridors (Department of Industry 2018). "Works will be scheduled in waterways during periods of predicted low flow to minimise impacts and will be avoided during rainfall events. Where possible, existing creek bed material will be reclaimed and re-used in the reconstruction or stabilisation of creeks. Disturbed creeks will be progressively stabilised to avoid potential scouring and sedimentation with permanent stabilisation measures implemented as soon as practicable".</p> <p>"Temporary waterway crossings, if required, will be designed, constructed, and maintained, consistent with the Blue Book, the Fish Passage Requirements for Waterway Crossings and Policy (2003) and Guidelines for Fish Friendly Waterway Crossings (2003). This design process will be completed in consultation with DPI Fisheries to minimise impacts on natural flow regimes and to not present any barriers. Temporary waterway crossings will be designed by a suitably qualified and experienced person and will incorporate suitable hard, durable material that will avoid erosion of fine particles into waterways or siltation of waterways".</p> <p>"Erosion and sediment controls will be implemented at the entry and exits points of temporary waterway crossings and will be included in the progressive ESCPs. The progressive ESCPs will document that works within the main creek channels will be avoided during and immediately following rainfall events, unless necessary in an emergency to avoid property damage or prevent the loss of life".</p> <p>There were no SSTOM works known to have occurred within 40m of a watercourse at the time of the audit. It is understood there are three planned waterway crossings for SSTOM at a later stage of the project (Linewide).</p>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA_SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E128	Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection 14/8/2024</li> <li>SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Orchard Hills, Rev05, dated 1/8/2024</li> <li>SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Orchard Hills, Rev03, dated 4/6/2024</li> <li>Sydney Metro Environmental Incident and Non-compliance Notification Report, NCR 003, dated 27/2/2024</li> <li>NCR 003 - OHE ESC Installation DPHI submission (SSI-10051-PA-373), dated 1/3/2024</li> <li>DPHI Response RE: Sydney Metro - Western Sydney Airport - SSTOM Non-Compliance Notification Condition E128 - Service Level Agreement, dated 14/3/2024</li> </ul>	NC	<p>Progressive Erosion and Sediment Control Plans (PESCPs) were provided for review for Orchard Hills and St Marys, which are updated on a progressive basis to reflect the current stage of construction.</p> <p>The following observations were made in relation to ERSED during the audit site inspection:</p> <p><b>St Marys</b>  <b>Observation 10:</b> The status of the stormwater connection across the hardstand section of the St Marys station site was unable to be confirmed. ERSED controls for stormwater grates may be inadequate.  <b>Recommendation:</b> Confirm stormwater connection status. If connected, additional controls should be applied to stormwater grates to reduce the risk of sediment entry.</p> <p><b>Orchard Hills</b>  <b>Observation 11:</b> The cattle grid had filled with sediment-laden water and was overflowing onto Lansdowne Road at the heavy vehicle access. Sediment-laden water could also be seen moving across the hardstand driveway onto the nature strip. ERSED controls in place were inadequate. There was no stormwater infrastructure in place along the road, with runoff directed to the nearest waterway.  <b>Recommendation:</b> Review ERSED controls in place at the HV access on Lansdowne Road, including placement of the cattle grid, to reduce the risk of sediment-laden water leaving the site. The dirty water stream may be able to be diverted to the nearby sediment basin (SE Basin).</p> <p>There was one notification of Non-Compliance submitted to DPHI for SSTOM during the audit period. Notification of the NC to DPHI was within the required 7-day timeframe. Refer Condition A44 for details.</p> <p><b>Self-Reported Non-compliance:</b>  A NC with Condition E128 (SSI 10051) was raised by the project and notified to DPHI on 27/2/2024. The erosion and sediment controls (ESC) in certain areas of the Orchard Hills (OHE) site were not installed or maintained in a timely manner or before undertaking work, as per the project Erosion and Sediment Control Plan (ESCP), which included: <ul style="list-style-type: none"> <li>The batters located on the northwestern portion of the site were not completely stabilised.</li> <li>Batter chutes located on the northwestern portion of the site were installed, but geofabric stabilisation requires pinning.</li> <li>Rocked lined drain leading to the basin south of Lansdowne Road had not been maintained.</li> <li>Batters above swale drain the drains to the OHE basin were not stabilised, resulting in increased sediment load being captured in the swale drain checks and basin.</li> </ul> It is noted that the above actions were previously identified during fortnightly inspections with Sydney Metro and the ER, and timeframes for the identified actions were not closed in the agreed timeframes, resulting in the identified non-compliance.</p>
E129	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from construction wastewater treatment plants to surface waters must not exceed:  (a) the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (ANZG (2018)) default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 (ANZECC/ARMCANZ); and (c) for bio accumulative and persistent toxicants, the ANZG (2018) guidelines values at a minimum of 99 per cent species protection level.  Where the ANZG (2018) does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG (2018) for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3</li> <li>Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 01, 17/7/2023</li> <li>Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev01, 17/7/2023 (SWMP, Appendix B)</li> <li>SMWSA NSW (Off-airport) Wastewater Discharge Impact Assessment (WDIA), Station Boxes and Tunnelling Works (SBT), RevA.02, dated 17/11/2022</li> <li>SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil &amp; Alignment Works, Rev01, dated 13/7/2022</li> <li>SSTOM Discharge Point Schedule EPL 211807</li> <li>Email from PLM Senior Environmental Consultant to NSW EPA RE: EPL No. 21807 - Request for licence variation - Additional discharge points and premise map update, dated 8/8/2024</li> <li>PLM SMWSA SSTOM Dewatering Register, up to 19/8/2024 (Register of discharge from Orchard Hills M7 sediment basin &amp; St Marys sediment basin as per EPL)</li> <li>Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206, dated 5/12/2023</li> </ul>	C	<p>The SSTOM Discharge Point Schedule under EPL 211807 was provided for review and includes discharge and monitoring points located at Water Treatment Plants (WTPs) located at Aerotropolis and St Marys.</p> <p>A Water Treatment Plant (WTP) was setup at the St Marys Station site and treats surface water runoff that accumulates across the hardstand, discharging to sewer in accordance with a Trade Waste Agreement with Sydney Water, dated 5/12/2023.</p> <p><b>Refer to Condition C1 for recommendations to update the CEMP and SWMP to identify the TWA and address TWA conditions.</b></p>
E130	If construction stage stormwater discharges are proposed, a <b>Water Pollution Impact Assessment</b> will be required. Any such assessment must be prepared in consultation with the EPA and be consistent with the National Water Quality Guidelines, with a level of detail commensurate with the potential water pollution risk.  <b>Note:</b> If an EPL is required the <b>Water Pollution Impact Assessment</b> will be required to inform licensing consistent with section 45 of the POEO Act.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection 14/8/2024</li> <li>Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 01, 17/7/2023</li> <li>Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev01, 17/7/2023 (SWMP, Appendix B)</li> <li>ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3</li> <li>SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil &amp; Alignment Works, Rev01, dated 13/7/2022</li> </ul>	C	<p>Construction stage stormwater discharges have been proposed for SSTOM sites at Bradfield, SMF and Orchard Hills.</p> <p>A Water Discharge Impact Assessment (WDIA) was prepared by Strategic Environmental and Engineering Consulting (SEEC), on behalf of the SCAW contractor has been reviewed to ensure it remains appropriate and applicable to the ParkLife Metro SSTOM package of works. The DIA assessed discharge to both Cosgroves Creek (proposed EPL Point 5) and Blaxland Creek (Proposed EPL Point 6) and the detention volume proposed in the variation request remains consistent with the DIA. The sediment basins will be managed, maintained and operated by ParkLife Metro in a manner consistent with the DIA.</p> <p>The WDIA set turbidity discharge limits for discharges to various waterways but concluded that despite this discharge impact assessment indicating that the local waterways can cater for construction basin discharges between 59 NTU and 73 NTU, a conservative discharge limit of 50 NTU was recommended for discharge to all waterways.</p> <p>Based on modelling in the assessment, turbidity in all waterways already naturally exceeds 50 NTU during and after heavy rainfall events, and this is expected to continue to occur during construction.</p>

<b>Item</b>
<b>Project Name:</b> SSI 10051 Sydney Metro Western Sydney Airport
<b>Auditee/ Client:</b> ParkLife Metro / Sydney Metro
<b>Auditor:</b> [REDACTED], Morasey Environment Pty Ltd
<b>Audit Details:</b> Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Project No.:</b> MESYM 2024105-01 Sydney Metro IEA2_WSA SSTOM_August 2024

<b>Result</b>	<b>Comment</b>
NC	Non-Compliant (NC)
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E131	Drainage feature crossings (permanent and temporary watercourse crossings and stream diversions) and drainage swales and depressions must be carried out in accordance with relevant guidelines and designed by a suitably qualified and experienced person.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> <li>Site inspection 14/8/2024</li> <li>Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 01, 17/7/2023</li> <li>Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev01, 17/7/2023 (SWMP, Appendix B)</li> <li>ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3</li> <li>SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil &amp; Alignment Works, Rev01, dated 13/7/2022</li> </ul>	NT	<p>Section 6.5 of the SWMP sets out requirements for works in waterways and temporary waterway crossings. The SSTOM SWMP commits to undertaking work in and around waterways (within 40m), including in the main creek channels (at Blaxland Creek, unnamed watercourse south of Patons Lane and Cosgroves Creek) in accordance with the Guidelines for controlled activities on waterfront land riparian corridors (Department of Industry 2018). "Works will be scheduled in waterways during periods of predicted low flow to minimise impacts and will be avoided during rainfall events. Where possible, existing creek bed material will be reclaimed and re-used in the reconstruction or stabilisation of creeks. Disturbed creeks will be progressively stabilised to avoid potential scouring and sedimentation with permanent stabilisation measures implemented as soon as practicable. Temporary waterway crossings, if required, will be designed, constructed, and maintained, consistent with the Blue Book, the Fish Passage Requirements for Waterway Crossings and Policy (2003) and Guidelines for Fish Friendly Waterway Crossings (2003). This design process will be completed in consultation with DPI Fisheries to minimise impacts on natural flow regimes and to not present any barriers. Temporary waterway crossings will be designed by a suitably qualified and experienced person and will incorporate suitable hard, durable material that will avoid erosion of fine particles into waterways or siltation of waterways. Erosion and sediment controls will be implemented at the entry and exits points of temporary waterway crossings and will be included in the progressive ESCPs. The progressive ESCPs will document that works within the main creek channels will be avoided during and immediately following rainfall events, unless necessary in an emergency to avoid property damage or prevent the loss of life".</p> <p>There were no SSTOM works known to have occurred within 40m of a watercourse at the time of the audit. It is understood there are three planned waterway crossings for SSTOM at a later stage of the project.</p>
<b>Operational Requirements</b>				
A132	<p>Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from operational water treatment plants to surface waters must not exceed:</p> <p>(a) the ANZG 2018 default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ, 2000); and (c) for bio accumulative and persistent toxicants, the ANZG 2018 guideline values at a minimum of 99 per cent species protection level.</p> <p>Where the ANZG 2018 does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG 2018 for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	There were no operational WTPs in place on SSTOM sites.
<b>Groundwater</b>				
E133	Make good provisions for groundwater users must be provided in the event of a material decline in water supply levels, quality or quantity from registered existing bores associated with groundwater changes from either construction and/or ongoing operational dewatering caused by the CSSI.	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	Groundwater monitoring had not commenced for SSTOM at the time of the audit.
E134	<p>The Proponent must submit a revised <b>Groundwater Modelling Report</b> to the Planning Secretary for information before bulk excavation at the relevant construction location. The <b>Groundwater Modelling Report</b> must include:</p> <p>(a) for each construction site where excavation will be undertaken, cumulative (additive) impacts from nearby developments, parallel transport projects and nearby excavation associated with the CSSI; (b) predicted incidental groundwater take (dewatering) including cumulative project effects; (c) potential impacts of the CSSI or detail and demonstrate why the CSSI will not have lasting impacts to the groundwater system, ongoing groundwater incidental take and groundwater level drawdown effects; (d) actions required to minimise the risk of inflows (including in the event the CSSI are delayed or do not progress) and a strategy for accounting for any water taken beyond the life of the operation of the CSSI; (e) saltwater intrusion modelling analysis, from saline groundwater in shale, into metro station sites; and (f) a schematic of the conceptual hydrogeological model.</p>	<ul style="list-style-type: none"> <li>Interview with Sydney Metro &amp; ParkLife Metro, 15/08/2024</li> </ul>	NT	SSTOM has not undertaken any bulk excavation.



## **Independent Environmental Audit Report**

**Sydney Metro**

**Western Sydney Airport (SSI 10051)**

**Stations, Systems, Trains, Operations and Maintenance (SSTOM)**

**Attachment 2: Planning Secretary Appointment of Experts**

Our ref: SSI-10051-PA-435

via Major Projects Portal

4 July 2024

Attention: Mr [REDACTED], Sydney Metro Director Environment, Sustainability and Planning

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**Subject:** Sydney Metro Western Sydney Airport (SSI-10051) – approval of independent auditors

Dear [REDACTED],

I refer to your letters dated 12 & 26 June 2024 (your ref. SM-24-00125100 & SM-24-00133423) requesting the Planning Secretary's approval of suitably qualified, experienced, and independent persons as independent environmental auditors of the Sydney Metro - Western Sydney Airport project (SSI-10051, as modified).

Further to our letter dated 19 December 2023 regarding the fifth construction phase independent environmental audit and WolfPeak having an identified conflict of interest for the stations, systems, trains, operations and maintenance (**SSTOM**) stage delivered by the Parklife Metro consortium, the sixth construction phase independent audit is also proposed to comprise two separate audits by two separate auditors.

### Independent auditors

NSW Planning has reviewed your letters against the *Independent Audit Post Approval Requirements* (2020; **Independent Audit PARs**). NSW Planning is satisfied that all four nominees are certified with Exemplar Global as either lead or principal auditors in environmental management systems, are suitably experienced in state significant projects, and have supplied declarations of independence.

NSW Planning acknowledges that Ms [REDACTED] performs work for Healthy Buildings International, which provides environment representative services to various Sydney Metro projects, and has previously performed work for WolfPeak, which provides independent auditor services to various Sydney Metro projects, but does not consider that this would preclude her provision of independent audit services on this project at this point in time.

Consequently, I can advise that under Condition A38 of SSI-10051, the Planning Secretary has approved the following auditors for the sixth construction phase independent audit:

#### SSTOM stage excluded:

- Mr [REDACTED], Wolfpeak, as lead auditor
- Mr [REDACTED], WolfPeak, as auditor

## Department of Planning, Housing and Infrastructure

### SSTOM stage only:

- Ms [REDACTED], Morasey Environment, as lead auditor
- Mr [REDACTED], Trigalana Environmental, as auditor.

NSW Planning reminds the lead auditor that the Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit PARs. Failure to meet these requirements will require revision and resubmission. As this will be Ms Heltborg's first audit under the Independent Audit PARs of a Sydney Metro project, she is invited to meet with NSW Planning Compliance in the scope development.

NSW Planning reserves the right to request an alternate auditor(s) for future audits.

### **Independent audits and reports, and Sydney Metro response**

Under Condition A36 of SSI-10051 independent audits must be conducted and carried out in accordance with the Independent Audit PARs. Under condition A40 of SSI-10051, the independent audit report and the proponent's response to audit findings must be submitted within two months of the audit site inspection, unless otherwise agreed by the Planning Secretary.

As the sixth construction phase independent environmental audit is to comprise two separate audits, please ensure that:

- the two audit inspections are carried out within a fortnight of each other and no later than 31 August 2024
- Sydney Metro, as the proponent, prepares a single response to the two audit reports, with the two audit reports and Sydney Metro's response submitted via the Major Projects Portal as a single submission within two months of the latest audit inspection.

Please ensure this correspondence is appended to each Independent Audit Report.

Should you wish to discuss the matter further, please contact me or Rob Sherry, Team Leader Compliance.

Yours sincerely,

[REDACTED]

A/Team Leader Compliance – Government Projects  
NSW Planning

*As nominee of the Planning Secretary*

## **Independent Environmental Audit Report**

**Sydney Metro**

**Western Sydney Airport (SSI 10051)**

**Stations, Systems, Trains, Operations and Maintenance (SSTOM)**

**Attachment 3: Independent Audit Declaration Form**

## Independent Audit Report Declaration Form

<b>Project Name</b>	Sydney Metro Western Sydney Airport
<b>Consent Number</b>	SSI 10051
<b>Description of Project</b>	<p>Development of the Sydney Metro Western Sydney Airport project comprising:</p> <ul style="list-style-type: none"> <li>• construction and operation of approximately 23 kilometres of railway track between the T1 Western Line rail line and the proposed Western Sydney Aerotropolis in Bringelly,</li> <li>• construction and operation of new stations and associated ancillary infrastructure at St Marys, Orchard Hills, Luddenham and the Aerotropolis Core precinct,</li> <li>• interchange links with the existing T1 Western Line rail line,</li> <li>• construction and operation of a train stabling and maintenance facility, including an operational control centre,</li> <li>• construction and operation of associated rail infrastructure facilities, construction of tunnels, bridges, viaducts and associated works,</li> <li>• site preparation and enabling earthworks, including land remediation,</li> <li>• associated ancillary infrastructure and works.</li> </ul>
<b>Project Address</b>	Land in the suburbs of Oxley Park, North St Marys, St Marys, Werrington, Werrington County, Kingswood, Claremont Meadows, Caddens, St Clair, Erskine Park, Orchard Hills, Luddenham, Greendale, Badgerys Creek, Kemps Creek and Bringelly, in the City of Penrith and City of Liverpool local government areas.
<b>Proponent</b>	Sydney Metro
<b>Title of Audit</b>	Independent Environmental Audit No. 2 – Stations, Systems, Trains, Operations and Maintenance (SSTOM)
<b>Audit Date</b>	14 <sup>th</sup> August 2024

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)

<b>Name of Auditor</b>	██████████
<b>Signature</b>	████████████████████
<b>Qualification</b>	Master of Environmental Management Exemplar Global Auditor Number 111000
<b>Company</b>	Morasey Environment Pty Ltd

## **Independent Environmental Audit Report**

**Sydney Metro**

**Western Sydney Airport (SSI 10051)**

**Stations, Systems, Trains, Operations and Maintenance (SSTOM)**

**Attachment 4: Consultation Records**

**From:** @dpie.nsw.gov.au>  
**Sent:** Wednesday, 24 July 2024 11:50 AM  
**To:** [REDACTED]  
**Subject:** RE: Independent Audit 6 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM - Consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi [REDACTED]

Thank you for your time yesterday afternoon.

As discussed, notwithstanding that two audit teams have been approved for the sixth construction phase independent audit of the Sydney Metro Western Sydney Airport project (SSI-10051) (our ref. PA-435), the purpose of any audit under the *Independent Audit Post Approval Requirements* (May, 2020; **Independent Audit PAR**) is to obtain a holistic point-in-time assessment of the environmental performance and compliance status of a project. As such in reviewing environmental performance and management plans as required under section 3.3 of the Independent Audit PAR, please ensure:

- consistency assessments / environmental reviews for the period are identified
- the staging report is reviewed
- interfaces and cumulative impacts between SSTOM and other project stages (SBT, SCAW, AEW) are considered
- the accuracy and adequacy of SSTOM management plans is reviewed, including preparedness for imminent phases like linewide.

Please also consult with the NSW EPA, Penrith and Liverpool City Councils – in doing this, you may like to coordinate with the other approved audit team.

Should you wish to discuss further, please don't hesitate to contact me or Rob Sherry,

**Senior Compliance Officer**

NSW Planning | Department of Planning Housing & Infrastructure  
Locked Bag 5022 | PARRAMATTA NSW 2124  
[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



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**From:** [REDACTED]  
**Sent:** Monday, 8 July 2024 4:25 PM  
**To:** DPE PSVC Compliance Mailbox <[compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)>  
**Cc:** [@transport.nsw.gov.au](mailto:@transport.nsw.gov.au); [@transport.nsw.gov.au](mailto:@transport.nsw.gov.au)  
**Subject:** Independent Audit 6 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM - Consultation

Good Morning,



As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with DPHI on the scope of the 6<sup>th</sup> Construction Independent Audit for the stations, systems, trains, operations and maintenance (SSTOM) stage delivered by the Parklife Metro consortium in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The audit is scheduled to commence with a site inspection prior to 16<sup>th</sup> August 2024 (date TBC) and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:


- an assessment of compliance with SSI 8863 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - actual impacts compared to predicted impacts documented in the environmental impact assessment;
  - the physical extent of the development in comparison with the approved boundary;
  - incidents, non-compliances and complaints that occurred or were made during the audit period;
  - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
  - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that DPHI confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We look forward to hearing from you before **26<sup>th</sup> July 2024**.

Please note I will be on leave from 9-22<sup>nd</sup> July and will respond on my return.

Kind regards,

  
Principal Environmental Auditor  
Morasey Environment Pty Ltd

**M:**

**E:**   
**W:** [www.morasey.com.au](http://www.morasey.com.au)

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 25 July 2024 2:25 PM  
**To:** info@epa.nsw.gov.au  
**Cc:** [REDACTED]  
**Subject:** Independent Audit 6 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM - Consultation

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with NSW EPA on the scope of the 6<sup>th</sup> Construction Independent Audit for the stations, systems, trains, operations and maintenance (SSTOM) stage delivered by the Parklife Metro consortium in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link: [getContent \(nsw.gov.au\)](#)

The IAPAR is available at the following link:  
[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection prior to 16<sup>th</sup> August 2024 (date TBC) and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - actual impacts compared to predicted impacts documented in the environmental impact assessment;
  - the physical extent of the development in comparison with the approved boundary;
  - incidents, non-compliances and complaints that occurred or were made during the audit period;
  - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
  - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **8<sup>th</sup> August 2024**.

Kind regards,

**From:** [REDACTED]  
**Sent:** Thursday, 25 July 2024 2:28 PM  
**To:** council@penrith.city  
**Subject:** Attn: - Independent Audit 6 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM - Consultation

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with Penrith City Council (PCC) on the scope of the 6<sup>th</sup> Construction Independent Audit for the stations, systems, trains, operations and maintenance (SSTOM) stage delivered by the Parklife Metro consortium in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link: [getContent \(nsw.gov.au\)](#)

The IAPAR is available at the following link:  
[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection prior to 16<sup>th</sup> August 2024 (date TBC) and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - actual impacts compared to predicted impacts documented in the environmental impact assessment;
  - the physical extent of the development in comparison with the approved boundary;
  - incidents, non-compliances and complaints that occurred or were made during the audit period;
  - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
  - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that PCC confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **8<sup>th</sup> August 2024**.

Kind regards,

■

**From:** @liverpool.nsw.gov.au>  
**Sent:** Thursday, 8 August 2024 12:37 PM  
**To:** [REDACTED]  
**Cc:**  
**Subject:** Liverpool Council Response RE: Independent Audit 6 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM - Consultation

Good Afternoon [REDACTED]

Thank you for your time this afternoon to provide some additional guidance in relation to the Independent Audit 6 in relation to SSI-10051 (Council reference SSD1-25/2020).

Council have reviewed the terms of the IAPAR and consider that the Scope of Audit 6 satisfy these requirements.

In terms of compliance issues, Council have not been informed of any specific variations to SSI-10051 Sydney Metro Western Sydney Airport. Council is satisfied that the Audit scope will ensure that compliance issues will be identified and resolved as part of this process.

Council would request that we be advised when Audit 6 is available for public view, so this document may be downloaded and included on Council's relevant file for the site.

I hope you are keeping well.

Regards,

Principal Strategic Planner



[@liverpool.nsw.gov.au](mailto:@liverpool.nsw.gov.au)

Customer Service: 1300 36 2170 | 33 Moore Street Liverpool, NSW 2170, Australia



[www.liverpool.nsw.gov.au](http://www.liverpool.nsw.gov.au)



*We acknowledge the traditional custodians of the land that now resides within Liverpool City Council's boundaries, the Darug and Dharawal nations.*

This email (including any attachments) may contain confidential and/or legally privileged information. If you are not the intended recipient please delete this email and notify us if prohibited.

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**From:** [REDACTED]  
**Sent:** Thursday, July 25, 2024 2:27 PM  
**To:** LCC <[LCC@liverpool.nsw.gov.au](mailto:LCC@liverpool.nsw.gov.au)>  
**Subject:** Attn : Independent Audit 6 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM - Consultation

Good Afternoon,

As the independent auditor engaged by Sydney Metro for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified), I am consulting with Liverpool City Council (LCC) on the scope of the 6<sup>th</sup> Construction Independent Audit for the stations, systems, trains, operations and maintenance (SSTOM) stage delivered by the Parklife Metro consortium in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link: [getContent \(nsw.gov.au\)](#)

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](#)

The audit is scheduled to commence with a site inspection prior to 16<sup>th</sup> August 2024 (date TBC) and pertains to post-approval requirements and compliance during Construction.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 10051 Schedule 2, Parts A, B, C, E and Appendix A, in particular those conditions and requirements which are applicable to SSTOM, as identified in the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - actual impacts compared to predicted impacts documented in the environmental impact assessment;
  - the physical extent of the development in comparison with the approved boundary;
  - incidents, non-compliances and complaints that occurred or were made during the audit period;
  - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
  - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that LCC confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **8<sup>th</sup> August 2024**.

Kind regards,

████████████████████  
Principal Environmental Auditor  
Morasey Environment Pty Ltd

**M:**

**E:** ████████████████████

**W:** [www.morasey.com.au](http://www.morasey.com.au)